



Directorate of Transformation

**John R Harrison DipEnvP, MRTPI
Borough Planner**

PO Box 16 , 52 Derby Street
Ormskirk , West Lancashire L39 2DF
Telephone: 01695 577177
Website: www.westlancs.gov.uk
Fax: 01695 585113
Email: plan.apps@westlancs.gov.uk

Alan C Scott
Department for Communities and Local
Government
National Planning Policy Framework
Zone 1/H6, Eland House
Bressenden Place
London, SW1E 5DU

Date: 10th October 2011
Your ref:
Our ref:
Please ask for: John Harrison
Direct dial no: 01695 585132
Extension: 5132

Dear Mr Scott

RE: Consultation on the Draft National Planning Policy Framework

Thank you for inviting West Lancashire Borough Council (WLBC) to respond to the consultation on the draft National Planning Policy Framework (NPPF). The Council's formal response to the consultation questions on the draft document and the Impact Assessment are enclosed, but the Council would like to take this opportunity to offer its broad support to the draft NPPF and draw out some key comments from the enclosed response where the Council feels that the draft document could be improved further with some clarification of minor changes.

The simplification of national planning policy

WLBC welcomes the simplified draft NPPF and the fact that it does appear to have included much of the essential national policy currently used by Local Authorities. However, it is crucial that the potential guidance that will sit alongside the NPPF is outlined in more detail, with details of what guidance will be made available and which organisations will be responsible for preparing it by the time the final NPPF is published. The Council has some concerns about which bodies may be able to produce such guidance and there does need to be clarity on this matter. Any such guidance should be officially endorsed by the Government and it needs to be made clear what weight it carries compared to 'unofficial' guidance produced by third parties.

The presumption in favour of sustainable development

WLBC supports the continuation of the "golden thread" of sustainable development put forward in the draft NPPF and welcomes the use of the Brundtland Commission's definition in paragraph 9. However, it is vital that the NPPF makes it clear that it is this

**Chief Executive: William J. Taylor MBE
Director of Transformation: Kim Webber B.Sc., M.Sc.**

definition that should be applied when considering the “presumption in favour of sustainable development” to enable reasonable scope for particular local circumstances to influence planning decisions.

There is a concern that the draft NPPF does not clearly state that this is the case and that other references to sustainable development throughout the document appear to focus more on economic growth than other aspects of sustainability. This lack of clarity could, unintentionally, encourage the submission of proposals for development in inappropriate locations, and therefore ultimately encourage *unsustainable* development through the “presumption in favour of sustainable development”, especially where the local plan is absent, silent, indeterminate or out of date (paragraph 14).

It is the view of WLBC that it may helpful to add a sentence into the policy on the presumption in favour of sustainable development to the effect that all development proposals that are not considered to be sustainable should be refused planning permission, unless there are exceptional reasons for allowing permission.

Development Management

WLBC supports the Development Management approach put forward in the draft NPPF in dealing with development proposals, especially with regard to the use of pre-application advice. WLBC have already embraced this approach, and pre-application advice in particular, and so the principle of Development Management is a welcome inclusion in the draft NPPF.

Changes to plan-making

The draft NPPF, without explicitly saying so, appears to mark a move away from the existing Local Development Framework (LDF) system for local planning policy to a Local Plan which should, ideally, be a single document. WLBC supports this move to a simpler and easier to understand system for local planning policy but would welcome this apparent change to the local planning system being confirmed more clearly, together with guidance on transition arrangements between the systems for local authorities.

In addition, the NPPF would benefit from greater clarity on the spatial aspects of plan-making as decisions on development proposals cannot be properly guided without some spatial aspect to local planning policy.

WLBC supports the changes to the tests of soundness against which a Local Plan will be examined by an Inspector, in particular the “duty to cooperate” for public bodies on planning issues that cross administrative boundaries, although more advice on this “duty” would be welcomed as the NPPF is finalised and it could be extended to other organisations, such as utilities companies.

In relation to Neighbourhood Plans, WLBC would request clarification on paragraph 51 of the draft NPPF which states that, when a Neighbourhood Plan is adopted after a Local Plan has been adopted, it will “*take precedence over the existing policies in the Local Plan for that neighbourhood, where they are in conflict.*” This appears to be contradictory to the concept that a Neighbourhood Plan should be prepared in accordance with a Local Plan.

Business and economic development

WLBC generally supports the policies proposed in the business and economic development section of the draft NPPF but are concerned over the encouragement for planning policies to avoid the long term protection of employment land or floorspace. Depending on how this is interpreted, valuable employment land could be lost to other land uses, and this loss of employment land may ultimately be detrimental to the long-term recovery and prosperity of the local economy. The loss of such sites may mean new employment land having to be identified once economic recovery is underway (potentially delaying the delivery of new employment land) and such new sites may possibly be in less sustainable locations.

Transport

WLBC consider that the transport policies in the draft NPPF could, in general, be strengthened, given that it is such a crucial area of infrastructure, and could be made more directly applicable to the level that most local planning authorities will be working at. More specific comments are provided in the enclosed response to the consultation questions.

Housing

WLBC are in general support of the housing policies within the draft NPPF, but are somewhat concerned by the proposals for the 5 year housing land supply that local planning authorities should maintain. The Council understand the need to identify an extra 20% on top of the 5 year supply to ensure choice and competition for land and do not disagree with the concept, but the Council is concerned about the potential repercussions of not being able to demonstrate a 5-year supply, as set out in paragraph 110 of the draft NPPF.

Paragraph 110 states that *“Planning permission should be granted where relevant policies are out of date, for example where a local authority cannot demonstrate an up-to-date five-year supply of deliverable housing sites”*.

This policy is significantly stricter than that previously found in PPS3 (paragraphs 69-71), which still allowed for other considerations to be taken into account even if the authority did not have a 5-year supply, and has potentially negative implications for a rural Borough such as West Lancashire.

Currently, despite the implementation of a more relaxed housing policy, the Council does not have a 5-year supply. This is primarily due to the economic recession which has slowed down development activity and impacted upon the viability of some sites which have planning permission. If the draft NPPF were to come into effect now WLBC would be unable to refuse permission for any housing developments except where they clearly contravened another key aspect of the NPPF, such as the Green Belt. This is a highly significant concern given the constraints we have in the Borough, especially in relation to infrastructure and our rural environment.

Such an application of the “presumption in favour of sustainable development” may have the unintentional consequence of allowing development that is not supported by the local community (or the local authority) to occur in inappropriate and potentially

unsustainable locations within the Borough. WLBC would request that the policy in paragraph 110 of the NPPF be amended to draw more closely from the advice currently contained within PPS3 (paragraphs 69-71), which allows a degree of local context and circumstance to influence decisions where there is not a 5-year housing land supply.

In addition, more advice should be provided on what is required of local authorities in ensuring flexibility to their 15-year housing land supply. WLBC understands that the 20% extra required for the 5-year supply will **not** be applied to the 15-year supply, but the Council struggles to see how genuine flexibility can be ensured without requiring that more land is made available for development over and above that required for the 15-year supply. This is crucial for a borough such as West Lancashire as this would ultimately mean the release of more Green Belt for development.

Green Belt

WLBC, which covers an area that is over 90% Green Belt, supports the policies proposed in the draft NPPF on the Green Belt. The Council feels that the policies could be strengthened by requiring a regular strategic, inter-authority review of Green Belt boundaries to ensure that when boundaries are amended, they are amended with the support of all authorities affected by a specific Green Belt and are amended with the long-term permanence of the boundary in mind (as per paragraphs 138 and 140 of the draft NPPF).

Flood Risk

With a significant amount of the Borough at risk of Tidal Flooding, and other areas at risk of localised flooding due to the lack of capacity in combined sewers, the Council feels that there should be greater guidance on such an important topic.

As I hope is clear from the above, WLBC is supportive of the draft NPPF and its general principles and, in particular, welcomes the encouragement of sustainable development. It is the view of WLBC that the draft NPPF can be further improved by the inclusion of a few, key amendments to draft policy, set out above and in the enclosed consultation questionnaire responses.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Harrison', with a long horizontal flourish extending to the right.

John Harrison
Borough Planner

Policy Questions

Delivering Sustainable Development

The Framework has the right approach to establishing and defining the presumption in favour of sustainable development.

1(a) – Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

1(b) Do you have comments? (please begin with relevant paragraph number)

Paragraphs 9 and 11 – WLBC agrees with the use of the Brundtland Commission’s definition of sustainable development and that the three components of sustainable development should be pursued in an integrated way. For clarity, the Council believes that the NPPF would be strengthened by incorporation of a clear statement that this definition is applied to all parts of the document.

Paragraph 14 – WLBC agrees with the concept of a presumption in favour of sustainable development but objects to the proposals within the draft NPPF to simply grant permission for a development where the plan is absent, silent, indeterminate or where relevant policies are out of date. This proposal could lead to unsustainable development in inappropriate locations which are unsupported by local communities. The Council believes that the NPPF should be amended to ensure that sufficient weight is given in the decision making to the local context regardless of whether the plan is up-to-date or not.

Plan-making

The Framework has clarified the tests of soundness, and introduces a useful additional test to ensure local plans are positively prepared to meet objectively assessed need and infrastructure requirements.

2(a) Do you agree?

- | | |
|----------------|--------------------------|
| Strongly agree | <input type="checkbox"/> |
|----------------|--------------------------|

- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

2(b) Do you have comments? (please begin with relevant paragraph number)

Paragraphs 20-26 – WLBC would like to see greater clarification on the transition arrangements between the existing LDF system and what appears to be a new Local Plans system proposed by the draft NPPF.

The policies for planning strategically across local boundaries provide a clear framework and enough flexibility for councils and other bodies to work together effectively.

2(c) Do you agree?

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

2(d) Do you have comments? (please begin with relevant paragraph number)

Paragraph 46 – WLBC supports the “duty to cooperate” but would like to see greater flexibility in relation to the way this cooperation is evidenced at an examination, with less formal evidence than that proposed in paragraph 46 being considered appropriate, especially in relation to development plan documents that are already in preparation.

Decision taking

In the policies on development management, the level of detail is appropriate.

3(a) Do you agree

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree

Strongly Disagree

3(b) Do you have comments? (please begin with relevant paragraph number)

Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government.

4(a) Do you agree

Strongly agree

Agree

Neither agree or Disagree

Disagree

Strongly Disagree

4(b) What should any separate guidance cover and who is best placed to provide it?

WLBC agrees that guidance could be provided by organisations outside the government. However, there needs to be greater clarity about which organisations would be able to produce such guidance and what weight should be attached to it. Perhaps any such guidance produced should be officially endorsed by the Government. There may be a danger in making it “light-touch” as there is a need for some consistency across the country in certain planning matters and detailed guidance ensures this consistency.

WLBC considers that there are many areas where guidance may be necessary, including most particularly on climate change (Energy Saving Trust / Carbon Trust / Envirolink), flooding (Environment Agency) and coastal change (Marine Management Organisation), the housing evidence required by the NPPF, business and economic development (especially applying market viability), retail / town centres, transport and infrastructure planning.

Business and economic development

The 'planning for business policies' will encourage economic activity and give business the certainty and confidence to invest.

5(a) Do you agree?

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

5(b) Do you have comments? (please begin with relevant paragraph number)

Paragraphs 73-75 – WLBC do agree that the draft NPPF’s policies will encourage economic activity, but further guidance to ensure that the policies are applied equally across the country may provide still greater certainty and confidence for business.

5(c) What market signals could be most useful in plan making and decisions, and how could such information be best used to inform decisions?

More guidance on economic growth projections by District in terms of numbers of jobs and in what sectors (i.e. an economic equivalent to the household projections) and how to best translate this into employment land requirements.

Guidance on what evidence it is appropriate to require of applicants to justify the loss of an employment site when they are proposing to redevelop an existing employment site for another use.

The town centre policies will enable communities to encourage retail, business and leisure development in the right locations and protect the vitality and viability of town centres.

6(a) Do you agree?

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

6(b) Do you have comments? (please begin with relevant paragraph number)

Paragraphs 76-80 – WLBC do agree that the draft NPPF’s policies will be beneficial for planning for business and economic development, but there is concern that the loss

of detail from PPS4, especially in relation to assessing retail proposals, could create inconsistent approaches across the country, and therefore inequality.

Transport

The policy on planning for transport takes the right approach.

7(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

7(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 84 – WLBC considers that the 1st bullet point should be amended to read “facilitate economic growth by taking a positive approach to planning for *improvements to sustainable transport infrastructure*”. The reasoning informing an objective where it is expected that *development*, in and of itself, will deliver sufficient sustainable transport improvements to stimulate economic growth is inaccurate.

Paragraph 85 – WLBC considers that the policy could be made more relevant to local planning authorities by also discussing the local provision of sustainable transport infrastructure to significant employment destinations.

Paragraph 86 – WLBC considers that the 3rd bullet point appears to prioritise delivery of housing and economic growth over highway safety and the accessibility / sustainability of transport connections serving the proposed development. What the NPPF defines as “severe” residual impacts should be made clear.

Communications infrastructure

Policy on communications infrastructure is adequate to allow effective communications development and technological advances.

8(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

8(b) Do you have comments? (please begin with relevant paragraph number)

Minerals

The policies on minerals planning adopt the right approach.

9(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

9(b) Do you have comments? (please begin with relevant paragraph number)

Paras 101, 102, 103 – Greater detail and guidance should be contained in this section on particular issues relating to specific mineral types – for example the Council would welcome greater guidance on the extraction of shale gas which will become a major issue in Lancashire over the next couple of years.

Housing

The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand.

10(a) Do you agree?

- | | |
|----------------|--------------------------|
| Strongly Agree | <input type="checkbox"/> |
|----------------|--------------------------|

- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

10(b) Do you have comments? (please begin with relevant paragraph number)

WLBC agree that the draft NPPF will enable the delivery of more homes to meet local demand, although would wish to express concerns that the policies may not always ensure that they are provided in the right location.

Paragraph 109 – WLBC considers that greater clarity is required on the additional allowance of 20% on top of the 5-year supply. Should this come out of the 6-10 year supply or be entirely separate? Will a similar allowance be required for the full 15-year supply in Local Plans?

Paragraph 110 – WLBC is concerned that the draft NPPF proposes to take away the ability of local planning authorities to properly determine housing applications in light of local context simply because a 5-year supply of housing cannot be demonstrated. This will inevitably lead to unsustainable housing developments in inappropriate locations against the wishes of local communities, and therefore be contrary to the localism agenda.

Planning for schools

The policy on planning for schools takes the right approach.

11(a) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

11(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 127 – WLBC recommends that there should be consideration of what impact the proposed “very significant weight” to be attached to the desirability of establishing new schools will have on unrelated existing

schools – it would seem perverse to promote a new school in this way if it results in the closure of an unrelated existing school.

Design

The policy on planning and design is appropriate and useful.

12(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

12(b) Do you have comments? (please begin with relevant paragraph number)

Green Belt

The policy on planning and the Green Belt gives a strong clear message on Green Belt protection.

13(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

13(b) Do you have comments? (please begin with relevant paragraph number)

WLBC agree that the draft NPPF gives a strong, clear message on Green Belt protection, but that it is perhaps not as strong as PPG2 and therefore could result in some inappropriate development being permitted in the Green Belt.

Paragraphs 137-140 – WLBC would like to see consideration and encouragement of sub-regional reviews of Green Belt to enable a more robust and comprehensive

review of Green Belt boundaries in a “wider-than-local” context.

Climate change, flooding and coastal change

The policy relating to climate change takes the right approach.

14(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

14(b) Do you have comments? (please begin with relevant paragraph number)

WLBC considers that further guidance on this topic is essential to ensure that the policy is delivered appropriately

The policy on renewable energy will support the delivery of renewable and low carbon energy.

14(c) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

14(d) Do you have comments? (please begin with relevant paragraph number)

WLBC considers that further guidance on this topic is essential to ensure that the policy is delivered appropriately

The draft Framework sets out clear and workable proposals for plan-making and development management for renewable and low carbon energy, including the test for

developments proposed outside of opportunity areas identified by local authorities.

14(e) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

14(f) Do you have comments? (please begin with relevant paragraph number)

WLBC considers that further guidance on this topic is essential to ensure that the policy is delivered appropriately

The policy on flooding and coastal change provides the right level of protection.

14(g) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

14(h) Do you have comments? (please begin with relevant paragraph number)

WLBC considers that further guidance on this topic is essential to ensure that the policy is delivered appropriately and that important detailed guidance currently within PPS25 and its accompanying companion guide is not lost. Flood risk is a major issue in West Lancashire.

Natural and Local Environment

Policy relating to the natural and local environment provides the appropriate framework to protect and enhance the environment.

15(a) Do you agree?

- | | |
|----------------|--------------------------|
| Strongly Agree | <input type="checkbox"/> |
|----------------|--------------------------|

- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

15(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 167 – WLBC considers that greater emphasis should be placed on protecting agricultural land for the needs of future generations and to improve the UK's ability to be self-sustaining.

Historic Environment

This policy provides the right level of protection for heritage assets.

16(a) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

16(b) Do you have comments? (please begin with relevant paragraph number)

Impact Assessment Questions

Impact assessment

The Framework is also accompanied by an impact assessment. There are more detailed questions on the assessment that you may wish to answer to help us collect further evidence to inform our final assessment. If you do not wish to answer the detailed questions, you may provide general comments on the assessment in response to the following question:

17a. Is the impact assessment a fair and reasonable representation of the costs, benefits and impacts of introducing the Framework?

See answers to questions below

Planning for Travellers

18 Do you have views on the consistency of the draft Framework with the draft planning policy for traveller sites, or any other comments about the Government's plans to incorporate planning policy on traveller sites into the final National Planning Policy Framework?

No

Specific questions on the impact assessment

QA1: We welcome views on this Impact Assessment and the assumptions/estimates contained within it about the impact of the National Planning Policy Framework on economic, environmental and social outcomes. More detailed questions follow throughout the document.

No comments

QA2: Are there any broad categories of costs or benefits that have not been included here and which may arise from the consolidation brought about by the National Planning Policy Framework?

Potential for loss of detailed guidance on particular matters due to streamlining of policies leaving local authorities exposed to developer pressures. This could lead to a greater uncertainty in decision-making, leading to more planning appeals.

QA3: Are the assumptions and estimates regarding wage rates and time spent familiarising with the National Planning Policy Framework reasonable? Can you provide evidence of the number of agents affected?

The familiarisation time of 3 to 4 hours per person seems to be on the low side given that different cases will present different challenges as to how the NPPF will be interpreted. We would suggest that this would be a rather longer ongoing familiarisation process which is difficult to quantify as a fixed number of hours.

QA4: Can you provide further evidence to inform our assumptions regarding wage rates and likely time savings from consolidated national policy?

Agree with the notion that consolidating national policy will save between 2.5 to 4 hours per planning application, once officers are familiar with the NPPF. No further evidence to offer at this stage.

QA5: What behavioural impact do you expect on the number of applications and appeals?

It is considered that the number of applications may increase from the number currently received as despite wider economic factors, there will be more speculative applications. It is further considered that this will result in the number of appeals rising due to discrepancies in interpretation of the NPPF in the early days and the increase in speculative applications.

QA6: What do you think the impact will be on the above costs to applicants?

Impact on costs to applicants will be minimal as the consideration of National Policy is only part of the process, the more detailed local policy agenda will continue to be a major consideration when preparing an application. However, more appeals will ultimately mean higher costs for those applicants affected.

QA7: Do you have views on any other risks or wider benefits of the proposal to consolidate national policy?

No further views.

QB1.1: What impact do you think the presumption will have on:

- (i) the number of planning applications;
- (ii) the approval rate; and
- (iii) the speed of decision-making?

In the longer term the presumption in favour of sustainable development is likely to have a positive impact on the number of planning applications, the approval rate and the speed of decision making. In the shorter term, however, there is likely to be some confusion. Developers will clearly see this as an opportunity for pursuing their interests and are likely to submit more applications, however until a clear policy agenda has been interpreted and fully understood by officers at a local level, the approval rate and speed of decision making is likely to decrease for a period, or perhaps remain steady. An increase in the number of appeals will only slow the ultimate speed of decision making further. Guidance and support for local authorities during this stage will be crucial, but the ability to interpret such a presumption flexibly at a local level will be equally as important.

QB1.2: What impact, if any, do you think the presumption will have on:

- (i) the overall costs of plan production incurred by local planning authorities?
- (ii) engagement by business?
- (iii) the number and type of neighbourhood plans produced?

Many LPAs are at an advanced stage in the production of their Core Strategies, if they have not already been adopted. As a result, any changes in the nature of 'local plans' or LDFs as a result of the presumption in favour of sustainable development will have significant costs in terms of plan production and the necessary amendments to be made. It would be helpful if more guidance could be produced at Central Government level demonstrating how cost implications could be reduced i.e. could some of the requirements associated with the presumption be built into existing Core Strategies where drafts are in progress in order to increase the life of the document thereby reducing immediate costs?

The presumption is likely to have a positive impact on engagement with businesses, particularly as there may be new development opportunities to follow up. However, with constant public consultation on ever changing policy approaches some will inevitably become frustrated with and perhaps disinterested in the latest changes.

The presumption may lead to more neighbourhood plans as local communities and businesses will see this as an

opportunity for development. However, thus far, in West Lancashire there has been little interest in Neighbourhood Plans because of the costly and onerous preparation process and because most communities want less development, not more.

QB1.3: What impact do you think the presumption in favour of sustainable development will have on the balance between economic, environmental and social outcomes?

Economic and social factors are likely to be impacted in a positive manner as a result of the presumption in favour of sustainable development, particularly economic factors. It is likely that streamlining policies will encourage more economic and residential development, though LPAs need to ensure that existing employment sites are not all lost to more profitable housing development. We have greater concerns regarding the environment, particularly in areas which are more rural in nature and those which have a significant historic environment. In such areas the presumption may have a more negative impact and LPAs will need to carefully consider how to manage this at a local level. Ultimately, the proposed approach to implementing the presumption in the NPPF may lead to more unsustainable development.

QB1.4: What impact, if any, do you think the presumption will have on the number of planning appeals?

Overall, the presumption should have a positive impact on development and the positive determination of planning applications. However, during the transition period as LPAs create and familiarise themselves with the new approach there may be a temporary rise in the number of appeals. Even after the transition period, it is likely that some conflict will remain in relation to the natural and historic environment and conflict between existing uses. It is possible that this rise in appeals, especially initially, will be quite significant.

QB2.1: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

Yes. Whilst including office uses in the town centre policy has been beneficial in some respects, it is realistic to reduce restrictions on the future development of this use in line with market demands. Indeed some areas do not

benefit from a policy which specifies that office space can only be located centrally, particularly in more rural Boroughs. Caution needs to be had, however, to ensure that such development is only allowed in sustainable locations and this is identified within the impact assessment.

QB2.2: Is 10 years the right time horizon for assessing impacts?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

Yes. 10 years is a more realistic time frame for assessing the full impacts of a scheme. This will be particularly relevant during the crucial post recession era.

QB2.3: How much resource would it cost to develop an evidence base and adopt a local parking standards policy?

Resource costs are likely to be significant at the outset in terms of survey work, assessment of existing parking provision, location/accessibility, public consultation and preparing a policy. However, the benefits of having a locally specific requirement would outweigh the costs in the longer term. Again, some guidance or parameters at a central level would be helpful in determining local parking standards, and demonstrate the government's commitment to discouraging the use of private vehicles and encouraging sustainable modes of transport.

QB2.4: As a local council, at what level will you set your local parking standards, compared with the current national standards?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

As a largely rural local council with relatively poor public transport links, it will be beneficial to have the flexibility to tailor parking standards to suit local needs. Given the relatively remote location of the Borough, benefits such as fewer parking restrictions would assist greatly in attracting new employment development to the area in future. Therefore, in certain parts of the Borough the Council may be inclined to increase parking standards compared to the current national standards.

The impact assessment presents a fair representation of the costs and benefits.

QB2.5: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy changes on minerals?

Yes.

QB3.1: What impact do you think removing the national target for brownfield development will have on the housing land supply in your area? Are you minded to change your approach?

In a largely rural Borough, removing the national target for brownfield will not have a major impact. Existing towns and villages are already greatly constrained by the Green Belt and there is very little land left within the majority of existing settlements to accommodate new development. Having said that, there are some areas where a brownfield land target should be kept high in order to facilitate regeneration and avoid a situation of 'easy wins' for developers who prefer greenfield sites rather than contaminated brownfield sites.

The Council would continue with its current approach, prioritising brownfield land where ever possible in order to meet housing targets sustainably.

QB3.2: Will the requirement to identify 20% additional land for housing be achievable? And what additional resources will be incurred to identify it? Will this requirement help the delivery of homes?

The identification of 20% additional land for homes is a sensible approach in order to plan ahead in terms of housing delivery. In practical terms, however, this may be more difficult to achieve and manage in some Boroughs, for example those which usually have a lot of windfall development and those, such as West Lancashire, that are severely constrained. The current economic climate also makes it very difficult to achieve a 5 year supply, let alone 20% extra. Additional resources are not considered to be significant given the detailed work which already goes into the SHLAA. However, if this additional 20% is applied to the full 15-year supply of a Local Plan, it will require additional resource in preparing the Local Plan.

QB3.3: Will you change your local affordable housing threshold in the light of the changes proposed? How?

A more flexible approach to affordable housing requirements is welcomed. Whilst we would not look to provide less affordable housing overall, it would be beneficial to require less in areas which are in need of regeneration where developers can make contributions in terms of other planning obligations. Affordable housing thresholds with no flexibility make it difficult to direct development to weaker housing market areas which are most in need of investment. However, WLBC has already considered this in preparing its Core Strategy.

QB3.4: Will you change your approach to the delivery of affordable housing in rural areas in light of the proposed changes?

Whilst ensuring that varied housing is made available to rural communities, the Council will continue to consider the benefits and disadvantages of development in environmentally sensitive locations. Where developer contributions can mitigate such impacts there may be a case for developing some market housing, along with affordable housing but demand levels would need to be assessed in detail. A further complication for WLBC is that our rural areas are also Green Belt.

QB3.5: How much resource would it cost local councils to develop an evidence base and adopt a community facilities policy?

As this is a new policy area, it would take rather a lot of resource to assess existing provision in terms of availability and viability, consult with the public and produce a new community facilities policy. It is, however, difficult to identify a specific figure for this, and some of this work has already taken place in preparing the IDP.

QB3.6: How much resource would it cost developers to develop an evidence base to justify loss of the building or development previously used by community facilities?

Similarly to the response to QB3.5, developers would incur a cost to provide the same level of detail as part of an evidence base.

QB3.7: Do you think the impact assessment presents a fair representation of the costs and benefits of the Green Belt policies set out in the Framework?

Generally the impact assessment seems to be fair, although it is rather light on the impact on the environment and open nature of the Green Belt. There should be more emphasis on how local councils should protect the existing qualities of the Green Belt and weigh these up against the benefits of, for example, a new transport interchange.

QB4.1: What are the resource implications of the new approach to green infrastructure?

The new policy approach to green infrastructure appears to be very vague stating only that LPAs will be encouraged to take a more strategic view of green infrastructure provision. There is no guidance as to how this will differ from the current approach and it is stated that the preferred option will not require LPAs to gather new evidence. The resource implications and impacts of this policy change are therefore unclear. This policy approach requires further clarification.

QB4.2: What impact will the Local Green Space designation policy have, and is the policy's intention sufficiently clearly defined?

The Local Green Space designation policy will make it easier to protect locally valued green spaces from development. This is particularly important in rural Boroughs where development pressures are high. The concern, however, is that local green spaces need to be considered carefully in terms of their value and weighed up against the potential loss of Green Belt in order to meet development needs. The policy's intention is sufficiently defined.

QB4.3: Are there resource implications from the clarification that wildlife sites should be given the same protection as European sites?

There will be resource implications in monitoring potential/emerging European sites, however these are deemed to be minimal and the overall approach is

supported.

QB4.4: How will your approach to decentralised energy change as a result of this policy change?

A change to a more flexible policy approach to decentralised energy is welcomed. Whilst this remains an important priority, some flexibility is helpful in order to ensure that such schemes can be applied in suitable locations, where viable and deliverable. Removing overall 'targets' is therefore supported. The Council's policy approach will be considered in light of the above.

QB4.5 Will your approach to renewable energy change as a result of this policy?

Identifying broad areas would certainly help to strategically plan for large scale renewable energy developments and infrastructure. However, there needs to be some recognition that smaller scale provision may vary depending on specific sites and viability. Additional flexibility in this regard will be important and our policy approach will seek to reflect this.

QB4.6: Will your approach to monitoring the impact of planning and development on the historic environment change as a result of the removal of this policy?

The Council's approach is unlikely to change as the changes recently made to the PPS5 will be carried forward and monitoring is already carried out.