

Supporting Evidence for Request to Review Adequacy of Petition Response

**Presented to the
Executive Overview and Scrutiny
Committee, West Lancashire
Borough Council**

On 29th March 2012

by Mrs Gillian Bjork

On behalf of Burscough Action Group

Dear Members of the Executive Overview and Scrutiny Committee,

This document has been compiled following receipt of the Borough Planners response to concerns raised in the petition regarding proposed developments, then referred to as 'Option1' and 'Option2' of the Local Development Framework, that was submitted to the Council on 15th December 2011.

The response by the Borough Planner understandably was based on information contained within the Local Plan and its supporting documents. However as the lead petitioner I have grave concerns regarding the accuracy and validity of the evidence relied upon by the Council in identifying Green Belt Land at Yew Tree Farm site, as a 'Strategic Site' for development within the Local Plan. I believe that the processes used by the planning department have not been fair and equitable when considering parcels of land throughout the Borough, to the detriment of Burscough.

Members of the Burscough Action Group have gathered evidence, taken from the Council's documents to support these claims, and the evidence is clearly set out before you for your consideration in this document.

As I am sure you will appreciate, the supporting documents to the Local Plan are numerous, and the evidence I am presenting to you today is simply a culmination of the evidence gathered so far, and is by no means exhaustive.

I trust you will take time to consider the evidence enclosed in this document, and will in turn choose to re-examine the quality of information the Borough Council has relied upon in identifying Green Belt Land in Burscough as a 'Strategic Site' for development within the Borough, and in turn the evidence the Borough Council have relied upon in responding to the petitions concerns.

Yours Sincerely,

Mrs Gillian Bjork

On behalf of Burscough Action Group

1. Surface water flooding (plus notes on fluvial flooding)

Given that the experience of local residents is that surface water flooding in Burscough is almost a yearly event, also given that, PPS25 states that loss of permeable green land to building will exacerbate surface water flooding. The following omissions have led to flawed conclusions and the selection of an unsuitable development site at Yew Tree Farm in the Local Plan:

- a. A prohibitive constraint should be placed on development at the Yew Tree Farm site, because of the increased risk of non-fluvial flooding and the relatively higher risk of flood from fluvial and tidal sources in this location than compared to Skelmersdale and Ormskirk. As evidenced by the Strategic Flood Risk Assessment (SFRA) 2010, United Utilities DG5 Register and the Sustainable Settlement Study:

- Section 4.4.3 of the SFRA 2010 states:

"No development can currently be supported in Burscough due to the constraints on infrastructure and the increased risk of non-fluvial flooding. The preferred option will need to indicate how these issues will be resolved."

- Note: Section 4.4.1 of the SFRA 2010 states: *"Burscough is the lowest lying of all three main settlements . . . in close proximity to high flood risk areas . . . Therefore, it should be noted that although flooding from fluvial and tidal sources is considered to be low, the risks are greater in this location than that of both Skelmersdale and Ormskirk."*

- The DG5 Register relates to surface and foul water sewer flooding and is held by United Utilities in a register that forms the Director General of OFWATs Report on Issue Number 5, hence 'DG5 Register'. This Register records the number of properties reported to have been affected by flooding both internally and/or externally due to hydraulic inadequacy of the public sewerage system.



The map shows the current distribution of properties / areas on the DG5 Register. The larger the circle, the more properties.

The DG5 Register clearly shows that the land at Yew Tree Farm is already at significant risk from flooding; see illustration of DG5 Register, and indicates that only Parbold in the district has had as many houses affected by flooding.

- Section 5.59 of the West Lancashire Local Development Framework Sustainable Settlement Study states:

"Burscough has a very minor risk of flooding, with an area of the Leeds-Liverpool canal having been identified as a risk."

- b. The Strategic Flood Risk Assessment (SFRA) 2011 fails to robustly identify the risks outlined in the 2010 study, the Sustainable Settlement Study and the evidence in the DG5 Register, fails to indicate how these issues will be resolved in the preferred option and fails to indicate the

3. School places

The plan classes Burscough as a key service centre. Section 3.10 of the West Lancashire Local Development Framework Sustainable Settlement Study states:

"Key service centres are considered to have a significant number of key services and facilities, including a good range of retail and service provision that can meet day to day needs, particularly for convenience shopping. It will also provide a primary school and access to a secondary school, local employment, GP surgery, playing areas/fields and frequent public transport provision."

There is one secondary school in Burscough and it is oversubscribed, a rapid increase in population such as the planned 500 to 1000 houses at Yew Tree Farm, plus 350 elsewhere in Burscough, 250 at Grove Farm and additional houses through the potential plan B, would require significant expansion of the existing school or a new school.

Whilst it is appreciated that that a borough-wide approach is taken to secondary school places, as a key service centre the plan has been remiss not to consider this issue with respect to the development in and around Burscough:

- a. There is no evidence presented regarding the current situation with secondary school places and what impact any proposed development will have on the existing schools. There is no provision in the plan for developer contributions for a secondary school.
- b. Given the situation with the one secondary school in Burscough, consideration should be given to the social and transport issues with increased journeys to secondary schools:
 - i. More children will need transport to their nearest suitable school incurring travel expenses (under the current system).
 - ii. More children being transported, rather than walking, to their nearest suitable school will exacerbate congestion around the borough.
 - iii. More vehicles being used will exacerbate pollution around the borough.
 - iv. More children being transported, rather than walking, to their nearest suitable school will exacerbate well publicised health issues in our children.

5. Green belt

The green belt at Yew Tree Farm is currently used for agriculture and contains many miles of mature hedgerows. It is a feeding ground for protected birds, such as pink footed geese, that also visit nearby Martin Mere. It is crossed and bounded with well used rights of way that enable residents to access the open country. It is a precious asset that is beneficial to the economy, tourism, wildlife and well being of Burscough. This is stated here because the Green Belt Study appears to be so biased that this information is buried in the study and only known to local residents. A reasoned sensible decision cannot be made on the future of the green belt around Yew Tree Farm using the Green Belt Study because of mistakes and bias contained in that study that have filtered through to the Local Plan.

- a. How can decisions be made on a report which has no independent validation?

WLBC state:

"We are carrying out the study jointly with Knowsley and Sefton Councils, who have appointed independent consultants to validate each stage of the assessment process. In our case the assessment has been validated by LCC rather than by consultants."

Independent validation would have helped avoid any bias. The study shows clear evidence of bias towards sites which are, at the conclusion, earmarked for development in the Local Plan despite its claim in Section 1.11:

"This study will not identify specific sites which will be allocated for development in the future."

Reference is made to a validation process in Section 1.10 but there is no supporting information. These omissions detract from public confidence in the findings. We request that the assessment is validated by independent consultants to ensure an unbiased, consistent approach to the sieving of parcels.

- b. The study manipulates the categorisation of the settlements in West Lancs to support parcel inclusion and removal. Burscough is misrepresented within the study and described as a 'large built-up area' in order to assess it against purpose one of PPG2 and a 'main settlement', 'market town' and 'service centre' similar to Skelmersdale and Ormskirk/Aughton to justify developing its green belt.

- i. In Section 5.8 the study states:

"Although West Lancashire is located between the large built up areas of Merseyside (including Sefton and Knowsley), Greater Manchester and Central Lancashire, only some of the settlements within the Borough can be considered as 'large built-up areas'. These include Skelmersdale, Ormskirk / Aughton and Burscough. As PPG2 does not give a definition of 'large built up areas', it would be inappropriate to consider the smaller rural settlements as large built-up areas and to assess land around them against Purpose One which clearly states it is 'to check the unrestricted sprawl of large built-up areas'."

There is no clear logic in this statement: the location of West Lancashire has no bearing on the labelling of the settlements and the lack of definition of the term 'large built up areas'

The study identifies the parcels by '*character and land use; and clearly defined and durable physical boundaries*', the final study removed '*impact on openness*' as a criteria despite PPG2 stating that a key attribute of including land in the green belt is its openness.

Nonetheless these criteria would have been used in choosing the original parcel allocations in the draft study.

- i. In an email on the 25th January 2012, Peter Richards, LDF Team Leader, explained the parcel creation as:

"The parcel is ... established by moving away from the existing Green Belt boundary and into the Green Belt to the most logical, clear and strong boundary."

Parcels BUR08, 09, 10, 11 and 12 contain three streams which are logical, clear and strong physical boundaries which have been ignored. When questioned about this Gillian Whitfield, Principal Planner - LDF Team said:

"The parcels were initially drawn using an Ordinance Survey (OS) Map which shows, in the case of parcel BUR.10, from the rear of the properties on Liverpool Road, moving westerly towards the industrial area, the drain that was selected is the strongest, most complete and logical boundary. I note that for Parcel BUR.09 there does appear to be a complete boundary closer to the residential property on Liverpool Road, but for the purpose of this study this was not considered to be as strong as the boundary that was selected. It is likely that continuity between both parcels has formed part of this initial parcelling decision."

The boundary that was selected in preference to stream (a durable feature by the criteria used in the Green Belt Study) was nearly a kilometre to the West, the majority of it is formed by a field boundary and the remains of a fence and the rest by a fence on the edge of the Tollgate industrial estate, by the criteria used in the Green Belt Study, all features lacking durability.

The character and land use of these fields has also been ignored. For instance BUR10 comprises two contrasting characteristics: derelict farm buildings and land to the East (this land has all been neglected while it has been the subject of many planning applications) and large fields, mostly in agricultural use (or were until this year), separated by hedges, paths, ditches and streams to the West.

Had the parcels been chosen using '*character and land use; and clearly defined and durable physical boundaries*' smaller parcels would have been chosen, subdividing the plot; this would have possibly resulted in a smaller plots earmarked for likely removal from the green belt. Instead the decision to favour large parcels, which are contained by design, using boundaries which are strengthened by association with neighbouring parcels prejudices the likelihood that the parcels will go on to stage two of the assessment and ultimately be removed from Green Belt.

- *To assist in safeguarding the countryside from encroachment*
The land protects agricultural activities, provides a feeding ground for indigenous and migrating wildlife and encourages recreational use of the countryside. Please see the supporting comments in 6 *Loss of amenities, wildlife habitat and heritage*.
- *To preserve the setting and special character of historic towns*
The land helps protect the unique character of Burscough's rural community and its historic pattern of development as a linear settlement.

The Strategic Flood Risk Assessment (SFRA) 2011 describes Burscough as:

"Burscough is a historic market town and has seen significant growth over recent decades."

Many listed buildings of a rural nature will be affected by this development, in particular, Mill Dam Lane End Farmhouse, Yew Tree House and 172 Liverpool Road South.

The southern end of the site is landscape in the immediate vicinity of these listed building so can be considered as curtilage, given that the natural setting of these building would be adjacent to fields. This land clearly still fulfils these objectives and according to PPG2 Section 1.7 should still be protected:

"The purposes of including land in Green Belts are of paramount importance to their continued protection, and should take precedence over the land use objectives."

- ii. Had the study not ignored the presence of New Lane, BUR14/12/11 and 10 would have all been removed from the study by failing purpose two because of their proximity to New Lane being less than 1km. New Lane has an identity in its own right which is already threatened by encroaching housing estates along the canal and the proximity of the industrial estate. This omission needs to be rectified.
- f. In Stage 2 of The Green Belt Study, I question the impartiality of the approach taken. There is an evident bias in the report towards development of the Yew Tree Farm site:
- i. The study does not judge each parcel in BUR08/ 09/ 10/ 11 and 12 on its own merits but instead amends the judgement for each parcel in the context of the wider parcels within the Yew Tree Farm site. Usually this approach prejudices the parcel being moved to the next stage.

See evidence in the Stage 2 results in the appendices of the study, where comments such as *'The parcel alone is partly contained but when taken with the wider parcels it is well contained.'*, and *'Alone the boundary would be weaker but collectively with parcels 8,9,11,12 the boundary would be stronger.'* are common when considering purposes 1a and b. Also consider Gillian Whitfield's reference to BUR09/10 as *'It is likely that continuity between both parcels has formed part of this initial parcelling decision.'*

This treatment is unique to this group of parcels and is clearly a biased assessment.

- ii. When compared with other parcels, similar scenarios in BUR08/ 09/ 10/ 11 and 12 are treated differently. For instance comparing BUR10 to a similar parcel elsewhere APB10:

	BUR10	APB10
Purpose 1a To check the unrestricted sprawl of large built up areas	Partly contained Comments The parcel alone is partly contained but when taken with the wider parcels it is well contained.	Not contained Comments Parcel is largely remote from the urban area, but adjoins to the south (Skull House Lane).
Purpose 1b Does the parcel have strong and defensible boundaries?	weaker GB boundaries Comments Existing boundary (rear of dwellings and Higgins lane) is stronger than new boundary, hedges and sporadic tree line. Alone the boundary would be weaker but collectively with parcels 8, 9, 11, 12 the boundary would be stronger.	weaker GB boundaries Comments This site currently has strong Green Belt boundaries with the existing roads

BUR10 is bounded on one and a half sides by residential dwellings and described as 'partly contained' whereas APB10 is bounded on two sides by residential dwellings and industrial area and is described as 'not contained'. This is clearly a biased judgement and should be addressed.

Both BUR10 and APB10 are described as having 'weaker GB boundaries' but the case for BUR10 is strengthened by a comment about considering the parcels collectively with BUR08, 09, 11 and 12. No such comment is made for APB10 but consideration with APB03 and would have created a much stronger boundary. This approach is unique to this group of parcels and is clearly a biased judgement and should be addressed.

- iii. Purpose three of PPG2 specifically takes no account of land condition or dereliction. Stage 2 consistently uses words such as 'no clear use', 'neglected', 'disused', 'dilapidated', 'unmanaged' as evidence. Much of this description is inaccurate and this is addressed overleaf, but its use is symptomatic of a biased approach.

If a land owner wished to sell their green belt land for development they simply need to neglect it. For instance some of the fields within the Yew Tree Farm site appear not to have been fertilised or planted for the forthcoming season. The derelict farm at the site has been neglected and vandalised while multiple planning applications have been put forward. The landowner clearly desires to develop this land, the study should be impartial to this, and instead it has allowing supporting material from the land owner to influence the assessment. This approach puts all green belt land in private ownership at risk.

- g. In Stage 2 of The Green Belt Study, looking at purpose 3, referring to the evidence and results in the appendices. There are several omissions and inaccurate statements. Please see the table below, where corrections are highlighted based on observation, OS and aerial maps.

Note that with the omissions and inaccuracies rectified BUR08, 09 and 10 would be ruled out at purpose 3. These corrections clearly need to be addressed and the conclusions revisited.

Purpose 3 Inaccuracies	BUR08	BUR09	BUR10	BUR11	BUR12
Purpose 3a To assist in safeguarding the countryside from encroachment	<10%	<10%	10-25% <10%	10-25%	<10%
	A small garage associated with residential on southern boundary. Looks like curtilage extension into Green Belt area	There are no buildings in this parcel	The parcel contains a disused and delapidated farm house predates GB and occupies much less than 10%	There are some industrial units in the north western corner	There are no buildings within the parcel.
Purpose 3b Building use	Partial countryside use	Countryside use	Countryside use	Partial countryside use	Countryside use
	A small garage associated with residential on southern boundary. Looks like curtilage extension into Green Belt area (non countryside use but pre-dates Green Belt) Not valid reasoning, as included in original GB	There are no buildings in this parcel	The parcel contains a disused and delapidated farm house	There are some industrial units in the north western corner	There are no buildings within the parcel.
Purpose 3c Land use observations	<25% in defined countryside use >50%	25-50% in defined countryside use >50%	<25% in defined countryside use >50%	<25% in defined countryside use >50%	<25% in defined countryside use
	The parcel is open land no clear use, potentially local dog walkers. Ploughed land in agricultural use, with paddocks and mill pond to the South.	Open land no clear use Agricultural use. Ploughed, planted, harvested and fertilised year on year. Paths used by walkers, joggers, dog owners and bird watchers.	Disused farm buildings land not farmed. Open and overgrown some boundary hedges within the site for segregation Agricultural use. Normally fertilised, ploughed, planted and harvested. Paths used by walkers, joggers, dog owners and bird watchers.	The parcel is an open field, unmanaged with no clear use. Agricultural use. Normally fertilised, ploughed, planted and harvested.	The parcel is an open field, unmanaged with no clear use.

- h. In Stage 3, there is an evident bias in the report towards development of the Yew Tree Farm site. Section 6.51 makes reference once again to the value of considering parcels BUR08, 09, 10, 11 and 12 together. No other sites are treated in this way.

In Table 6.4 Section 6.51 for BUR08, 09, 10, 11 and 12 there are numerous constraints that have been omitted here yet included in other parcels and additional comments that need to be included:

- i. Prohibitive constraint: suffers from surface water flooding
 - ii. Restrictive constraint: Agricultural land grades 2 and 3a, see 5j below
 - iii. Restrictive constraint: Listed buildings
 - iv. Restrictive constraint: TPOs, mature trees and protected hedgerows
 - v. Restrictive constraint: Feeding and breeding ground for protected species
 - vi. Restrictive constraint: Delay of eight years to implement waste water infrastructure
 - vii. Comments: Will have a negative impact on already congested roads A59 and A5209
 - viii. Potential for infrastructure improvements is presented as a benefit when it is a necessity as surface water drainage, wastewater system and roads are already issues awaiting resolution. Developer contributions are a benefit to all developments not just these parcels.
- i. In Stage 3, we question the use of soil grading as a constraint without qualification, and I question the consistency of evidence used in relation to soil grading.
- i. According to Page 39 ORM.01, 6.14 Summary West Lancashire Local Plan Green Belt Study December 2011:

"The main restriction relating to ORM.01, aside from waste water issues which could be mitigated, is the presence of grade 1 agricultural land and the requirement to protect this important resource. Consequently, other parcels, not containing the best grade agricultural land should be considered first."

The reason that this statement is flawed is because this one constraint is introduced without qualification (A) and without accurate evidence (B) and by doing so it excludes most of the land encompassing option A from the possibility of selection and includes BUR08-12 even though it is also valuable agricultural land.

A) Qualification; English Nature describe the best quality agricultural land as grades 1 through 3a. Meaningful comparisons between ALC grades 1, 2 and 3a can only be made if the size of the land and the size of the farm taken into account.

"The ALC is a basis for assessing how development proposals affect agriculture within the planning system, but it is not the sole consideration. Local planning authorities are guided by PPS7 to also take into account the value of land in agriculture, for example for its environmental or heritage attributes. Other factors include impact on farm size" Natural England Technical Information Note TIN049 Agricultural Land

6. Loss of amenities, wildlife habitat and heritage

The following issues need to be addressed:

- a. When assessing the Yew Tree Farm development Policy SP1 ignores Section 1.23 of the District Council's Heritage Conservation Strategy:

"The principal aims of the Strategy are: To preserve and enhance the District's built heritage, archaeology and historic landscapes"

It also ignores Policy EN5:

"Applications for planning permission /Listed Building Consent will only be approved if they will not have a detrimental effect upon the setting of the Listed Building."

Where sites are allocated which have potential impacts upon heritage assets appropriate mitigation measures should be specified. Policy SP3 for the Yew Tree Farm strategic development site should refer to the need to consider impact on the setting of the listed buildings on its southern boundary, there are three grade II listed buildings on the edge of Yew Tree Farm which will be directly affected.

Please see the letter from Judith Nelson of English Heritage dated 7th February 2012, sent to Peter Richards, overleaf.

- b. No consideration is given to the loss of mature trees, there are many particularly on the boundaries of the site; yet mature trees, hedges and TPOs were listed as restrictive at other sites. The site contains many hedgerows, some of which are at least 20 metres in length, many of which are over 30 years old, contain mixed species of plant and are adjacent to a bridleway or footpath. As such they are protected by the Hedgerows Regulations 1997; this should be given due consideration.
- c. Despite the Habitat Regulations Assessment (HRA) study, no consideration was given to the loss of Yew Tree Farm site as a wildlife habitat. There are a number of protected species that benefit from the green belt at Yew Tree Farm including: brown hare, partridge, swallows, sky larks, pink-footed geese, whopper swan, bats and barn owls.

In the HRA of the potential effects of the Local Development Framework (LDF) Core Strategy (of which Burscough green belt is part), on the Natural 2000 network and Ramsar Sites in the area, including Martin Mere. URS/Scott Wilson highlighted their concerns at the cumulative loss of agricultural fields resulting in the loss of supporting habitat for qualifying bird species such as pink-footed geese and whopper swan. Concerns are also raised about the effects of wind turbines and CHP.

The Local Plan has now increased the size of the development at this site so detailed assessment is of crucial importance.



ENGLISH HERITAGE

NORTH WEST

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West Lancashire
L39 2DF

Our ref: 822
Your ref: HR/LP

Telephone: 0161 242 1423

7th February 2012

Dear Mr Richards

West Lancashire Local Plan: Preferred Options

Thank you for your letter dated 3rd January 2012 consulting English Heritage on the above document and I note the changes in the document to a Local Plan.

Heritage at Risk

Whilst the National Planning Policy Framework remains to be finalised both it and PPS5 require local planning authorities to set out a strategy for the conservation and enjoyment of the historic environment. Policy EN4 in the document Preserving and Enhancing West Lancashire's Built Environment addresses this however as both the draft NPPF and PPS5 make particular reference to heritage at risk I suggest that the document should set out the Borough's approach to heritage at risk. The 2011 Heritage at Risk Register included 10 entries for West Lancashire with particularly challenging issues associated with the heritage assets at Scarisbrick Hall. It is suggested that the Local Plan covers how the conservation and enjoyment of these heritage assets will be addressed and that this is a Key Issue for the Borough.

Policy SP1

This policy identifies three specific sites for development and includes land at Yew Tree Farm, you will be aware of the grade II listed buildings located to the south of the allocated site. We note that the policy includes the protection and enhancement of heritage assets and suggest that where sites are allocated which have potential impacts upon heritage assets appropriate mitigation measures are specified in the document. So for example Policy SP3 for the Yew Tree Farm strategic development site should refer to the need to consider impact on the setting of the listed buildings on its southern boundary.



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5PW

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Policy GN1

This policy covers settlement boundaries and it is suggested that section a) in addition to nature conservation also covers impact on the historic environment, heritage assets and their settings. Open spaces within settlement boundaries can make an important contribution to local character and distinctiveness. This is often noted in Conservation Area Appraisals but can be important in places without conservation area status. This should be covered in paragraph 5.8 with bullets on the impacts on the character and appearance of the settlement and the setting of heritage assets and the contribution of the area/open space to local character.

Policy GN3

This policy requires a high standard of design and sets out a number of criteria. Whilst section 5 covers the natural environment there is no section on the historic environment. The first part of EN4 also addresses Quality Design and it may be confusing having design addressed in two separate policies. It is suggested that policy GN3 include a specific section on the design considerations required when developing in historic places.

Policy EC2

This policy includes reference to our guidance on the conversion of traditional farm buildings; you may wish to consider adding our recent guidance on *The Maintenance and Repair of Traditional Farm Buildings: A Guide to Good Practice*

Policy EN2

We support the references to historic landscapes in this policy and the identification of Areas of Landscape History Importance on the proposals map.

Appendix G

Site EC3(iii) – the development of this site should consider impact on the setting of nearby listed buildings.

Site EC3(iv) – the development of this site should consider impact on the setting of nearby listed building

Site EC3(ii) – this site includes the grade II listed station house, the plan should set out how this building and its setting is to be conserved and enhanced

EC1(b)(x) – the development of this site should consider impact on the setting of nearby listed building.

I hope these comments and suggestions will be helpful in developing the local plan.

Yours sincerely

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Planner – North West

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7. Housing

The Yew Tree Farm development is planned to meet the housing needs of the borough, in particular the need for affordable housing. There are two major issues with the plan regarding housing:

- a. Why does the plan avoid putting affordable housing where it is needed?

In 2006, 378 households were unable to move due to affordability issues in Burscough, whereas in Ormskirk and Aughton 1609 households, over four times the number in Burscough, were unable to move due to affordability issues, see Figure 11 on Page 33 of West Lancashire Rural Economy Study 2006.

The need for affordable housing is four times as great in Ormskirk and Aughton as it is in Burscough. Yet the plan proposes to build considerably more houses in Burscough than in Ormskirk.

This approach will encourage population migration with associated social, congestion and pollution issues and necessitate a revised Local Plan to place houses where they are needed.

- b. Why has the plan decided to force a large increase in population of Burscough without 'open' consultation with the affected population regarding this intent?

It is clear from the Local Plan that there is an underlying intention to develop Burscough into a similar sized settlement to Skelmersdale and Ormskirk / Aughton. This will irrevocably change the character of Burscough.

Given that all of the studies into housing need have looked at the needs of the individual settlements, why has this been ignored in the Local Plan?

The Core Strategy sought to consult on different options but ignored the overwhelming objections from Burscough. Instead the Conclusion of Core Strategy Preferred Options Consultation Feedback Report, November 2011 gives misleading comments about the support for Burscough Option, in Section 1.4, the second point within the analysis of the comments states:

"Analysis of the comments received make it clear that: ...The highest level of support for green belt release was for the Burscough Option".

But neglected to say that the highest level of objections for green belt release was also for the Burscough Option 3.116, p36.

This objection has been further compounded by a petition which so far has 1,600 objections to aggressive Burscough development.

As already discussed Burscough is relatively small compared to Ormskirk/Aughton and so will not form the majority of respondents in the report, looking at picture 3.2 in Section 3.79, 5/6 of the people who voted for development in Burscough live elsewhere.

If the intention is to truly develop a comprehensive and successful Local Plan then feedback on Local Planning issues from each of the local populations affected should be listened to, in addition to polling the whole of West Lancashire.