

Local Plan Preferred Options

Feedback Report

May 2012



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Chapter 1 Executive Summary

1.1 This document has been produced to report the results of the consultation on the Local Plan Preferred Options paper, published in January 2012. Consultation was undertaken through a series of forums, exhibitions, surveys, meetings and the invitation to submit written representations.

1.2 1355 written representations were received from 844 respondents, as well as 2 petitions. A further 95 general surveys were completed and many more attended the forums and exhibitions.

1.3 This Feedback Report provides a summary of the views put forward and, alongside the Local Plan evidence base and other consultation exercises, will form part of the evidence for preparing the Publication Local Plan document.

1.4 Analysis of the comments received make it clear that:

- There is general opposition to proposed residential developments, particularly the land allocated at Chequer Lane, Up Holland; Firswood Road, Skelmersdale and Yew Tree Farm, Burscough as well as the Plan B land at Mill Lane, Up Holland.

There is a significant amount of concern in relation to traffic and utility infrastructure (eg drainage) and the ability of the Local Plan to make improvements

There is support for the flexibility of the Local Plan although concerns have been raised in relation to whether developers will just refrain from building on more difficult sites (such as those in Skelmersdale) so that more attractive Plan B sites will be released

The development industry generally object to the housing target (too low) and its distribution around the Borough (too much of a bias in Skelmersdale)

Very few objections were received in relation to all other policies in the document.

Chapter 2 Introduction

2.1 The Government require the Council to involve the community throughout the preparation of the Local Plan, in order to ensure that the community can have their say. The Council has set out how it will do this in the Statement of Community Involvement.

Consultation on the Local Plan Preferred Options

2.2 In January/February 2012, consultation was undertaken on the Local Plan Preferred Options paper through a variety of methods - including written representations, surveys, exhibitions and forums. Events were well publicised through a cover 'wrap' on the Champion newspaper (or a leaflet for all rural homes that do not receive the paper) which was delivered to all households in the Borough. Promotion also involved a press notice, press releases, information on the Council website, Facebook, Twitter, business cards, posters and electronic and postal mail-outs to those registered on the Local Plan consultation database.

2.3 Local Plan officers also met separately with housing developers and local businesses.

2.4 It was important that a wide catchment of opinions and comments were received in order to inform the preparation of the Local Plan and the engagement methods used were designed to maximise interest and involvement.

2.5 The views received through this consultation exercise will be acknowledged, considered and used in the preparation of the next stages of the Local Plan. This report will summarise the representations received, summarise the Council's response to them and detail those actions taken (ie what we have changed in the Local Plan document as a result). Those wishing to view the individual representations received, and the Council's response to them, in full can do so through the Council's website portal. This document cannot report every comment individually, although Appendix A provides the summary of each representation and the Council's response to each representation.

Points to note

2.6 A criticism directed at the Council throughout this consultation was a failure by the Council to listen to objections. The Council can assure people that their views are listened to, but the comments of one area have to be balanced with the comments from the rest of the Borough and other respondents, as well as planning guidance and gathered evidence, to make decisions on the most appropriate site locations and uses. Decisions on planning policies cannot be made on popularity (or lack of it) but have to be based on planning grounds. Therefore, it is not appropriate to say that 'this option received the most votes against and



The engagement methods used were designed to maximise interest and involvement.

Chapter 2 Introduction

should therefore be discounted'. It is not the quantity of the comments received, but the validity and quality of the planning arguments contained within them that is important. For example, concerns about property devaluation or loss of a private view cannot be taken into account as they are not considerations for planning.

2.7 The Council consults with a wide variety of individuals and groups, and anyone is able to make representations on the Plan, and all representations need to be considered. The views of the development industry need to be taken into account, as they are instrumental in delivering the housing that is required. For example, during the last consultation, they expressed concern that delivery of 200 dwellings per annum in a challenging housing market area like Skelmersdale would be extremely difficult, and could be found unsound by a Government Inspector. Likewise, the views of local people and environmental groups are also important and taken into consideration.



2.8 Finally, it should be remembered that, whilst all the events showed a very positive response to the consultation exercise, it is still acknowledged that those who attended represented views from a small cross section of West Lancashire's community. Hence, it is important for the Council to take a balanced view based on all representations and all available evidence.

Exhibitions

2.9 A series of exhibitions were held in different locations of the Borough to illustrate and explain the Preferred Options and answer any questions from members of the public. Exhibitions were held at weekends and in evenings and proved to be popular and well attended. Exhibitions were held at:

- Booths supermarket, Hesketh Bank - Wednesday 11th January 2012 (2-7pm)
Burscough Wharf - Saturday 21st January (10am-4pm)
Skelmersdale Concourse - Saturday 28th January (10am-4pm)
Ormskirk Civic Hall - Saturday 4th February (10am-4pm)

Forums

2.10 Five spatial forum events were held across the Borough in order to facilitate discussion and further ascertain local residents' views on the Preferred Options. Over 200 people attended the forums and included a mix of local residents, landowners, businesses, voluntary organisations, community groups, developers and Councillors. Forums were held at:

- Burscough Stanley Club - Tuesday 10th January (7-9pm)
- Tarleton High School - Thursday 19th January (7-9pm)
- Ormskirk Civic Hall - Tuesday 24th January (7-9pm)
- Skelmersdale Ecumenical Centre - Wednesday 25th January (7-9pm)
- Council Offices, Ormskirk (extra date to meet demand) - Friday 3rd February (2-4pm)

2.11 During the consultation, a few individuals expressed concern that they could not get a place on the Burscough forum because the event was at capacity. Capacity at the forums is not based on the capacity of the room but by the numbers of people that can be accommodated in the break-out workshops. Too many in one group and the facilitator would be unable to manage discussions and hear contributing views.

2.12 Of all these individuals the Council were aware of who could not get a place on the Burscough forum, all were offered places at alternative forum events. This included the addition of the extra forum at the Council offices. Furthermore, people were able to submit their comments through a variety of other methods. Forums were not the only way for people to voice their views.

2.13 Of those who registered onto the forums, many did not turn up to the events. Whilst it is recognised that problems in attending cannot always be helped, it does mean that their places could have been filled by others wishing to attend.



2.14 A consistent approach was taken at each Spatial Forum to ensure that those attending were given equal opportunities to put their views forward, and also to ensure that the results from the discussions could easily be correlated. Each forum began with the same presentation, followed by individual workshop groups to discuss the Local Plan, following which attendees responded to an electronic voting exercise on a series of multiple choice questions. Each forum was designed to last 2 hours with the workshop discussions taking up over half of this allocated time.

2.15 It is important to note that the electronic voting was intended to summarise the main consensus of opinion at each of the forums and provide a rough indication of feeling at each forum. It was not intended to be a precise reflection or representation of the views in each area. The only people not allowed to vote were any Councillors in attendance (as they are able to cast their opinion through Council meetings) and any landowners or their representatives that the Council were aware of. Consultation is open to everyone, and just as we allow members of the public to cast their opinion, we also allow representatives of other organisations to do the same.

2.16 All attendees were also asked to submit formal comments through the written representation exercises.

Written Representations

2.17 The Local Plan Preferred Options paper was available to view on the Council's website, in the Council offices and contact centres and in most libraries and post offices across the Borough. 1355 written representations were received, from comments submitted online

through the website portal, via email, letter or form. Responses came from a wide range of sectors including voluntary and community groups and organisations, businesses and residents and members of the public.

Surveys

2.18 A general survey was also produced and available on the Council's website or to collect at the exhibitions, forums, Council offices, public libraries and post offices. It contained 10 multiple choice questions to quickly ascertain general views on locations for Green Belt release and the policies of the Preferred Options paper. 95 surveys were completed and submitted.

Business breakfasts

2.19 A business breakfast meeting was held at the Council offices, Ormskirk to enable local businesses and employers to find out more about the Local Plan and how it may affect them in the future.

Housing developer forum

2.20 Representatives from housing developers were once again invited to attend a forum at the Council offices, Ormskirk to specifically discuss the Preferred Options and policies in relation to housing. The event lasted two hours and was formed of a series of question and answer led discussions.

2.21 The results of all the events are discussed over the following chapters.

2.1 National Planning Policy Framework

2.22 The National Planning Policy Framework (NPPF) came into effect in March 2012. This Feedback Report also details a number of changes required to the Local Plan as a result of the introduction of the NPPF.

Chapter 3 Written Representations on the Local Plan Preferred Options

3.1 This chapter summarises the written representations received through the consultation, and summarises the council's response to the comments, including highlighting those changes made to the Local Plan as a result.

3.1 Chapter 1: Introduction

Chapter 1: Introduction

Numbers of responses received

Objections	Support	Support with conditions	Observations	Other	Total
6	4	0	15	3	28

What you said

3.2 Many of the comments in this section repeat those received against the individual policies, and so will be detailed as this section progresses.

3.3 There was a criticism that larger proposal maps should have been supplied in this document as the individual plans are too small in scale and provide no details of the rural areas. There was a further criticism that the website does not display all evidence and informing documents in one page to enable easy identification.

3.4 Views were also expressed that the Local Plan should be amended to incorporate the recommendations of the Habitats Regulation Assessment in the policy wording.

3.5 There were further concerns over consultation methods.

3.6 Support was received in relation to policy on minerals and waste developments.

Council response

3.7 Larger proposal maps will be prepared, included and made available at later stages of the Local Plan's production. As the plan is currently in draft stages, large proposals maps are too costly and inappropriate to produce.

3.8 Supporting evidence and background documents for the Local Plan are available on the Council's website. However, the preparation of the Local Plan is a complex process and involves many stages and many forms of reports. For this reason, information is displayed in relation to topics and stages, as this is considered to be the most logical presentation method. However, the Council will review its web pages and try to present the studies more clearly.

Chapter 3 Written Representations on the Local Plan Preferred Options

3.9 The technical assessments, including the SA and HRA, run parallel to the preparation of the Local Plan and are updated as each stage progresses. Recommendations of the current assessments will be reflected within the Publication version of the Local Plan .

3.10 The Council's response to criticism over consultation methods can be found in Chapter 2 (Introduction) of this Feedback Report and through the analysis of specific policies as this section continues. Nevertheless, it is felt that the Council have used sufficient methods with which to promote the consultation process.

Recommendations for change as a result of consultation

- Principle added to para 1.3 - Preserving and enhancing the natural and built environment
- HRA recommendations reviewed and will be implemented as the Local Plan is refined.
- Drafting errors / typing errors to be corrected

Recommendations for change as a result of the NPPF / other policies

- None

3.2 Chapter 2: Spatial Portrait

Chapter 2: Spatial Portrait

Objections	Support	Support with conditions	Observations	Total
8	3	5	13	29

What you said

3.11 Again, many of the comments in this section repeat those received against the individual policies, and so will be detailed as this section progresses.

3.12 There was some questioning of figures and/or their use in justifying development. There was also criticism that the portrait of Skelmersdale portrays the town with a negative bias. There were further complaints that Lathom South Parish is not dealt with in its own right and as separate to Skelmersdale.

3.13 Changes made as a result of the last consultation exercise were acknowledged and supported.

3.14 There was a suggestion that environmental issues should feature more prominently, along with transport improvements. There was also a suggestion that 'Housing' should be identified as a specific key issue for the Borough.

Council response

3.15 The figures are used to provide a summary of the Borough's Profile with more detailed analysis and information provided through the supporting evidence papers. The justification of development, including distribution and types of housing, are explained through the Local Plan policies, most notably SP1.

3.16 It is not the Council's intention to portray Skelmersdale negatively but the portrait does have to describe all areas of the Borough using accurate evidence, and unfortunately the data for Skelmersdale does identify a number of issues in the town, such as high deprivation, low value property, poor health and poor education levels. These are issues that the Local Plan seeks to remedy through the regeneration and development of the town.

3.17 Parishes, such as Lathom South, are acknowledged in the spatial portrait as a geographical reference only. Planning is not determined by administrative boundaries but by functional spatial areas. However, the Council will reference South Lathom alongside Lathom and the other Eastern Parishes in the Spatial Portrait.

Recommendations for change as a result of consultation

- Inclusion of Rufford Old Hall in the spatial portrait for Rufford as a heritage asset and tourist attraction
- South Lathom to be included in para 2.41
- Para 2.21 - change 'weakening' (agricultural sector) to 'vulnerable'
- Re-wording of Skelmersdale Town Centre key issue

Recommendations for change as a result of the NPPF / other policies

- None

3.3 Chapter 3:A Vision for West Lancashire 2027

Chapter 3: A Vision for West Lancashire 2027

Objections	Support	Support with conditions	Observations	Total
13	8	8	8	37

What you said

3.18 Once again, many of the comments received against the Vision reiterate comments made against the policies, and so will be discussed as this chapter of the Feedback Report progresses. There were other calls for amendments to wording, clarifications and greater justifications and explanations.

3.19 There was a suggestion that the tourism role in the northern parishes should be acknowledged and promoted in the Vision. A reference to the inclusion of a statement on the development of the green economy and the creation of jobs through renewable energy deployment, as well as the securing of electricity supply was also suggested. There was an objection to Objective 8 and the requirement that all development should be required to use carbon neutral technology as it was considered this could render developments unviable.

3.20 There were further comments about the accuracy of the housing targets, and Objective 5.

Council response

3.21 The Vision provides a summary of how West Lancashire should be in 2027. The Local Plan provides the strategy and policies with which to deliver this Vision.

3.22 Comments on renewable energy were noted, and energy is included in Objective 8. Renewable energy issues, such as viability, are detailed in Policy EN1. Sustainable development is recurrent through all objectives and the Local Plan policies.

3.23 Whilst it is accepted that the RSS requirement currently stands, it is expected that this will soon be revoked. In the light of the most recent information on population, the housing target of 310 dwellings per annum is considered most appropriate for the Borough. The reasoning behind the housing target is set out in the Technical Paper 2: Housing.

Recommendations for change as a result of consultation

- Under Objective 5, housing figure changed from 300 to 310 new homes a year
- Amend wording of Objective 7

Recommendations for change as a result of the NPPF / other policies

- None

3.4 Chapter 4: Strategic Policies

Policy SP1: Sustainable Development

Objections	Support	Support with conditions	Observations	Total
56	11	15	15	97

What you said

3.24 Support was received in relation to the settlement hierarchy and distribution of development. This included focusing the majority of development on Key Service Centres and allocating over half of all proposed new development within Skelmersdale. It was emphasised that development should only be permitted in locations easily accessible to good public transport services. The creation of an Ormskirk bypass was supported.

3.25 There were questions raised as to how the figures for housing had been derived. Some felt the figures were too high and fewer sites are needed, whilst others felt that the housing figures should be increased and more sites identified for housing. There were concerns, mainly by developers, that the numbers of housing allocated to Skelmersdale place an over-reliance on delivery in the town which cannot be achieved. There were also calls, again from developers, that the current housing delivery deficit should not be spread out over the whole plan period as proposed, but rather front-loaded as an urgent objective to recoup the shortfall through the release of sites.

3.26 A few respondents considered that the Local Plan fails to do enough to prioritise housing development on brownfield sites. Other criticisms were received in relation to whether the Local Plan does enough to deliver employment development or plan for infrastructure. It was suggested that the Local Plan should set out realistic delivery targets for development detailing how and when they will be progressed.

3.27 Concerns were raised about the difficulty of delivering housing given the infrastructure constraints in Burscough and Ormskirk and the ongoing weak market problems of Skelmersdale. It was suggested that development in Skelmersdale should be linked with the regeneration and town centre redevelopment timescales. It was also suggested that if the Council were to release safeguarded land now, with a greater certainty of development occurring on those sites, then the housing targets could be more easily met.

3.28 There were some respondents that felt that Ormskirk should still be considered for greater levels of development, as well as the smaller rural settlements such as Halsall and Haskayne. A few felt that the benefits and disadvantages of development in Ormskirk had never been properly set out and fully available for the public to comment on. However,

Chapter 3 Written Representations on the Local Plan Preferred Options

others felt that the rejection of the Ormskirk strategic site was the right decision and enables a fair balance for development across West Lancashire whilst focusing development in the most sustainable areas, prioritising brownfield land development and releasing only the most appropriate Green Belt sites.

3.29 There were concerns that needs of rural communities, such as affordable and elderly accommodation, would not be met under the current proposals. There were also concerns that Burscough is taking the largest amount of Green Belt release and the second highest housing delivery targets, despite it being a lower order settlement than Ormskirk and some representations considering it has the same issues that justified the deletion of Ormskirk as a strategic option for development.

3.30 Criticisms were received that the Local Plan fails to identify Southport as a regional town and, in doing so, fails to illustrate the sustainability of linking areas of West Lancashire to this settlement. It should be noted that this comment was submitted in direct support of development at Fine Janes Farm, Halsall.

3.31 There were requests that the former School site at Hoole Lane, Banks is allocated for development to prevent it from becoming an eyesore within the village. Other sites suggested included sites in Rufford, Banks, Aughton and Appley Bridge.

3.32 Development of Green Belt land was not supported by many respondents because of the loss of agricultural land. It was felt that this land should be protected to secure food production.

3.33 Some felt that there should be a presumption in favour of renewable energy developments, even in the Green Belt, and that they should only be prevented if it can be demonstrated that significant negative factors outweigh that presumption.

3.34 There were some concerns that the Local Plan does not contain contingency plans for the potential of flooding in relation to the Lower Alt. A further request was received for a minor change of wording to flood risk.

3.35 The Coal Authority submitted a request for the Council to ensure mineral reserves are protected and issues as a result of Skelmersdale's mining legacy considered.

3.36 There were several objections concerning the whole document that Lathom South was not being considered as an independent settlement.

Council response

3.37 The Local Plan needs to be compliant and consistent with national planning policy in order to be found "sound". Therefore, the Local Plan needs to ensure it delivers sufficient housing to be considered consistent with national planning policy and household projections.

3.38 The housing target is based on the latest evidence in the CLG Household Projections and is a minimum target. Figures on housing are explained in more detail in the supporting Housing Technical Paper whilst Infrastructure Delivery is discussed in the Infrastructure Delivery Plan.

3.39 The Council reviewed the proportion of housing that could be delivered in Skelmersdale following comments made at the last stage of consultation. As a result, it was decided that the Skelmersdale targets were too high to be deliverable and figures in the town were reduced, with the resultant effect of needing to place those residential units in other areas of the Borough.

3.40 The Council are confident that new targets in locations such as Skelmersdale with Up Holland and on the larger strategic sites can be delivered in a timely manner over the Local Plan period and have based this on historic delivery rates and anticipated site-based annual delivery rates in different locations across the Borough. With regard to the emerging National Planning Policy Framework, the 20% extra applies only to the 5-year housing land supply, and latest guidance from CLG has made it explicitly clear that this 20% does not apply to the full 15-year target, nor should it mean that said target should increase.

3.41 The Local Plan Preferred Options proposes a distinction between its preferred development strategy / allocations and its "Plan B" to limit the amount of Green Belt land to be developed and encourage the development of brownfield sites in the urban areas and existing villages. If there was no distinction between the preferred strategy and "Plan B", more Green Belt land would be lost to development than may be needed to satisfy local housing targets, possibly instead of brownfield sites in urban areas.

3.42 The Local Plan does include all brownfield sites within existing towns and villages, but even taking these into account, a small amount of Green Belt is still required to meet the housing targets for the Local Plan period. In arriving at the preferred strategy, the desire to minimise release of Green Belt was a key consideration, but it was not the only consideration. Sustainability, infrastructure provision and the environment were key factors, as was preserving and enhancing the Borough's rural character wherever possible. Therefore, the preferred strategy does maximise opportunities to use non-Green Belt land first, but only where good planning in terms of sustainability, infrastructure, the environment and maintaining the character of the Borough allow.

3.43 The land to be released from Green Belt is less than 1% of the Borough's total and the remainder will remain protected from development for the Local Plan period. Over 90% of the Borough will remain Green Belt and agricultural land - the highest proportion in the country.

3.44 SP1 does not prioritise brownfield land because it is not necessary, as all brownfield land will be required to deliver the Local Plan.

3.45 The Local Plan Preferred Options would see 86% of residential development located in the three Key Service Centres of the Borough. This is considered appropriate and sustainable given that it locates new housing nearer to key services. The size of an existing settlement cannot be the main determining factor in where development should go. While Ormskirk is a sustainable settlement and a Key Service Centre, so is Burscough. Both Ormskirk and Burscough are sustainable settlements and Key Service Centres, although both are affected by infrastructure constraints (waste water treatment and, especially Ormskirk, traffic issues). Given that both Burscough and Ormskirk are sustainable locations for new development, the selection of sites for Green Belt release was determined on site-specific assessments, including the results of the Sustainability Appraisal.

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3.46 The Local Plan has been prepared with full knowledge that Southport (along with other parts of Sefton) is a significant provider of services for the western parts of West Lancashire. However, despite their proximity to Southport, the western parishes are still rural in nature and so development must be carefully planned and limited to protect the rural character of the area. The Local Plan does enable development within existing villages (including Halsall and Haskayne) but does restrict development in the least sustainable villages. Expansion of these areas is resisted to retain the rural character of those villages and ensure Green Belt is lost only in the most sustainable locations. Policies EC1-3 do encourage employment developments in rural areas.

3.47 It is recognised that there are potential benefits of the development of other sites, such as Station Road in Banks and Parrs Lane, Aughton. However, these are not considered to be as sustainable as other sites, due to issues including services, infrastructure, the availability of other more suitable sites and the protection of Green Belt. Some sites, such as the former school site in Hoole Lane, Banks, are within the existing village boundary and therefore redevelopment of the sites would be permissible in principle.

3.48 Lathom South Parish is not a settlement, but an administrative area. Settlements listed in the Table in SP1 were limited to those not washed over by the Green Belt. The only area of land not washed over by the Green Belt in Lathom and Lathom South is the land directly adjacent to the western edge of Skelmersdale bounded by Spa Lane, Firswood Road and Ormskirk Road (A577), including those properties on the south side of Ormskirk Road. This land is contiguous with the Skelmersdale urban area and includes XL Business Park (a functioning part of the wider Stanley Industrial Estate in Skelmersdale), the land proposed to be allocated between Firswood Road and Neverstitch Road for housing (and which may well have its primary access onto Neverstitch Road in Skelmersdale) and the existing residential properties on Ormskirk Road and Firswood Road. Therefore, while virtually all this land may, administratively, be within Lathom South, functionally and spatially it is a part of the Skelmersdale urban area and not an independent settlement.

3.49 The Council recognise that, ideally, the start date of the Local Plan should coincide with the adoption of the document. However, due to a slippage in timescales for preparation due to the need to reconsult on strategic changes to the proposed policies this will not happen for the Local Plan DPD. To alter the Plan period (and so add to the housing and employment land targets and therefore increase the release of Green Belt for new development) would constitute yet another strategic change, resulting in an other delay to the preparation of the Local Plan DPD. It is anticipated that housing delivery will remain slow over the early part of the Local Plan and gradually rise over the Plan period. Therefore, the Council proposes a lower annual target initially that then rises to an above average annual target in the latter part of the Plan period. This gradual rise in housing targets also allows for the time needed to rectify the key infrastructure issues in the Borough, such as the waste water treatment issue which precludes development on large greenfield sites in the Ormskirk and Burscough areas.

Recommendations for change as a result of consultation

- Policy SP1 to be simplified. Much of latter part removed to avoid duplication with later policies or moved to Policy GN3.
- Re-label Ormskirk with Aughton and Burscough as 'Key Service Centres' only within the settlement hierarchy

Recommendations for change as a result of the NPPF / other policies

- 'Model' policy wording on NPPF and Presumption in favour of sustainable development inserted

Policy SP2: Skelmersdale

Objections	Support	Support with conditions	Observations	Total
10	7	1	8	26

What you said

3.50 The majority of comments received were in support of the regeneration of Skelmersdale town centre, particularly to accommodate new retail, office, leisure uses and a night-time economy as well as affordable housing.

3.51 However, there were calls that the viability of the Concourse should be protected amidst the plans for the town centre development through appropriate integration. There were also calls that the civic buildings (library, pool, police station) should be appropriately located so as to integrate with the town centre and its functions.

3.52 It was highlighted that consideration needs to be given to promoting sustainable travel methods such as walking and cycling in Skelmersdale given the current design of the roads. This could include improving the underpasses. Rail links, a rail station and improvements to bus services were also supported.

3.53 Representations with regard to the proposed new supermarket were mixed, with some respondents stating that it should be resisted as out of town retail, while others supported a new supermarket.

3.54 It was recommended that the Tawd Valley should be incorporated into the layout of new residential developments as a feature. Town centre development should also be connected to a strategic green infrastructure and residential areas.

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3.55 It was reiterated that the Council should carefully consider reliance on Skelmersdale to deliver its housing targets due to the weak housing market in the town. Some representations felt that the figure of 10% affordable housing seems particularly low whilst other representations supported it.

3.56 There were some suggestions for the re-wording of the policy to support the redevelopment proposals and remove the prescription of floorspace targets.

Council response

3.57 The Council support the provision of cycling and walking facilities in Skelmersdale and they are a priority within the Local Plan and Local Transport Plan 3 (LCC). The Council also supports the delivery of a rail link into Skelmersdale and is assisting the responsible authorities with their investigations into the feasibility and delivery of such a scheme.

3.58 The Council's retail studies indicate that there is capacity for an additional food store in Skelmersdale but Policy SP2 clearly states it should be integrated with the town centre proposals as part of an integrated regeneration scheme.

3.59 To ensure Policy SP2 remains flexible, the Council will remove specific retail floorspace figures and the justification will require proposals to accord with the latest available evidence.



3.60 As a result of comments made in the last consultation (2011), the target for Skelmersdale was reviewed and reduced by 20% from 200 dwellings a year to 160 dwellings. Whilst the Council recognises that this is still a relatively high figure in terms

of past delivery rates, the Council are confident that the quality of the housing land supply, coupled with the town centre improvements, will assist in achieving this target.

3.61 The Council recognises the need for affordable housing, and an increased housing offer in general, and has therefore designated land around the town centre area positioned close to existing residential areas where there is the potential to develop links through these currently open areas into the town centre.

Recommendations for change as a result of consultation

- Remove reference in SP2 (2.i) to quantity of floorspace and reword justification to require proposals to accord with the latest available evidence
- Remove reference in SP2 (2.i) to a new high street
- Amend figure 4.2 to remove retail figures
- Add reference to latest Retail Study Update evidence, including indicative floorspace, to justification

Recommendations for change as a result of the NPPF / other policies

- None

Policy SP3: Yew Tree Farm, Burscough

Objections	Support	Support with conditions	Observations	Total
473	12	2	6	493

Of those 473 objections, 376 were the same standard letters from a template, individually signed by Burscough residents. In addition, a 1643 signature petition was received, which has been previously considered by the Council.

What you said

3.62 Of the objections there were many points raised and criticisms directed at the Council, including the following:

- Loss of Green Belt
- Loss of agricultural land
- Loss of farming jobs
- Loss of open views
- Loss of wildlife, trees and hedgerows
- Loss of village character
- Loss of private view
- Devaluation of property
- Scale of development
- Loss of safety buffer between residential and employment uses.

- Health implications (such as cancer and industrial accidents) caused by development being built too close to the employment area
Flooding and poor drainage problems, which will be exacerbated by the addition of more impermeable surfaces by the development
The need for infrastructure improvements
Utility improvements in relation to waste water should be provided by the Council irrespective of development
Congestion and traffic problems which would be exacerbated by the development
Traffic problems degrading the quality of Burscough town centre commerce and the usability of the industrial estate
Increased pollution
Insufficient car parking in the retail centre of Burscough
Impacts of traffic from Burscough on Newburgh (A5209)
Failure to create a bypass to deal with the traffic
GPs, schools, policing and other services will be unable to cope with increased numbers
Burscough is a rural area and should not have development
Failure to use all available brownfield sites in West Lancashire first
Infill development according to need would be more suitable
The availability of alternative options (such as an Ormskirk strategic site)
Vacant properties should be taken into account and deducted from the housing targets
Unsustainable development
Lack of confidence in the actual delivery of new services and improvements
Object to the provision of affordable / council houses

3.63 Some raised objections that they did not think the consultation was carried out in a fair way. They felt that the previous objections from Burscough residents had been ignored, particularly given the feedback illustrated that the Burscough option had the highest number of objections received out of all the options initially put forward. There were also complaints that the Council are listening to the views of people outside of Burscough to gain support for Yew Tree Farm development.

3.64 Some support was also received for the proposals. It was acknowledged that the proposals would deliver new residential, employment, economic and community benefits to Burscough. This would include new amenities, a school and a park. Many recognised that new housing is needed, including affordable and specialised housing as well as market housing, and that Burscough is an appropriate and sustainable location. Proposed housing will be close to the local centre, and to the industrial estate, making it easy to access retail, services, transport and employment. There was a further suggestion to build houses near Higgins Lane to help regenerate the southern part of Burscough.

3.65 Furthermore, whilst the need to resolve problems with infrastructure are essential before any development can commence, it was recognised that this is specified within Policy SP3. Any development will therefore only serve to improve the infrastructure in the area which can only be a further advantage. Without this strategic site, no improvements could be made and the problems could potentially continue to increase.

3.66 It was felt that businesses and employment would be attracted to the area and the local economy would be improved as a result of increased commerce and expenditure in the local businesses. Some pointed out that Burscough is a key service centre, and supports other local and more rural areas with fewer services available to them rather than just Burscough itself.

3.67 Some stated that Burscough traffic, by comparison, is less problematic than other areas such as Ormskirk. Indeed, traffic in Ormskirk is often exacerbated by people travelling to Southport causing gridlock through the town. Some raised concerns that if development cannot be placed by a major road (A59) then that should limit the suitability of other areas that are not within easy access of a main road. Much of the support recognised that the traffic and transport issues could be addressed prior to, or through, the development taking place.

3.68 It was highlighted that the land identified for release is surrounded by development on three sides, does not fulfil the current purposes of Green Belt and is of lower grade agricultural land than other sites considered. Subsequently, some respondents deemed it to be of lesser importance to the Borough. It was considered that releasing Green Belt land elsewhere in Burscough would extend development into the open countryside. It was stated that the current proposals will provide the opportunity to infill the current settlement layout, linking the straggle of ribbon development at the south of the Burscough into a coherent whole. Some felt that those options presented in earlier stages of the Local Plan (Dispersal and Ormskirk), would not provide the benefits of the scale of services, infrastructure and development opportunities as those proposed for Burscough through this Plan.

3.69 There was confirmation by the landowners that the land is available for delivery and that they support the creation of a decentralised energy network.

Council response

3.70 Firstly, in response to the criticism directed at the Council in relation to consultation and ignoring representations and public opinion, the Council can assure all concerned that all views are listened to, but the comments of one group have to be balanced with the comments from other respondents, as well as planning guidance and gathered evidence, to make decisions on the most appropriate site locations and uses. Decisions on planning policies cannot be made on popularity (or lack of it) but have to be based on valid and sound planning grounds. Therefore, it is not enough to say that 'this option received the most votes against and should therefore be discounted'. Nor can comments about property devaluation or loss of a private view be considered.

3.71 In relation to the planning grounds raised, the Council can respond as follows:

3.72 Existing homes in the Borough cannot count towards the housing targets in the Local Plan. A 3% vacancy rate is typical in any housing market and is required to ensure a necessary level of 'churn' in the market. Indeed, West Lancashire's level is lower than the national average of 5%.

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3.73 All brownfield sites in West Lancashire have been identified and assessed for the suitability of their development. The vast majority will be used for development and have been included in the calculations of land requirements, however, there is still an insufficient supply with which to meet need. Subsequently, Green Belt release has had to be considered.

3.74 The release of Green Belt for development is a last resort for the Council to meet housing and employment needs over the next 15 years. The total area proposed for release is only 0.4% of the Borough's total Green Belt land. This small quantity of land, not all used for agriculture, represents a small proportion of agricultural land and will have little effect on the agricultural economy in the Borough.

3.75 Spreading Green Belt release through smaller sites was considered early in the preparation of the Local Plan but was rejected because it would impact on more areas of Green Belt (many of which actually fulfil the purposes of Green Belt), it would spread the impact on infrastructure around the Borough without being able to address any resolutions, and would reduce the levels of viability in delivering affordable homes.

3.76 The Yew Tree Farm site is bounded by existing development on three and a half sides, with only small gaps along the built boundary lines. The Green Belt study found this site no longer fulfils any of the purposes of the Green Belt and therefore should no longer be designated as Green Belt, making it suitable for release. The agricultural land quality of the Yew Tree Farm site was assessed by professional consultants and was only one factor used in assessing the potential sites for Green Belt release. In comparison to the other sites assessed, the Yew Tree Farm site generally did not have as high quality agricultural land.

3.77 The amount of housing proposed forms part of a borough-wide target for housing which is needed to meet the projected growth of the West Lancashire population. The role of the Local Plan is to direct development proportionally to areas and settlements within the Borough based on infrastructure and environmental capacity to ensure the development is delivered as sustainably as possible.

3.78 Skelmersdale is accommodating over half the new housing in the Borough over the 15 year period. The market cannot deliver any greater than this in any one area and the needs of the entire Borough must be met by spreading the development across other main settlements. Ormskirk suffers from similar infrastructure constraints to Burscough however its levels of traffic congestion are far greater and it has more limited scope for improvements to remedy its problems.

3.79 Burscough is the third largest settlement in the Borough and is considered a Key Service Centre that residents from a wide surrounding area use for services and amenities and is a far more sustainable settlement than the next largest settlement in the Borough (Tarleton) with comparably better infrastructure than the rural areas of the Borough. The settlement is allocated 18% of the overall development needs of West Lancashire, and the Council considers this to be appropriate. The housing figure for the Yew Tree Farm site has been reduced from 600 dwellings to 500 to account for feedback received in the last consultation exercise (2011) regarding delivery within the plan period.

3.80 Whilst it is understandable that residents do not wish to see the local area change, planning for large scale development through the Local Plan process is considered to be appropriate to the Burscough settlement, the wider Borough and in tune with the guidance

of the NPPF (para 52). The Yew Tree Farm development site is located between existing developed areas which reduce the likely impact development would have on the rural nature of the Borough, and in particular the impact the development would have if it was located in proximity to some of the smaller villages that do not have the scale of urban area or local services that Burscough has.

3.81 The Council understands the concerns that residents have in terms of the need for detail within these proposals, however as the Local Plan process requires a variety of options to be considered, it would not be practical to establish the finer details regarding all of the possible proposals for future development. However, the proposals presented within the Local Plan Preferred Options have all been assessed to some degree and evidence confirms they are all fundamentally deliverable. Details will be produced through the later masterplanning stages, in consultation with the local community.

3.82 The Local Plan allows for masterplanning principles, such as the need for community facilities within large scale developments, to be engrained within the Plan and subsequently enables a firm requirement of development assessed against the Plan.

3.83 Any development would be required to meet standard planning and building regulations in relation to a buffer zone between employment and residential uses. The current buffer is far larger than is required to maintain safety.

3.84 The resolution of waste water treatment infrastructure requires partnership working between the Council and United Utilities (UU). It is UU that have the duty to upgrade and improve the waste water treatment network. Whilst the Council understands residents feel these improvements should be made regardless of new development, both UU and the Environment Agency confirm the treatment works is currently operating to an acceptable standard. The Council are working with both UU and the Environment Agency to support and deliver improvements that will facilitate future growth and development. It is anticipated that these will not be delivered prior to 2020, and the policy clearly specifies that no development will be allowed until these issues have been resolved.

3.85 The responsibility for the resolution of surface water flooding lies with UU and landowners. New development provides a potential opportunity to address some of these issues through engineering works on the development site. Again, these improvements must be made before any development is delivered, and they may benefit the wider town.

3.86 In relation to traffic, the Council (with Lancashire County Council) have undertaken analysis of the potential increase in traffic in Burscough and all other proposed new development areas. While new development in Burscough will add more vehicles to the road network, it is considered that the capacity of the road network, in conjunction with improvement to junctions and traffic management, can adequately support the increased number of vehicles

3.87 The Council are working closely with transport providers to encourage improvements to rail and bus services. However, as the responsibility for implementing public transport or highways improvements does not lie with the Council, all the Local Plan can do is support proposals the Council believe would be beneficial and cost-effective and encourage those organisations responsible to deliver improvements.

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3.88 Detailed junction improvements directly associated with the site would be assessed and identified through the master-planning exercise for the site in the future, in close consultation with the local community. A new bypass would not be cost-effective or necessary and is highly unlikely to come forward.

3.89 Partnership working has been undertaken with the local health service (Lancashire Primary Care Trust) and education authorities. They state that schools and health services can cope with current levels, but if extra capacity was needed as a result of development, these services would be provided. However, there would be no need to deliver an additional secondary school in Burscough, or indeed the Borough, based on forecasts.

3.90 The Habitat Regulation Assessment, undertaken independently by planning consultants, found that the Local Plan did not have any negative effects on international sites of nature importance (such as Martin Mere) that could not be mitigated for. To the best of the Council's knowledge, the Yew Tree Farm site does not hold any significant habitat or wildlife value. However, if protected species and their habitats were identified on the site, these would need to be accommodated before development took place. Where appropriate, all development will be subject to full ecological assessment and must mitigate against any possible impacts on wildlife.

Recommendations for change as a result of consultation

- Amendment to SP3 to include reference for development to consider impact on heritage assets and implement appropriate mitigation measures

Recommendations for change as a result of the NPPF / other policies

- None

3.5 Chapter 5: General Development Policies

Policy GN1: Settlement boundaries

Objections	Support	Support with conditions	Observations	Total
13	7	1	3	24

What you said

3.91 Some suggested that settlement boundaries for the more rural settlements should be given further consideration to ensure enough development can be provided for in the smaller settlements during the Plan period. Others raised objections that rural areas (Firwood Road area, South Lathom) are being considered within the boundaries of urban areas (Skelmersdale).

3.92 Many recognised that the proposed changes to the boundaries were significant enough to enable development but minimal enough to protect agricultural land, Green Belt and the character of heritage assets. There were calls for slight amendments to boundaries, to include areas that are built up or to justify the availability of a site for development. By contrast, there were calls for allocated sites, or Plan B sites, to be removed from the boundaries so they remain designated as Green Belt.

3.93 There were questions raised over small scale affordable housing sites and their viability as it was felt that 100% affordable housing sites are not always a feasible option and rarely delivered.

Council response

3.94 It is considered that the proposed settlement boundaries allow for sufficient development over the Plan period. The Green Belt Study and the Strategic Options and Green Belt Release Technical Paper set out the reasoning for the selection of sites. Given the lack of key local services in the villages (or access to them), it is not considered sustainable to release Green Belt on the edge of these areas.

3.95 In relation to land at Firwood Road, while this land may, administratively, be within Lathom South Parish, functionally and spatially it is a part of the Skelmersdale urban area and not an independent settlement. The land at Firwood Road is contiguous with the Skelmersdale urban area and includes XL Business Park and residential properties. The land is also currently safeguarded under WLRLP Policy DS3. Given development requirements and housing land supply, taking into account brownfield sites, and sites within the Borough's urban areas, the land at Firwood Road is needed to help meet the development requirements for the new Plan period 2012-2027.

3.96 Land designated under WLRLP Policy DS4 (Protected Land) was considered as one of the sources of land supply to meet development targets. One area of DS4 land at Chequer Lane has been allocated as a housing site. However, much of the DS4 land in other areas is subject to constraints (e.g. wastewater, drainage, flood risk, highways) and such locations were not judged appropriate for allocating new development. Therefore, it has been considered preferable to exclude much of the DS4 land from settlements and to meet development needs on safeguarded land, and, exceptionally, on a number of Green Belt sites.

Recommendations for change as a result of consultation

- Justification amended to cover the setting of heritage assets and settlement appearance

Recommendations for change as a result of the NPPF / other policies

- None

Policy GN2: Safeguarded land

Objections	Support	Support with conditions	Observations	Total
190	2	3	2	197

A petition of 277 signatures was also received in opposition to land at Mill Lane, Up Holland. The majority of objections related to Mill Lane, Up Holland.

What you said

3.97 The majority of objections concerned the removal of land from the Green Belt.

3.98 Objections to development at Mill Lane included:

- Over-development in Up Holland
- Loss of village character
- Loss of Green Belt
- Loss of a play area
- Loss of wildlife on site
- Insufficient infrastructure, including parking in the village, schools and GPs
- Traffic safety, traffic speeds, poor access and dangerous road
- Loss of private views
- Devaluation of property
- Sewage implications
- Council have failed to consider brownfield sites
- Development of Mill Lane could mean continual housing to St Josephs College
- Empty homes not deducted from housing targets
- Lots of local homes up for sale suggest there is no demand
- Skelmersdale should accommodate the housing, not Up Holland
- Why is Up Holland being considered with Skelmersdale anyway?
- Previous planning application on the site for housing have been refused on traffic grounds
- Complaints about publicity

3.99 There were a few concerns raised in relation to other 'Plan B' sites, including those on the boundary of Sefton. It was requested that the allotments on the Moss Road site should be protected, including a representation from Sefton MBC.

3.100 Some landowners worked to promote their own sites and suggested that additional sites should be identified as safeguarded land for development, including land at Halsall and Haskayne. Others suggested land allocated through GN2 as safeguarded should be allocated for housing now, rather than wait for a Plan B to kick start. This included land at Parrs Lane, Aughton.

Council response

3.101 The Council endeavour to publicise consultation on planning documents. Whilst it is has been drawn to our attention that the Champion paper has an incomplete circulation in Up Holland (eg Tontine), and we will try to address this problem in future exercises, it was not the only method used to notify. Information was available through posters and information packs left in libraries and post offices, as well as through press notices, press releases, forums, exhibitions, Facebook and the Council website. In addition Council officers were always available to contact by phone, email or by visiting the council offices. It is not the Council's policy to write to individual properties to notify them of a Borough-wide consultation.

3.102 Technical Paper 1 sets out the approach undertaken in identifying Plan B sites, and balancing the need to deliver sites in sustainable locations with the need to protect Green Belt land that actually fulfils the purposes of Green Belt.

3.103 A small proportion of Green Belt land is required for development or the Plan B in the Local Plan to meet housing and employment needs over the 15 year plan period, and to ensure flexibility in housing land supply. This is in line with the latest Government guidance, and requirements, on planning for housing. The Mill Lane site has been identified as one of the more suitable sites for release from the Green Belt and, should it be required, would not place undue stress on local infrastructure and services. It is only 200m from the village centre and a quality bus route and is not affected by strategic environmental constraints.

3.104 Highways access to the Mill Lane site could be designed so it makes Mill Lane safer for pedestrians and vehicular traffic. Given the site is only 200m from the village centre, there should be no need for residents to drive to the local centre and therefore no need for parking. Up Holland Parish Council pointed out that they hold a lease over part of the site which would prevent those areas of the site from being used for access or development. These issues would therefore need to be resolved if development was to take place on the site. Should development be required at Mill Lane, it would not affect the vast majority of the open space at Mill Lane. If highways access to the north-west corner of the recreation site was to be required, the play area would be replaced elsewhere in the open space. Furthermore, any new development would be required to be of appropriate design, so it does not impact unduly on the amenity of neighbouring properties and uses. Any safety issues potentially raised by construction would be dealt with through conditions on any planning permission should the site come forward.

3.105 A previous planning application (at 26 Mill Lane) was refused in 2006 because the building by reason of their scale, orientation and design would be an incongruous development within the street scene, and not because of concerns over traffic congestion or safety.

3.106 It is the Council's understanding that the planning permission granted on appeal for development at St Josephs College is no longer viable or deliverable and is not anticipated to be implemented during the Local Plan period.

3.107 Up Holland is only included with Skelmersdale because, spatially, they are one contiguous urban area. This does not preclude the fact that, administratively, they are two separate settlements. All available and suitable sites within Skelmersdale have been accounted for in terms of their contribution towards development targets. Skelmersdale is already accommodating over half of the proposed new dwellings over the Local Plan period and the market could not deliver more than that over the period.

3.108 Councils cannot count empty properties or properties for sale towards the delivery of housing market at any given time. Indeed, the proportion of homes that are vacant in West Lancashire is lower than the national average. These properties are already part of a housing market and it is normal to have a certain amount of properties empty or for sale to enable 'churn' in the market.

3.109 In relation to other Plan B sites, the Council's reasons for selecting them are set out in the Strategic Options and Green Belt Release Technical Paper, and these reasons still stand. In terms of concerns expressed at these sites, the vast majority of land in the Borough is agricultural land, or has value for wildlife habitat, or fulfils at least one purpose of the Green Belt. Therefore, whilst these factors were considered, virtually all sites assessed were affected by at best one of these issues and land is required somewhere in the Borough to meet development targets. Therefore, the Council have chosen those sites most appropriate, most sustainable and most deliverable.

3.110 Loss of private views and devaluation of property are not valid considerations for planning refusal.

3.111 Those sites proposed as alternative Plan B sites, located in the Western Parishes, are not considered sustainable for release from the Green Belt due to the lack of key local services in the villages, or access to them, and the fact they are less sustainable sites than those already included in Plan B. Similarly, those sites proposed in Banks and Parbold are also deemed to be unsustainable, with issues including infrastructure constraints, lack of access to local services and flooding risk.

3.112 It is acknowledged that allotments should be safeguarded from development and they will be designated as an open space and thereby protected from development.

Recommendations for change as a result of consultation

- The allotments at the Moss Road site will be safeguarded from development and designated as open space in Policy EN3.
- Errors corrected in labels of GN2 sites on proposals maps.

Recommendations for change as a result of the NPPF / other policies

- None

Policy GN3: Design of development

Objections	Support	Support with conditions	Observations	Total
2	2	4	2	10

What you said

3.113 It was suggested that the Policy GN3 should include a specific section on the design considerations required when developing in historic places and in protecting heritage assets. There were some requests for drainage areas to be referred to in the policy as well as suggestions that the policy should be amended to make it less onerous and more robust. It was also suggested that design expectations should, in some circumstances, be more flexible to support viability of developments, for example the use of cheaper materials.

3.114 There were calls for the Design Guide SPD to be revised.

Council response

3.115 Comments regarding critical drainage areas and buffer zones have been noted.

3.116 Further statements in GN3 in relation to heritage are not required as this would lead to duplication and cross-over with other policies, such as EN4.

Recommendations for change as a result of consultation

- Justification to include clarification of the location of critical drainage areas
- Inclusion of wording at criterion 5(v) relating to environmental buffers between development and environmental / landscape features
- Re-wording of policy to ensure no duplication with other Local Plan policies and to ensure inclusion of the protection and improvements to water quality and the remediation and restoration of contaminated land and any other matters removed from Policy SP1, as a result of other recommendations on that policy.

Recommendations for change as a result of the NPPF / other policies

- None

Policy GN4: Demonstrating viability

Objections	Support	Support with conditions	Observations	Total
4	0	1	0	5

What you said

3.117 There were some criticisms that the policy should not require applicants to prove viability to justify a change of use for agricultural buildings as this is not consistent with the NPPF. It was suggested that demonstrating viability is onerous and does not encourage flexibility in the planning process.

3.118 Others welcomed the introduction of using a viability statement to demonstrate alternative uses and felt it acceptable to enable unused agricultural buildings to be converted to residential use.

3.119 Some comments suggested that the demonstration of viability could extend further, to show how development can be used to make what would otherwise be an unviable scheme / proposal viable, such as cross-subsidisation of schemes or securing the reuse of an important heritage asset.

Council response

3.120 In conjunction with Policy IF1, Policy GN4 provides an important check on the loss of uses that are important to the local community or the economic base. The NPPF includes a presumption in favour of sustainable development. Policy GN4 provides an important mechanism for retaining vital and viable town centres and promoting thriving, inclusive and locally distinctive rural economies. It will allow applicants to demonstrate why their proposed development passes the tests associated with the presumption in favour of sustainable development in paragraph 14 of the the NPPF.

3.121 The Local Plan does make allowance for general development viability and the role of enabling development, especially exemplified by Policy EC3 which allocates 4 employment / brownfield sites in rural areas that would struggle to deliver a viable proposal for employment development alone for mixed-use redevelopment. Policy GN4 is aimed at ensuring that uses that are viable are maintained where they are of most use, for example, retail in town centres, business units on key employment sites, agricultural workers' dwellings close to active farms. This is consistent with the NPPF.

Recommendations for change as a result of consultation

- No change required

Recommendations for change as a result of the NPPF / other policies

- None

Policy GN5: Sequential tests

Objections	Support	Support with conditions	Observations	Total
5	0	0	0	5

What you said

3.122 Some felt that the sequential approach should be applied in the allocation and choice of Green Belt releases and housing allocations.

3.123 It was suggested that the Chequer Lane development should be subject to rigorous sequential testing and not take place before development in Skelmersdale town centre has been secured and undertaken.

3.124 There was a recommendation that Policy GN5 should be amended to require developments in Flood Zone 2 and 3 to satisfy a sequential test. However, others suggested that Policy GN5 is not required as it replicates national planning policy. It was stated that policies such as this are only necessary if it is considered that a local interpretation of national policy is required and sound evidence justifying it can be provided.

Council response

3.125 The methodology for selecting the proposed major sites for Green Belt release and housing allocations was broader than a sequential test. Full details are set out in the Green Belt study and the Green Belt and Strategic Options Technical Paper.

3.126 A sequential process of sorts has been used in selecting proposed housing sites, with Skelmersdale Town Centre and other sites within Skelmersdale allocated for housing as the priority. Only after these sites were counted against the housing land supply for 2012-2027 did the Council look at other sites, including Chequer Lane. In order to maintain a rolling five year supply of deliverable housing land, some sites in the Skelmersdale / Up Holland area may need to be developed before, or at the same time, as the town centre.

3.127 It is considered that Policy GN5 does provide a local interpretation of, and add value to, national policy, for example by clarifying the area of search for sites. It also applies to categories of development not covered by national policy.

Recommendations for change as a result of consultation

- Additional types of development listed for accommodation for temporary agricultural / horticultural workers. Link to a brand new policy on this - Policy RS5
- Flood Risk Sequential Test also included

Recommendations for change as a result of the NPPF / other policies

- None

3.6 Chapter 6: Facilitating Economic Growth

Policy EC1: The economy and employment land

Objections	Support	Support with conditions	Observations	Total
4	6	1	3	14

What you said

3.128 Support was received for the development of existing employment land allocations and remodelling industrial estates in Burscough and Simonswood. It was emphasised that relevant public transport for workers to employment locations needs to be provided. It was also reminded that development should not cause unacceptable adverse environmental impacts. National Grid stated their preference that employment buildings are not built directly beneath its overhead powerlines in Simonswood.

3.129 An objection was raised by a landowner because the Council have failed to consider Green Belt release in the area around White Moss Business Park to provide a supply of employment land. A suggestion was also made that the restriction of B1 use class only at White Moss Business Park should be removed.

3.130 Support was received in relation to increasing the employment opportunities available in the Borough. It was suggested that employment should be skilled rather than low cost warehousing to create a greater number of skilled jobs.

Council response

3.131 Comments have been noted. The Local Plan supports mixed use development and, with Policy IF2, seeks to support and enhance transportation links to employment sites.

3.132 White Moss Business Park was originally excluded from being a mixed use site because White Moss is a relatively new development and was specifically designed for B1 office use. However, given the economic climate and lack of demand for office space at the moment and in line with the NPPF, the Council will consider allowing uses classes C1 (Hotels) and D2 (Non-residential institutions) at White Moss as it is believed that this will allow flexibility of use of the site whilst protecting the integrity of the development, and still generating significant employment opportunities.

Recommendations for change as a result of consultation

- Changes to uses allowed on White Moss Business Park

Recommendations for change as a result of the NPPF / other policies

- None

Policy EC2: The rural economy

Objections	Support	Support with conditions	Observations	Total
5	2	5	1	13

What you said

3.133 Some felt that Policy EC2 should accord with the NPPF to support the change of use of agricultural properties. Some considered that the re-use of rural buildings for residential purposes should only be allowed if it can be shown that they are not appropriate for employment use.

3.134 It was suggested that the policy should also contain reference to supporting the roll out of high speed broadband to benefit the rural economy. It was emphasised that the Local Plan needs to address rural regeneration, especially for settlements which do not rank highly within the settlement hierarchy.

3.135 The land agents for Greaves Hall Avenue stated that EC2 designation is too restrictive and requested an alternative mixed use land designation under Policy EC3.

3.136 There was support for the promotion and enhancement of tourism and the natural economy within the policy.

Council response

3.137 Policy EC2 clearly states that where it can be robustly demonstrated that a site is unsuitable for ongoing viable use, the Council will consider alternative uses where this is in accordance with other policies in the Local Plan. As a general approach, the re-use of existing buildings within rural areas will be supported where they would otherwise be left vacant. The Council believes that this policy contains sufficient guidance whilst maintaining a degree of flexibility and meets the requirements of the NPPF.

3.138 In relation to Greaves Hall Avenue, the Council believe that this site is well located to meet rural employment needs, especially given its proximity to Southport New Road. Alternative sites providing mixed uses can be found nearby in more appropriate locations.

Recommendations for change as a result of consultation

- Amendments to wording of the first section of the policy to avoid mis-interpretation
- Additional wording relating to WLBC Level 2 SFRA to be added regarding site at Greaves Hall Avenue, Banks
- Additional wording to reference the Council's support of high speed broadband

Recommendations for change as a result of the NPPF / other policies

- None

Policy EC3: Rural development opportunities

Objections	Support	Support with conditions	Observations	Total
2	2	4	1	9

What you said

3.139 There was a request for the rewording of the policy in relation to flood assessments. The development of Alty's Brickworks was supported by the landowner. There was some reiteration of comments made in relation to EC1 and EC2.

Council response

3.140 Comments noted.

Recommendations for change as a result of consultation

- Additional wording relating to WLBC Level 2 SFRA to be added

Recommendations for change as a result of the NPPF / other policies

- None

Policy EC4: Edge Hill University

Objections	Support	Support with conditions	Observations	Total
11	20	5	3	39

What you said

3.141 People objected to the release of Green Belt to support Edge Hill University's extension. Some felt that the University is already too large for the town and cited problems such as traffic congestion, the loss of lower price housing to student houses in multiple occupation (HMOs) and anti-social behaviour. It was considered that expansion will exceed the demand for University places, as a result of high fees and falling student numbers, and is therefore unnecessary.

3.142 The policy should be amended to remove ambiguity in terms of how much land would be released from the Green Belt. The view was expressed that the proposed new Green Belt boundary should be defensible. There were also a number of criticisms that planning consent for the University's expansion had been granted prior to the Local Plan being found sound.

3.143 Support was received from other respondents for the expansion of the University because of the benefits it brings to the local economy and community and the jobs it creates. It was also felt the proposals would help to improve the management of traffic in Ormskirk. There were suggestions that student accommodation should be built on campus to free up housing in the town.

3.144 A number of statistical corrections to the text of the policy were requested by the University.

Council response

3.145 Concerns about Green Belt release for the University's expansion are noted, as are the issues relating to traffic and proliferation of HMOs. It is these two issues in particular that contribute towards the exceptional circumstances that justify releasing 10ha of Green Belt. The Council considers that allowing the development of a limited amount of Green Belt land will enable the University to meet current accommodation and parking needs (rather than to facilitate future growth in numbers), which in turn can help address the wider traffic and HMO issues. Due to the benefits that the University contributes to the economy and local community and the benefits of new student accommodation, parking and highways improvements and improved sports facilities facilitated by the small amount of Green Belt release, the expansion of the Campus is considered to demonstrate exceptional circumstances.

3.146 The effect of student fees and course types on student numbers will be monitored. The policy is considered sufficiently clear in limiting the release of Green Belt to 10 hectares, and controlling future development in the Green Belt (which would be limited to uses appropriate within the Green Belt) via a masterplan. The boundary of the area proposed for Green Belt release follows an existing line of trees and hedges and is considered robust and defensible.

3.147 The timing of the submission of two recent planning applications by the University was beyond the Council's control. These applications were determined in accordance with the development plan, taking into account relevant material considerations, including the issues mentioned above, and the emerging Local Plan.

3.148 The statistical corrections suggested by the University to the introductory text to the policy are agreed.

Recommendations for change as a result of consultation

- Minor change of wording in introductory paragraphs.

Recommendations for change as a result of the NPPF / other policies

- None



3.7 Chapter 7: Providing for housing and residential accommodation

Policy RS1: Residential development

Objections	Support	Support with conditions	Observations	Other	Total
96	6	5	12	1	120

A petition of 277 names objecting to the development at Chequer Lane and Mill Lane (Plan B) was also received.

What you said

3.149 There was support for locating the majority of development in, or on the edge of, Key Service Centres as this would support sustainability.

3.150 Several people expressed the view that the housing requirement should be delivered on brownfield sites, and that only once such sites were developed should greenfield land be considered. A number of objections focused on the re-designation of greenfield land to allocations for residential uses, and the loss of agricultural land and / or recreational land to housing.

3.151 Attention was drawn to the fact that there are empty properties within the Borough, and it was stated that these should be taken into account when determining housing targets.

3.152 The housing target for Skelmersdale was considered over-ambitious and potentially undeliverable. Caution was advised in attempting to predict the rate of delivery of housing completions in Skelmersdale over the plan period, as delivery rates in the past have been relatively low. It was recognised that housing in Skelmersdale town centre, and the wider sites, will play a critical role in supporting town centre investment and regeneration. Others considered that, as Skelmersdale has enough low cost housing, development should be working to attract second time buyers which would create more profit, support new businesses and jobs and help to regenerate the town.

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3.153 There were calls that Ormskirk should take more residential development, as it is 'punching below its weight' and could deliver much more in terms of sustainable housing. It was felt to be unsustainable not to enable more housing in Ormskirk and this could jeopardise the Council's ability to meet its housing targets, thereby making the plan unsound.

3.154 There was an objection to the lack of allocation of any housing sites in key sustainable villages, notwithstanding those sites allocated under Policy EC3 for mixed use developments.

3.155 Some respondents suggested alternative sites that could be considered, including Sutton Lane, Tarleton; Bold Lane, Aughton; land at Banks, and land off Sluice Lane, Rufford. It was emphasised that any housing developments in the Northern Parishes must be considered in conjunction with improvements to transport, water supply, sewage disposal and drainage.

3.156 There were concerns raised over the restrictive level of development within the rural villages. In addition, the viability of 100% affordable housing schemes was also questioned. Limiting development to such schemes may ultimately have a negative effect on the amount of affordable housing delivered in the villages. There were suggestions that housing policy should put stronger controls on private landlords to assist with housing rent affordability.

3.157 There was a concern that the 20% requirement for elderly accommodation provision is ill-defined. Whilst it was acknowledged that there is an ageing population in West Lancashire it was felt that there is insufficient justification or basis for the 20% requirement. Furthermore, it was considered that the expectation for new homes to meet the Lifetime Homes Standard is also unjustified and could render developments unviable.

3.158 It was suggested that the density policy needs refining. There should be variation within the density requirements to enable flexibility to reflect the character of surrounding areas and enable high quality design housing.

3.159 Some objectors expressed the view that the local infrastructure could not cope with the proposed housing on allocated sites.

3.160 It was questioned whether the Council could apply their own local standard, approved by local legislation, in relation to building standards.

3.161 There were a number of representations received specifically in relation to Grove Farm, Chequer Lane, and Firswood Road, with their grounds outlined below.

Grove Farm, Ormskirk

3.162 Objections were received in relation to Grove Farm on the grounds that it would permit Ormskirk and Burscough to move closer together and that additional traffic from the development would create severe traffic problems in and around Ormskirk town centre. There were also concerns raised that the waste water treatment from this development would need to be directed to Burscough's New Lane treatment works without any evidence that improvements would be made using financial contributions. The site currently suffers from flooding.

3.163 There were also concerns about potential social issues stemming from its proximity to the Scott Estate, such as an increase in crime and vandalism. Objections were also received on the grounds of protecting wildlife on the site.

3.164 There were suggestions that Grove Farm should be excluded from the plan completely and replaced by smaller developments from sites within the Plan B such as Ruff Lane and Parr's Lane. It was considered that development to the south of the town would benefit from ready access to the motorway.

3.165 The developer with an interest in the Grove Farm site proposed that the site should be expanded slightly northwards to enable a better development of the 250 houses required, given constraints limiting development on particular parts of the site.

Chequer Lane, Up Holland

3.166 Concerns were raised that Up Holland is becoming over-developed and is losing its village character. Up Holland should not be considered alongside Skelmersdale in terms of housing allocations and targets.

3.167 There were calls for traffic calming measures to be included with any future development, to prevent traffic using roads as 'rat-runs' and to direct traffic onto the main roads. It was suggested that the development on Chequer Lane would impact on the local environment, create increased traffic levels and reduce off road parking for residents. It was felt that this would be in contravention of the Local Plan's guidance on housing density and highway safety.

3.168 Some felt that the development of the Chequer Lane site does not protect small hamlets and does not guard against developers cherry picking inappropriate sites. It was considered that the site has environmental constraints such as its close proximity to a nature conservation site, and adjoining an attractive landscape. There were also concerns about flooding.

3.169 It was reported that a noise level study predicting that noise levels in the area will increase (to 2040) as a result of quarrying at the adjacent Ravenhead brickworks, potentially reaching levels of category C noise, means that planning permission should not normally be granted. For these reasons, it was suggested that development at Chequer Lane should not be considered.

3.170 There were further criticisms directed at the Council in response to the lack of publicity about the proposals.

Firwood Road, Lathom / Skelmersdale

3.171 Some expressed the opinion that Firwood Road belongs to Lathom South Parish, and as such, should be considered under the policy for small rural areas. Development would unbalance the area and would not be appropriate to the scale and character or needs of the Parish. Whilst it was acknowledged new homes are needed in the Parish, these should be for a small number of affordable homes and retirement bungalows only. It was not considered that the Firwood Road area would help to regenerate Skelmersdale or that the housing market warrants this number of houses to be built.

3.172 Comments were received objecting to overlooking, the potential devaluation of properties, the loss of private views and the loss of enjoyment from the residential gardens adjacent to the site. It was unfair that people should buy a home in a rural area only for it to be turned into a housing estate. There were also fears that crime and vandalism would occur or increase due to the area 'merging' with Skelmersdale. Other issues included noise, traffic, loss of wildlife, environmental pollution, poor transport links and infrastructure, poor economy and site accessibility. Respondents felt that Green Belt and agricultural land should not be lost from this area, and that other more suitable brownfield and greenfield sites were available.

3.173 It was felt that current proposals for Skelmersdale are being made on the basis of what land is readily available, rather than what it best for the town. However, many other comments were received suggesting that Skelmersdale has never reached its planned capacity and so development should be focused there.

3.174 It was not considered appropriate for development of the residential sites around Skelmersdale to subsidise residential developments in Skelmersdale town centre.

3.175 However, Firwood Road also received some support because the land is available, accessible and deliverable.

3.176 Concerns were also received in relation to traffic and the protection of land at the proposed housing sites at Whalleys and Cobbs Clough.

Council response

3.177 Justification for the housing targets, and the choice of housing sites to be allocated, is set out in the Housing and Strategic Options and Green Belt Release Technical papers.

3.178 Whilst the development of brownfield land in the first instance is supported, the amount of such land in West Lancashire is not enough to meet development needs and therefore greenfield and Green Belt land has been allocated. The Local Plan must be deliverable, and to insist that all brownfield sites are developed before any greenfield sites are commenced is not considered to be a deliverable or sound strategy, and could result in a housing land supply well below required levels, which could leave the Council susceptible to planning appeals. This could well result in agricultural land being lost to development anyway, with the Council having less control over where.

3.179 Due to a shortage of suitable sites within areas excluded from the Green Belt, it has been necessary to propose Green Belt release or the redesignation of sites in the Local Plan to meet development requirements. It is agreed that agricultural land should, ideally, be preserved, but unfortunately this is not always possible. The vast majority of the Borough's agricultural land will be protected, as it is a recognised resource. If any recreation space should be lost as a result of development, then it would be replaced elsewhere in the locality.

3.180 The Council support the principle of getting empty properties back into use. Currently, about 3% of the Borough's housing stock is empty, and such a figure is normal and necessary to help the housing market function. There is no scope to reduce this figure by any significant amount and, consequently, empty properties cannot be considered in the Council's housing targets.

3.181 The target for Skelmersdale was reduced as, during the previous consultation, it was considered undeliverable. Whilst the current target is ambitious, it is considered deliverable.

3.182 It is agreed that Ormskirk is a highly sustainable settlement. However, land supply is constrained by a lack of suitable sites within the urban area, and various issues (e.g. traffic, visual impact) with Green Belt sites around Ormskirk.

3.183 Within Rural Sustainable Villages, market housing is allowed. Housing development in Small Rural Villages will be more constrained in order to protect their rural characters, although the revised policy will allow a small amount of infill market housing.

3.184 With regard to accommodation for the elderly, the policy has deliberately been worded to allow for a range of different types of elderly accommodation, rather than specifying just one type (e.g. sheltered housing). The high projected proportion of elderly households is considered adequate justification for imposing a 20% requirement. It is not considered that provision of accommodation for the elderly should have any significant negative impact upon viability, given there will be demand for such accommodation, and its price should compare favourably with general market housing.

3.185 With regard to infrastructure, the Council have consulted with the relevant agencies, including the Highways Authority, Utilities companies and social infrastructure providers about the suitability of development on the proposed sites and no objections were raised. Where infrastructure issues are known, they will be resolved prior to or through development, as stated through the Local Plan. The level of detail and mitigation measures will be applied at the planning application stage, and may include measures for drainage or traffic.

Grove Farm, Ormskirk

3.186 The northern part of the Grove Farm site was not proposed for Green Belt release and included within the housing allocation because, by doing so, this would close the strategic Green Belt gap between Ormskirk and Burscough, albeit only by a small amount and that the gap would still be over 1km. On further consideration, given the constraints affecting certain parts of the Grove Farm site that would limit development and force an inappropriately high density of development on the remainder of the site, the ability to landscape the northern boundary of an expanded site sufficiently to minimise impact on the rest of the Green Belt and the opportunity to include land in a narrow strip alongside the railway line between Ormskirk and Burscough (to remain in the Green Belt) for the provision of a linear park / cycle route between the two towns, the inclusion of the northern part of the site in the allocation could be justified.

Chequer Lane, Up Holland

3.187 Up Holland and Skelmersdale have been considered together in planning terms since the development of Skelmersdale New Town. The only exception was the 2006 Local Plan where they were separated to allow for restraint in Up Holland and development (to aid regeneration) in Skelmersdale. Now that the policy of restraint is no longer supported regionally or nationally, it is felt appropriate to consider the settlements together in the same policy category. Over 90% of the housing target for Skelmersdale / Up Holland is expected to be

delivered within Skelmersdale. Green spaces between Up Holland and Skelmersdale are subject to policies preventing built development, which should help the two settlements stay relatively detached.

3.188 Development at Chequer Lane will not contravene the housing density section of Policy RS1. Although an outline application is currently being considered and the density is not specified, it does appear to be in the order of 30dw/ha which meets the requirements.

3.189 In relation to noise levels at Chequer Lane, whilst it is accepted that the report (associated with the planning application) concludes that noise from quarrying, even with an acoustic barrier, would mean approximately half of the site would fall under Category C, the report goes on to recommend that double glazing, and appropriate orientation of houses and location of habitable rooms would be enough to mitigate against the quarrying noise, which would be sporadic. Although it is recognised that there will be noise from the M58, which could increase in wet and / or windy conditions, there are a significant number of residential properties nearer to the motorway (and other, busier motorways) elsewhere.

Firwood Road, Lathom / Skelmersdale

3.190 Whilst Skelmersdale was originally intended to accommodate 80,000 people, the way the town has developed means that a population of this magnitude is no longer achievable. Firwood Road has been designated as Safeguarded Land to meet future development needs since the 1990s and is now needed to meet development needs for 2012-2027. If housing is built there, its design should have regard to existing dwellings.

3.191 Concerns over the loss of protected species are dealt with through Policy EN2 which states that 'where there is reason to suspect there may be protected species on or close to a proposed development site, planning applications should be accompanied by a survey assessing the presence of such species, and, where appropriate, making provision for their needs'.

3.192 It is agreed that there is a need to provide a range of housing in Skelmersdale in terms of cost / size and tenure. The Local Plan allocates land for over 1,850 units in Skelmersdale, the majority of which will be private market housing. There is, however, a need for affordable housing as well in Skelmersdale, despite a good number of low-cost properties in the town.

3.193 It is not considered appropriate or reasonable to equate new development with crime.

3.194 In relation to land at Cobbs Clough and Whalleys, it is recognised that the proposed housing in Whalleys will generate traffic but if this is likely to cause an unacceptable increase on Cobbs Brow Lane, measures will be put in place at a planning application stage to address this issue. Whilst the land between Skelmersdale and Dalton does not have Green Belt status, it is subject to the next strongest policy of protection. The Council have no intention of allowing development on this land. Sites have been chosen in north Skelmersdale, as this is where land is available.

Recommendations for change as a result of consultation

- Extension of Grove Farm allocation alongside inclusion of new linear park in Policy IF2 and Policy EN3
- Addition of 'character' to part (c) (garden land development) of the policy
- Change of wording regarding the Lifetime Homes Standard and it needing to be met once mandatory
- Clarification of wording with regard to the provision of accommodation for the elderly

Recommendations for change as a result of the NPPF / other policies

- Allowance for some infill market housing development in Small Rural Villages
- Change of wording to part (f) of policy to reflect presumption in favour of sustainable development



Policy RS2: Affordable and specialist housing

Objections	Support	Support with conditions	Observations	Total
19	4	2	4	29

What you said

3.195 The principle of affordable housing was generally supported. It was emphasised that the design of schemes should allow residents to walk and cycle to facilities in the neighbourhood, ensuring sustainability and also helping to support healthy living and promote exercise.

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3.196 It was stated that affordable housing is particularly needed in Ormskirk due to the number of properties that have been converted into student lets. It was suggested that the Council should enable empty business properties to be converted into residential accommodation to relieve the pressures. Affordable housing provision was also supported for Burscough.

3.197 Specific sites that could be used for affordable housing were suggested, including sites in Mere Brow and The Gravel, Banks. Other respondents objected to more affordable housing in Banks on the basis that a large amount has already been approved and developed in the area.

3.198 The majority of objections received to Policy RS2 were in relation to viability, which is recognised as a major factor in regard to development schemes. There were suggestions that the figures for the proportion of affordable housing would prove difficult to meet as affordable housing delivery is difficult already and a figure of 35% could jeopardise the viability of schemes. It was recommended that the 35% requirement should therefore be removed, or reduced to 30%.

3.199 There were other requests that the affordable housing threshold should be increased from 8 to 10 units or more in line with the current interim housing policy. The viability of 100% affordable housing sites was questioned with the advice that an element of market housing needs to be introduced into such schemes. However, some insisted that small rural plots should be identified that can deliver 100% affordable housing for the benefit of the local community.

3.200 Others supported the affordable housing requirement and suggested that if schemes are unable to deliver the full affordable housing requirement they should demonstrate robust evidence as to why this is the case.

3.201 It was suggested that where a residential scheme can enable the delivery of other plan objectives or planning benefits, the Council should not require provision of any affordable units.

3.202 There were calls for specialist housing to be defined and justified, and there was an objection to the 80% social rented tenure, which was deemed to be unjustified. There was a complaint that no requirement has been set for the provision of social housing provision for the elderly. It was felt Policy RS2 should allocate specific sites for accommodation for the elderly and grant special planning status to such developments. It was requested that the Council acknowledge the role that owner-occupied schemes play in meeting older person housing needs and providing housing choice.

Council response

3.203 The threshold of 8 units for affordable housing provision is considered viable and reasonable. The Affordable Housing Viability Study advised that the threshold could be as low as 3 units, however this was not chosen so as not to prevent developers, particularly smaller builders, from building in the first place and the Council then losing out on attaining any affordable housing. It is considered that a lower limit of 8 units provides an acceptable balance between obtaining affordable housing and encouraging housing development in the right places.

3.204 The Viability Study also concluded that a 35% affordable requirement was also viable. The policy allows for the percentage requirement to be varied as the economy changes, should robust evidence demonstrate that the Council are significantly 'missing out' on affordable housing through an SPD.

3.205 Policy RS2 already states that viability will be taken into account on a case-by-case basis. Calculations will take account of costs such as open space provision and meeting the Lifetime Homes Standard. Units designed for the elderly may not necessarily lead to extra expense being incurred for developers.

3.206 100% affordable housing schemes have been delivered in the Borough in recent years.

3.207 The affordable housing recently granted in the Northern Parishes, whilst significant, has not been enough to meet needs. It is agreed that affordable housing delivery is difficult in rural areas, but it is also necessary.

3.208 Policy RS2 refers to specialist housing for the elderly and gives examples. This approach is considered more flexible and preferable than attempting to define exactly what specialist housing comprises (a definition of which could change over time). The 80% social rented tenure requirement is explained and justified through the supporting studies of the Local Plan.

3.209 Overall the Council consider that Policy RS2 strikes the right balance between delivering affordable housing and ensuring requirements are not so high to make development unviable and discourage development from happening.

Recommendations for change as a result of consultation

- Clarification of affordable housing policy in Small Rural Villages
- Inclusion of 'size and type' as one of the considerations taken into account for affordable housing developments
- Make more explicit the reasons / justification for the 35% affordable housing requirement
- Expansion and clarification of the policy justification with regard to exceptional off-site provision of affordable housing

Recommendations for change as a result of the NPPF / other policies

- None

Policy RS3: Provision of student accommodation

Objections	Support	Support with conditions	Observations	Total
2	2	2	1	7

What you said

3.210 There was general support for the provision of student accommodation in Ormskirk and the restriction on houses in multiple occupation (HMOs). However, the opinion was expressed that all streets and roads in Ormskirk should have a 5% HMO restriction placed on them, that the policy should take account of the effects of 'clustering' of HMOs, and that parking for HMOs should be addressed.

3.211 One objector requested that the HMO restrictions be extended beyond the Ormskirk / Aughton / Westhead area. Another pointed out that purpose-built student accommodation has similar impacts to general housing upon foul water drainage, and that it should be subject to the same restrictions in terms of the timing of its development.

Council response

3.212 The Council consider it appropriate to allow more than 5% of properties to be HMOs in certain busier streets close to the University. It was agreed that the policy justification could be expanded with regard to the effects of clustering.

3.213 It would not be possible to extend the area covered by Policy RS3 without creating a new Article 4 Direction, a separate process from the Local Plan. The Council will continue to monitor the situation and could consider further Article 4 Directions in future, if necessary. Student accommodation at Edge Hill will have appropriate conditions imposed with regard to foul drainage.

Recommendations for change as a result of consultation

- Addition of sentence to policy justification regarding the imposition of conditions relating to foul drainage
- Expansion of justification regarding the effects of clustering of HMOs

Recommendations for change as a result of the NPPF / other policies

- None

Policy RS4: Provision for gypsy & travellers and travelling show people

Objections	Support	Support with conditions	Observations	Total
1	2	1	0	4

What you said

3.214 The policy was criticised because no timescale or methodology is provided through the policy to stipulate how pitches will be delivered. It was felt that the policy also needs to be criteria based to adhere to national policy directive. It was recommended that pitch figures should be a minimum figure, not maximum, and there should be no limit on the number of sites. Restricting all sites to broad locations was deemed to be unnecessarily restrictive although allocations to meet existing need in those locations should be a priority. The proposed broad locations were supported as they are not in areas at high risk of flooding.

Council response

3.215 The Council acknowledge that there is an unmet need for provision and is attempting to meet this need through the Policy. Under the new national planning policy guidance for traveller sites, authorities can now set their own targets based on historical demand. The Council's targets have been set using historical demand and using information gathered from the Lancashire Sub Region Gypsy and Traveller Accommodation Assessment. However, any sites will be built / managed by private developers and therefore delivery is outside the realms or control of the Council. Subsequently, it is difficult to provide a delivery timescale.

Recommendations for change as a result of consultation

- Removal of word 'maximum' in relation to pitch targets

Recommendations for change as a result of the NPPF / other policies

- Minor changes to policy in relation to sites in Green Belt as a result of new national guidance note 'Planning Policy for Traveller Sites'

3.8 Chapter 8: Infrastructure and services provision

Policy IF1: Maintaining vibrant town and local centres

Objections	Support	Support with conditions	Observations	Total
1	3	0	1	5

What you said

3.216 Wide support was received for this policy to promote, support and maintain the character of town centres. It was agreed that any major new retail development should be directed towards the three main town centres. It was felt that development proposals for town centre uses within or on the edge of the town centres should be supported where they are of an appropriate scale and function to that centre.



Council response

3.217 Comments noted.

Recommendations for change as a result of consultation

- Clarification of language to aid interpretation of policy

Recommendations for change as a result of the NPPF / other policies

- Clarification of sequential approach in town centres and specification of local thresholds for impact assessments in line with NPPF
- Minor amendments to wording with respect to office development to reflect the NPPF's inclusion of offices as a main town centre use

Policy IF2: Enhancing sustainable transport choice

Objections	Support	Support with conditions	Observations	Total
8	4	5	8	25

What you said

3.218 There was support for the creation of a rail station and rail link in Skelmersdale, and the electrification of rail-lines between Burscough and Ormskirk.

3.219 There were ongoing demands for the Ormskirk bypass to alleviate congestion through Ormskirk town centre. Some thought the Local Plan does not do enough to improve the road networks.

3.220 A greater focus is felt to be needed to encourage cycling and reduce traffic. Consideration needs to be given, particularly in Skelmersdale, about the safety of pedestrians and cyclists on the roads, especially around the proposed developments at Cobbs Clough and Whalleys.

3.221 It was considered the Local Plan should encourage carbon reduction through the use of low carbon and electric vehicles and promote the inclusion of charging points in development schemes. However, opposition to the provision of electric charging points was also received on the grounds that there is currently no justification to support their implementation.

3.222 It was suggested that the list of potential transport schemes should be prioritised to allow a focus on those schemes key to the delivery of the plan, which could then be included in the Community Infrastructure Levy. Improvements to Ormskirk bus station were supported.

Council response

3.223 The Ormskirk bypass is a long standing aspiration for both the Borough and County Council, however issues of funding mean that plans are continually put on hold. The Council will continue to support the bypass until such time that plans are completely ruled out. In the meantime, the Council is supportive of any smaller scale measures to relieve congestion in Ormskirk town centre.

3.224 The Council are encouraging cycling and a direct rail link to Skelmersdale and studies are currently being undertaken to better inform potential locations and routes. The Council is also working with Merseytravel to examine options for the electrification of the rail lines to Burscough.

3.225 The Council is fully supportive of initiatives which seek to increase transport sustainability, such as the provision of electric vehicle recharging points and travel schemes, although it is not considered that they need to be mentioned specifically within the policy.

Recommendations for change as a result of consultation

- Additional criteria added in relation to the support of small scale measures in Ormskirk to improve the highway network
- Inclusion of cross-reference with Policy EN2 as recommended by HRA
- Inclusion of fourth Linear Park, between Ormskirk and Burscough, reflecting Policy EN3

Recommendations for change as a result of the NPPF / other policies

- None

Policy IF3: Service accessibility and infrastructure for growth

Objections	Support	Support with conditions	Observations	Total
2	5	0	4	11

What you said

3.226 It was emphasised that improvements to waste water treatment are required in Ormskirk, Burscough, Rufford and Scarisbrick, and need to be phased to coincide with the delivery of an appropriate solution. This will ensure water quality is protected.

3.227 There was a request for a cemetery in Skelmersdale and Up Holland.

Council response

3.228 Comments noted. The responsibility of dealing with sewerage requirements lies with United Utilities. The Local Plan seeks to prevent unnecessary worsening of sewage and drainage and relates to the United Utilities spending programme which is likely to result in delivered improvements by 2020 at the latest.

3.229 There is no obligation on Local Authorities or Central Government as a whole to provide cemeteries or require others to do so, therefore the Council is responsible for the administration of existing cemeteries but not for the provision of new sites. Unfortunately, there are no plans to make such a provision within the Local Plan although there is existing planning consent for a crematorium at Pippin St, Burscough.

Recommendations for change as a result of consultation

- Change of wording to IF4 (ii) to: mitigate any negative impacts to the quality of the existing infrastructure as a result of new development

Recommendations for change as a result of the NPPF / other policies

- None

Policy IF4: Developer contributions

Objections	Support	Support with conditions	Observations	Total
6	2	1	2	11

What you said

3.230 There were objections that there is no inclusion of allotments. Reference to the canal network was recommended for inclusion under green infrastructure.

3.231 It was suggested that Policy IF4 needs to be flexible enough so as to ensure schemes are still viable following the payment of developer contributions through CIL or S106 agreements.

3.232 It was considered that additional requirements should be included within the policy to ensure developer funds are required to improve existing station facilities where development will cause an increase in patronage.

Council response

3.233 Establishment of the CIL will be informed by development viability and set at a level to allow flexibility and to avoid stifling development. S106 agreements will continue to operate on a site by site basis, ensuring they are only used to make that development acceptable in planning terms by mitigating site specific requirements.

3.234 A more detailed strategy for the delivery of allotments will be better placed within a Green Infrastructure Strategy which the Council wishes to progress in the future. The list of green infrastructure in Policy IF4 is indicative only and need not be exhaustive to include the canal network.

Recommendations for change as a result of consultation

- None

Recommendations for change as a result of the NPPF / other policies

- None

3.9 Chapter 9: Sustaining the Borough's environment and addressing climate change

Policy EN1: Low carbon development and energy infrastructure

Objections	Support	Support with conditions	Observations	Total
2	5	4	5	16

What you said

3.235 There was wide support for this policy. However, some felt that the inclusion of low carbon development requirements such as the Code for Sustainable Homes and BREEAM are outside of planning control and this overall approach is therefore flawed. They argued that there is no justification for requiring contributions to a community energy fund and this should therefore be removed from the policy. There was also objection to all developments exploring district heating due to concerns over viability. It was felt that policy EN1 is too prescriptive and may deter development. A more general and supportive policy was felt to be more appropriate.

3.236 There were concerns raised over the safer operation of the rail network in relation to wind turbulence (vibrations, shadow flicker), and that these need to be taken into account when determining applications for turbines.

3.237 There was an observation that there is no reference to shale gas extraction.

Council response

3.238 The Council intends to produce a Supplementary Planning Document (SPD) to provide greater detail to guide sustainable development and tackling climate change locally. The Council do agree that more guidance on the assessment of wind development should be included within the Policy itself.

3.239 National Planning Policy is clear that whilst it is the Government's intention to drive low carbon development through the tightening of building regulations, planning has a role to play in providing a supportive framework and ensuring development that passes through the development management processes capable of achieving higher standards of low carbon design as required through other regulations. Furthermore, the National Planning Policy Framework (NPPF) is clear that when setting any local requirement for a building's sustainability, this should be done in a way consistent with the Government's zero carbon buildings policy and nationally described standards, such as Code for Sustainable Homes, should be adopted. Policy EN1 seeks only to require development of the Code levels in line with increases to Building Regulations. Therefore is it not considered onerous on development but instead provides the necessary supportive framework to deliver low carbon development.

3.240 Gas extraction is a matter for the County Council as the minerals and waste planning body for the Borough. Policy EN1 supports renewable technologies which are appropriate to the Borough subject to balancing environmental impacts.

Recommendations for change as a result of consultation

- Wind development assessment criteria will be moved from the justification into the Policy itself
- Rewording of Policy EN1 1 (iii) to ensure it is not overly prescriptive but instead provides a sufficient hook for securing future contributions to offset carbon through an 'Allowable Solutions Framework' (currently still being drafted by Government).

Recommendations for change as a result of the NPPF / other policies

- None

Policy EN2: Preserving and enhancing natural environment

Objections	Support	Support with conditions	Observations	Total
4	4	5	2	15

What you said

3.241 This policy was widely supported. There was specific support for the protection of biodiversity, ancient woodlands, historic landscapes

3.242 There was a suggestion that trees should be replaced on a two for one basis to ensure the tree population is maintained at its current level at least and possibly may grow over time.

Council response

3.243 Comments noted. The policy will be altered to allow flexibility in relation to tree replacement.

Recommendations for change as a result of consultation

- Inclusion of paragraph in policy to address the need to balance visitor pressures with the need to protect biodiversity
- Update to Tree Policy, as advised by Council's Tree Officers

Recommendations for change as a result of the NPPF / other policies

- None

Policy EN3: Provision of green infrastructure and open recreation space

Objections	Support	Support with conditions	Observations	Total
24	2	3	5	34

What you said

3.244 Objections were predominately split between opposition to a linear park and a play area in Ormskirk. Of those objections in relation to the Ormskirk-Skelmersdale linear park proposals, local residents at Westhead who border the route objected on the grounds of increased crime and safety concerns, devaluation of properties, invasion of privacy, loss of private view, light pollution and multiple ownership problems.

3.245 Of those objections in relation to Elm Park play area in Ormskirk, local residents objected on the grounds of traffic safety, poor accessibility, increased crime and anti-social behaviour, devaluation of properties, close proximity of existing Coronation Park and loss of wildlife.

3.246 There were also objections to a lack of policy or provision of allotments. The provision of street trees, to help the environment and provide shade against climate change was also felt to be justified for inclusion in a policy.

Council response

3.247 Consultants conducted work in 2006 looking at the feasibility of the proposed route of the Ormskirk-Skelmersdale linear park. The report concluded that it is possible to develop the park although a number of barriers would have to be overcome first. The Borough Council and County Council are fully supportive of this scheme and are committed to seeing this scheme delivered. It is believed that the scheme can be delivered within the lifetime of the Local Plan. Whilst the Council are aware that many residents have concerns regarding this proposal and in particular have concerns relating to a perception of crime and anti-social behaviour, the Council believe that many of these concerns can be addressed through design and management.

3.248 The Council's Open Space, Sports and Recreation Study (2009) identified that Ormskirk has the greatest deficiency of children's play areas and as such is actively seeking to encourage new sites where appropriate. Given the limited availability of land to construct new play areas this site goes some way to helping the Council reduce the level of deficiency. The Council believe that if designed correctly any safety issues can be overcome. Environmental considerations will also be taken into account closer to the application stage.

3.249 Although allotments are not specifically mentioned they are seen as being an important part of green infrastructure and specifically as providing recreational use. Additional wording should be added to make specific mention to allotments.

3.250 Street trees are an important part of green infrastructure but specific criteria encouraging tree cover and requiring developments to include appropriate tree planting is included under Policy EN2.

Recommendations for change as a result of consultation

- Additional wording under criterion 1.i to include allotments
- Inclusion of fourth linear park between Ormskirk and Burscough in accordance with Policy IF2 and Grove Farm allocation in Policy RS1

Recommendations for change as a result of the NPPF / other policies

- None

Policy EN4: Preserving and enhancing built environment

Objections	Support	Support with conditions	Observations	Total
2	3	0	2	7

What you said

3.251 Comments were widely in support of the policy and reiterated its intentions. There was some call for greater flexibility in the policy to enable developments. Encouraging inspiring and imaginative design was supported.

Council response

3.252 Comments were noted. The Council are confident the existing policy is deliverable and allows for flexibility to enable development to come forward.

Recommendations for change as a result of consultation

- Repetition between Policies EN4 and EN3 to be removed

Recommendations for change as a result of the NPPF / other policies

- None



3.10 Chapter 10: Delivery and risk in the Local Plan - a Plan B

Chapter 10: Delivering and Risk - a Plan B

Objections	Support	Support with conditions	Observations	Total
18	2	3	3	26

What you said

3.253 Objections were received in relation to the loss of Green Belt land to provide the Plan B allocations. Objections to the Mill Lane site can be found under Policy GN2. Red Cat Lane was opposed as it is felt it fails to provide a defensible boundary against development and fails on infrastructure grounds, traffic and drainage.

3.254 There were further objections that land had not been included in the Plan B allocations. This included land to the north of Grove Farm, Ormskirk; land at Parrs Lane, Aughton and sites in Halsall and Haskayne. It was also suggested that the Local Plan should consider windfall development opportunities in the Northern Parishes in place of the Plan B sites.

3.255 As with comments made in previous sections of the Local Plan, many considered that there is no actual present or forthcoming need for housing, or housing land, in the Borough.

3.256 It was considered that Plan B infers that the preferred strategy is undeliverable, and rather than focus on allocating more sites for flexibility, the Council should instead concentrate on removing the prohibitions to development on the preferred strategy sites. It was submitted that Plan B is contrary to national policy, reiterating that deliverability should be resolved

through the plan itself and not through a Plan B. If Plan B is to be adopted, its implementation should be possible earlier than the five year review proposed, based on annual monitoring. The soundness of the Local Plan was questioned in this respect.

3.257 Concerns were held that the policy disincentivises developers from building on less profitable sites elsewhere in the Borough so the Plan B sites are released and they can then develop greenfield sites. This therefore makes the whole policy counterproductive.

3.258 Others welcomed the Plan B as a mechanism to address shortfall, although there were concerns about its triggers. It was suggested that a requirement of 310 dwellings per annum should be used, not the 260 quoted, for the first five years of the Plan. The Local Plan should also explain how Plan B sites are to be chosen for release. There were concerns raised over the appropriateness and deliverability of several of the Plan B sites with the suggestion that others should therefore be identified.

3.259 It was queried whether other means should also be explored should new development fail to deliver more than 80% of anticipated housing targets over a 5 or 10 year period. This may include the intensification of development within existing allocations, a review of the housing target or the release of other surplus sites which may have become available since the adoption of the Plan.

Council response

3.260 The only time that Green Belt boundaries should be reviewed is through the preparation of a Local Plan. Plan B sites need to be identified to ensure flexibility in housing delivery over the entire plan period and, for them to be deliverable, they cannot remain in Green Belt. The Council cannot earmark Plan B sites without releasing them from the Green Belt. However, given Plan B is only a back-up plan if the preferred strategy fails to deliver as anticipated, it would be hoped that the Plan B sites would remain in their current state, albeit no longer designated as Green Belt.

3.261 Whilst the release of the Red Cat Lane site from the Green Belt would not initially result in a stronger boundary to the Green Belt in this area, if it was developed it would 'round-off' the settlement area between Red Cat Lane and Moss Nook and create a stronger boundary to both the Green Belt and settlement area. If development of the site was anticipated to create traffic problems, the developer would need to rectify these issues as part of the development. The Council's information does not show any culverts under the land but drainage issues in Burscough are well documented and development on this site would need to ensure it does not make the local drainage issues worse.

3.262 Those Plan B sites that are affected by the same waste water infrastructure issues as the preferred sites for Green Belt release would, similarly, not be released in advance of the issues being resolved.

3.263 The Plan B sites in Halsall would rely on Sefton services and may attract Sefton residents, but the sites are in West Lancashire and can count towards meeting the Borough's needs. They have been selected because, compared to other sites considered elsewhere in the Borough, they do not fulfil Green Belt purposes and/or are more sustainably located.

Chapter 3 Written Representations on the Local Plan Preferred Options

3.264 The Council have chosen a Plan B approach in order to give a degree of certainty over the plan period and avoid any need for a formal Local Plan update or review which releases "surplus" sites that emerge, or further Green Belt sites, part way through the plan period. This is consistent with the NPPF's policy on not amending Green Belt boundaries frequently.

3.265 Given the rural nature of the Borough, intensification of existing allocations would not be suitable (and on the few sites it is, this has already been taken into account in delivering the housing target). Given that the housing target is based on housing need as evidenced by the CLG household projections, unless these projections fall over the plan period, it would be inappropriate to reduce the housing target unless neighbouring authorities were to deliver a proportion instead.

3.266 Flexibility in housing delivery is required by national planning policy. It bears no reflection on the Council's confidence in the preferred strategy. The five year review has been chosen in order to allow the Local Plan to become established and see whether it is working as intended before releasing more greenfield land.

3.267 As currently proposed, the annual target for the first 5 years of the Local Plan would be 260 dwellings. Therefore, any shortfall that Plan B sites may need to make up for after the 5 years would be in relation to the 260 dwelling annual target (1,300) not a 310 dwelling target (1,550). The 80% threshold was selected as a reasonable threshold that gives a degree of flexibility both ways. If the housing market is slightly slower to recover than anticipated, the 80% threshold gives the Local Plan the chance to recover the slight deficit more naturally over the course of the Plan period without having to release more greenfield land for development.

3.268 The five year views for Plan B are not proposed for monitoring purposes but to give certainty within the Local Plan period as to when Plan B sites might be released / required.

3.269 In relation to how Plan B sites will be selected from the list of 7 to make-up any deficit that emerges over the plan period, this will be a fresh assessment based on the latest evidence at the time of the 5 or 10 year review.

Recommendations for change as a result of consultation

- No change required

Recommendations for change as a result of the NPPF / other policies

- None

3.11 Chapter 11: Next steps

3.270 No comments were received against Chapter 11.

3.12 Appendices

Appendix A: Local Plan preparation

Objections	Support	Support with conditions	Observations	Other	Total
0	0	0	0	1	1

What you said

3.271 Support for development at New Lane, Rufford was registered by the landowner.

Council response

3.272 Comments noted.

Appendix B: Spatial and Strategic Objectives

Objections	Support	Support with conditions	Observations	Total
0	0	0	2	2

What you said

3.273 Emphasis on the need for monitoring and the flexibility of the plan was made.

Council response

3.274 The flexibility to change is dealt with through the policies. Regular monitoring will ensure that the plan can adapt to any changes.

Appendix C: Planning policy background

Objections	Support	Support with conditions	Observations	Total
0	1	0	0	1

What you said

3.275 Support for the updated explanation of the Planning Policy background was received.

Council response

3.276 Comments noted. The Appendix will be updated to reflect the final NPPF and Planning Policy for Traveller Sites document.

Appendix D: Setting locally determined targets

Objections	Support	Support with conditions	Observations	Total
1	0	0	0	1

What you said

3.277 There was a concern that the RSS deficit is a false figure as it occurred as a result of restraint to correct over development in preceding years. It was considered that that this makes an annual target of 250 dwellings more realistic.

3.278 Recommendations were made for the monitoring of objectives in relation to the Sustainability Appraisal.

Council response

3.279 It is clear from the Inspector's decisions on recent Examination of Local Development documents and from the Governments Growth Agenda that the Council are required to make up what has been termed the RSS deficit or 'pent up' need for housing that has yet to be delivered. Therefore, the housing target in the Local Plan must account for this.

Appendix E: Delivery and risk

Objections	Support	Support with conditions	Observations	Total
0	0	0	2	2

What you said

3.280 The Environment Agency registered concerns that on-site waste water treatment in sewered areas would be unacceptable. They felt the the proliferation of a large number of private treatment plans in publicly sewered areas is not considered to be a sustainable option and could detrimentally impact on the aims and objectives of the Water Framework Directive.

Council response

3.281 Comments noted.

Recommendations for change as a result of consultation

- Amend Contingencies for the Risks for Policy IF3 to remove reference to on-site waste water treatment

Appendix F: Parking standards

Objections	Support	Support with conditions	Observations	Total
0	0	0	0	0

What you said

3.282 No comments were received

Appendix G: Key amendments to the proposals map

Objections	Support	Support with conditions	Observations	Total
8	0	1	3	12

What you said

3.283 There were calls from landowners/agents for the re-designation of individual sites to support development. There were other calls that boundaries should be changed to include existing areas of hard standing and built areas belonging to areas already in the urban settlement areas.

3.284 A number of errors in relation to site references were pointed out.

3.285 The Environment Agency highlighted a list of constraints that apply in relation to certain sites.

3.286 There were criticisms that the maps were too small and thereby difficult to read.

Council response

3.287 Comments noted. A number of corrections will be made to labels, site references and settlement boundaries on the full Proposals Map to be prepared for the Publication Local Plan.

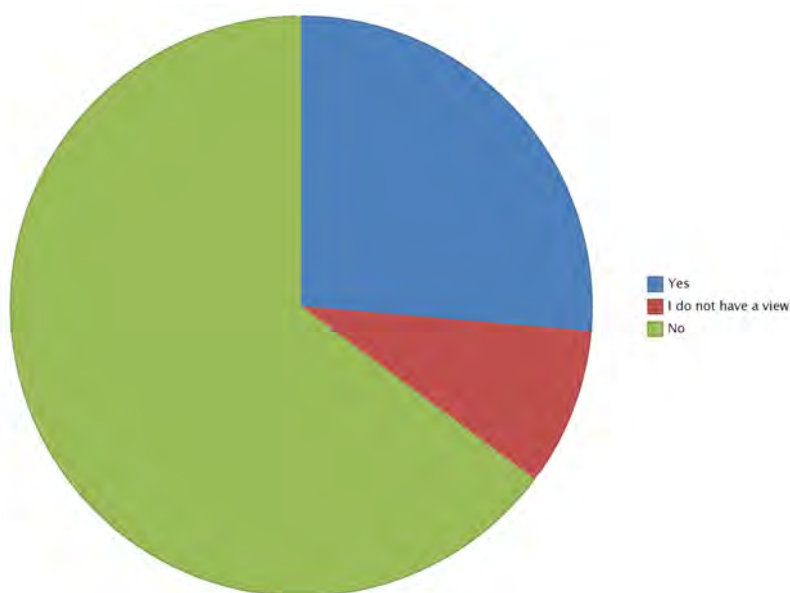
Chapter 4 General Survey

4.1 A total of 94 people completed the survey, either online or on paper.

Question 1: Do you broadly support the 4650 dwelling housing target and its distribution across the Borough?

4.2 26% of respondents to this question supported the target and its distribution. 65% did not. The remaining 9% did not have a view.

Picture 4.1 Housing targets and distribution



Question 2: Do you support the allocation of the following sites for housing development in Policy RS1?

Grove Farm

4.3 33% were in support. 33% were not in support. 34% had no view.

Firswood Road

4.4 44% were in support. 19% were not in support. 37% had no view.

Whalleys / Cobbs Clough

4.5 52% were in support. 13% were not in support. 35% had no view.

Chequer Lane, Up Holland

4.6 33% were in support. 27% were not in support. 40% had no view.

Question 3: Do you support the policy restricting the proportion of HMO's in Ormskirk?

4.7 56% supported restrictions on HMOs. 17% did not support the policy. 27% had no view.

Question 4: Do you think Policy RS4 provides for gypsy and traveller and travelling showpeople needs in the Borough?

4.8 30% of respondents supported the policy. 7% were not in support. 64% did not have a view.

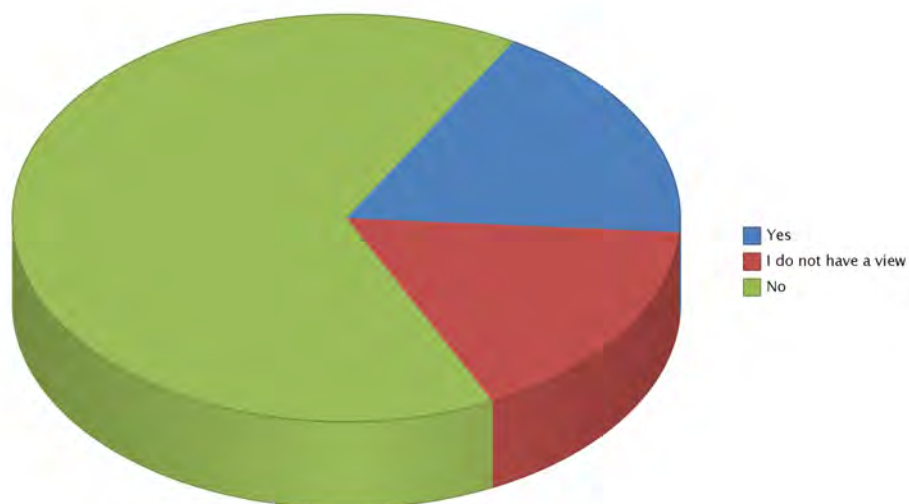
Question 5: Do you broadly support the 75ha employment land target and its distribution across existing employment areas?

4.9 52% were in support. 21% were not in support. 27% did not have a view.

Question 6: Do you think the Local Plan does enough to guide infrastructure development and improvements?

4.10 18% supported the Local Plan. 66% were not in support. 16% did not have a view.

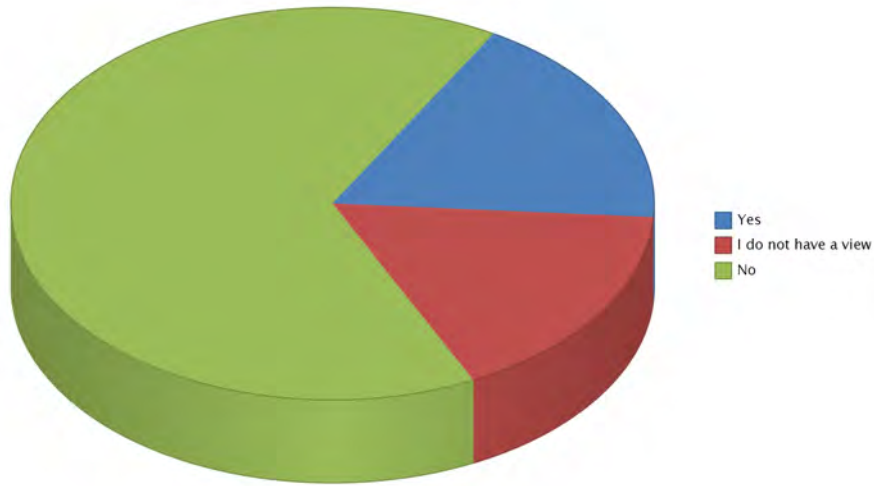
Picture 4.2 Infrastructure



Question 7: Do you think the Local Plan does enough to protect the Boroughs environment and seek sustainable development that addresses climate change?

4.11 18% supported the Local Plan. 66% were not in support. 16% did not have a view.

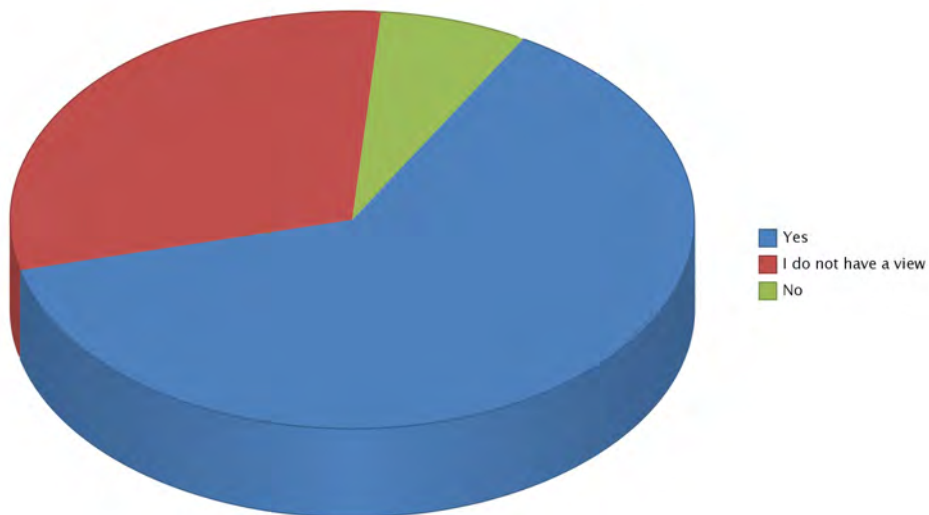
Picture 4.3 Environment



Question 8: Do you support Policy SP2 for the Skelmersdale Town Centre Strategic Development Site?

4.12 63% were in support. 7% were not in support. 30% did not have a view.

Picture 4.4 Skelmersdale town centre



Question 9: Do you support Policy SP3 for the Yew Tree Farm, Burscough Strategic Development Site?

4.13 21% were in support. 52% were not in support. 27% did not have a view.

Question 10: Do you support the concept of Plan B and the following sites to be safeguarded for the Plan B?

Parrs Lane, Aughton

4.14 27% were in support. 26% were not in support. 47% had no view.

Ruff Lane, Ormskirk

4.15 29% were in support. 33% were not in support. 38% had no view.

Red Cat Lane, Burscough

4.16 29% were in support. 39% were not in support. 32% had no view.

Mill Lane, Up Holland

4.17 26% were in support. 39% were not in support. 35% had no view.

Moss Road, Halsall

4.18 24% were in support. 29% were not in support. 48% had no view.

Fine Jane's Farm, Halsall

4.19 22% were in support. 33% were not in support. 45% had no view.

New Cut Lane, Halsall

4.20 25% were in support. 32% were not in support. 43% had no view.

Chapter 5 Spatial Forums

Skelmersdale Forum

5.1 Most people supported the distribution of housing but some considered that there should be more in the Eastern Parishes, particularly Parbold which was felt to be a sustainable village. A need to provide housing for older people and first time buyers was emphasised. A minority considered that the number of new houses set out in the Plan was not needed. Some felt that vacant properties should be looked at as a source of housing and that the Council should provide evidence to demonstrate they have considered brownfield sites before releasing Green Belt. The provision of more council housing was supported.

5.2 Concern was expressed regarding access to the proposed housing site at Firwood Road because the main road is a narrow country lane.

5.3 Attendees emphasised the lack of sustainable transport in Skelmersdale and stressed this is a huge issue. The rail link was discussed and supported.

5.4 Most felt that the regeneration of Skelmersdale through the town centre was a good opportunity. Provided sensitive design was used, it was felt additional housing in the Tawd Valley to improve access and links from existing housing areas to the Tawd for recreation was acceptable. There was support for more employment in Skelmersdale although attendees stressed that this should not be distribution facilities as the sector creates noise, affects residential amenity and does not create many jobs. Some felt there should be more facilities for young people provided. Some were concerned that the new shops proposed as part of the town centre regeneration are not wanted, or could not be afforded, by local residents. Green spaces within Skelmersdale were felt to be an important part of what makes the town unique and improves its attractiveness.

5.5 A cemetery in Skelmersdale was requested.

5.6 Many of the attendees at Skelmersdale came to represent opposition at Mill Lane. They raised concerns about traffic on Mill Lane, the loss of green park space, ground conditions, surface water flooding issues, loss of village character and a lack of infrastructure. An alternative site at Garnett Green was suggested as well as using employment land for housing.

5.7 Similarly there was no support for Chequer Lane and it was felt that Up Holland has been developed enough and that constraints apply to the site.

Tarleton Forum

5.8 Most attendees supported infill development, rather than the creation of large estates, and felt that infill was no longer being pursued. It was expressed that new housing should be complemented by new employment for local people, to address unemployment in the villages. Some suggested that all the new housing required should be located in Skelmersdale.

5.9 There were complaints that affordable housing is not for local people and is being occupied by those from outside of the local areas. With it, came concerns that the housing is bringing with it unemployed people. There were objections that affordable housing appears to be granted permission where market housing fails to obtain consent.

5.10 Some felt employment sites should be protected, and that if their development for employment is not viable then they should not be released for housing. Greaves Hall was supported for employment development but not for housing. It was suggested that the Altys Site development proposals should include a road over the River Douglas to Longton/Hoole to tackle traffic congestion. It was suggested that employment sites should be located close to the A565 to avoid traffic going through the villages.

5.11 Poor transport infrastructure in the Northern Parishes was emphasised. There were concerns raised over suitable and appropriate transport solutions.

5.12 Problems with water supply and flooding were also highlighted. A road across the River Douglas was requested, as the current bridge is open to damage and its closure would have severe impacts on traffic. There were serious concerns that too much development is being allowed, or encouraged, without the necessary improvements to infrastructure.

5.13 Some suggested that a policy to address agricultural workers dwellings should be included to prevent misuse. It was also suggested that the settlement boundary around the Tarleton Mill site should be extended further north to include green houses which are/were part of the wider site anyway. Community development was supported, possibly through neighbourhood planning and greater participation and involvement of the Parish Council.

5.14 Some attendees were opposed to the allocation of any Gypsy and Traveller accommodation in the Borough and was deemed unfair that the Council should be allowing such sites.

5.15 In relation to Burscough, some attendees supported the proposals for development at Yew Tree Farm considering that additional development would support economic development of Burscough. Some attendees stated they would rather see the Yew Tree Farm strategic site come forward with the associated benefits than smaller parcels of land that would provide no benefits. Others felt that no more development should be allowed in Burscough as the infrastructure could not cope and there was no faith that the necessary improvements would be made. It was considered that additional employment in Burscough would worsen the HGV situation on the already over-burdened roads.

Burscough Forum

5.16 A large number of attendees expressed concerns that traffic on the A59 and A5209 will get worse if the proposed development at Yew Tree Farm goes ahead. There were concerns that an increase in the size of the population will affect Burscough's character. Attendees requested that infrastructure improvements are guaranteed. Improvements need to include roads, public transport, schools, creation of wider pavements, a link road and improvements to drainage and utilities. A bypass was requested to alleviate current transport problems. It was emphasised that the worst problems with traffic are at school drop off and collection times. Poor access to Preston by rail was highlighted with demands for the electrification of the Burscough curves.

5.17 The non-preferred option was deemed to be a better option as the site has better transport links to the M58. There were doubts as to whether traffic calming measures would work, with calls that traffic (and development) should be moved elsewhere. It was requested that the public should be consulted on the route of any new roads and there were calls for cyclepaths to be introduced. Improvements to the reliability and frequency of public transport services need to be provided. Attendees felt that United Utilities should be more proactive and deliver improvements.

5.18 Support was shown for housing, in particular affordable housing, but improvements to facilities also need to be made such as facilities for children and young adults and leisure activities/services. There were concerns that too many houses were being proposed for Burscough, that new homes and jobs would be lost to 'outsiders' of Burscough, and that housing would be placed near industry creating fears over safety. Reassurances were needed. It was acknowledged that the development could help to support the village centre and the wharf and improve the economy.

5.19 There were suggestions that development could be spread in Burscough, although urban sprawl was highlighted as a concern. Others suggested development should be located in Ormskirk, Scarisbrick or Bickerstaffe. Some questioned whether the housing target for Skelmersdale could be delivered and suggested it would be better to release more Green Belt in Ormskirk and Burscough.

5.20 Some attendees felt employment development was not required as there are many empty employment units already. It was considered that Burscough is too rural for employment and large companies won't locate to the area due to the poor infrastructure. It was suggested employment should be located in Skelmersdale. Others felt there was demand in Burscough as well as a thriving employment area. Any empty units were considered to be related to the current economic market. Many felt that more skilled jobs should be created and available, that will be more secure and permanent than general service level employment.

5.21 There were worries that the views of Burscough residents are being ignored. There was a fair amount of cynicism that the planning system has failed to deliver improvements promised in the past (eg Heathfields). However, if the infrastructure could be guaranteed and brought forward ahead of the development then the Yew Tree Farm was felt by some to be acceptable.

Ormskirk Forums

5.22 Problems with sewage / flooding in Ormskirk at High Lane (opposite Grove Farm) were highlighted and these issues need to be addressed before any development on Grove Farm commences. There were further concerns over the landscape impact and view as Ormskirk is approached should the development go ahead. There were calls for traffic calming, speed reducing measures and signalised junctions to improve the safety of the site. There were further concerns over the amalgamation of Ormskirk and Burscough from the proposed developments.

5.23 There were general fears that Green Belt is being used, with the loss of agricultural land, and concerns about traffic as a result of the Yew Tree Farm proposed development. Some felt that the Yew Tree Farm site is just too big a site to develop, with far too many houses for the area, and development would be better dispersed around the Borough.

However, it was recognised the need for a critical mass in new developments to ensure that new infrastructure is provided. Some attendees believed the strategic development site in Burscough was an appropriate location .

5.24 Some felt Edge Hill University is too large and has detrimentally affected Ormskirk. There were criticisms that student housing in the town had removed affordable housing from the market. For this reason the Student accommodation and HMO policy was supported. There were suggestions that a campus should be located in Skelmersdale. Other suggestions included a multi-storey building on campus to meet development needs, rather than an extension into Green Belt. Some supported the expansion if it could sort out the problems relating to HMOs and traffic in Ormskirk. There was a suggestion that students should pay for on-campus parking in order to reduce traffic problems in Ormskirk.

5.25 There were requests that the affordable housing threshold should be dropped from 8 to 4 across the Borough as it does not secure the viability of development sites. Affordable housing was felt to be a particular problem in rural areas.

5.26 Improved rail links between Ormskirk and Burscough were supported, as well as demands for a Sunday service between Preston and Ormskirk. Some attendees called for an Ormskirk bypass, whilst others felt other alternatives were available.

5.27 There was some concern expressed that the Local Plan sterilises the land involved for the life of the Local Plan. It was asked why differentiate between Plan A and Plan B - could all of the sites not be available for development?

5.28 Some suggested that there should be less development and more in Ormskirk. There were further calls to make Skelmersdale more attractive

Results of the voting

5.29 At the end of each forum, attendees were asked to electronically vote against a series of questions with multiple choice answers. There were a number of objections raised by those voting including:

- Why should people from outside the area, or land owners/developers, be able to vote? And equally;
- How will we differentiate between voting by different settlement areas?
- What happens if you don't agree with the multiple choice answers?

5.30 The forums, and consultation, are designed to get feedback from all sections of the community, and therefore we have to allow everyone the chance to vote. The only people not allowed to vote at the forums were the Councillors (who get their chance to vote at Council meetings) and the landowner of the Yew Tree Farm site.

5.31 The voting exercise is not a popularity contest, and it is not the case that those with the highest/lowest amounts of votes win or lose. Instead, the voting is designed merely as an indication of general feeling.

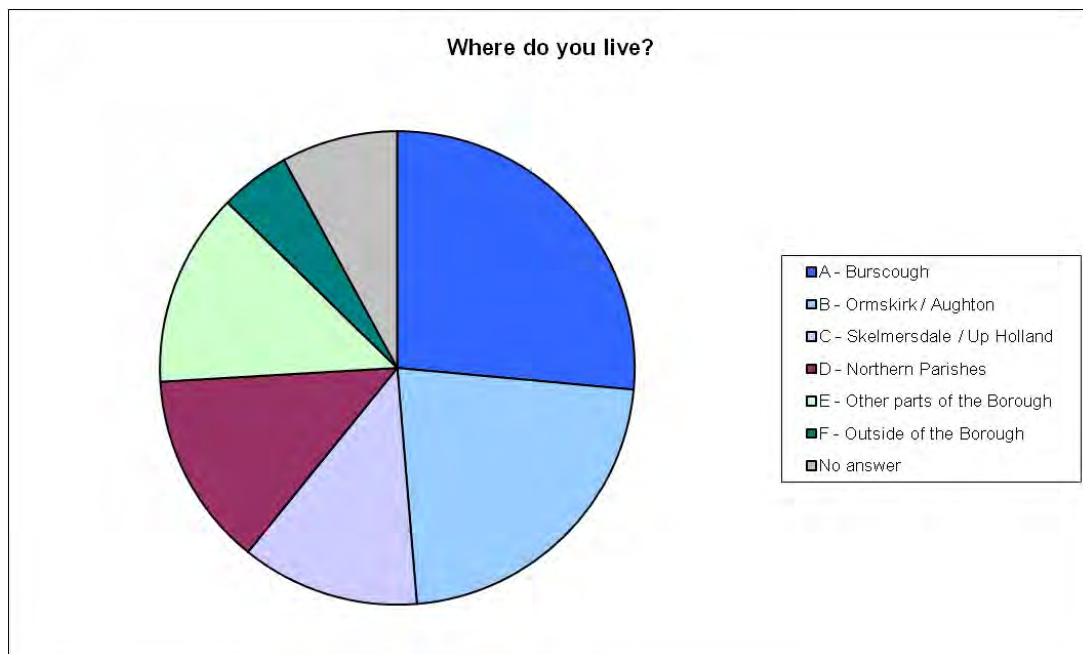
5.32 Using the demographic data collected through the initial questions, the Council can analyse the results of the voting based on the settlement area of the attendee. This way, regardless of which forum people attended, the results by each settlement residents came from, can be seen. Amalgamating the results from all the forums, shows a total of 189 people voted. The following distributions applied:

Table 5.1 Forum composition

Attendees from:	Number	Percentage
Burscough	50	26%
Ormskirk / Aughton	42	22%
Skelmersdale / Up Holland	43	12%
Northern parishes	25	13%
Others parts of the Borough	25	13%
Outside of the Borough	9	5%
No answer provided	15	8%
Total	189	100%

5.33 Just under half of all attendees came from Burscough and Ormskirk/Aughton.

Picture 5.1



Question 1: Do you broadly support the 4650 housing target and its distribution?

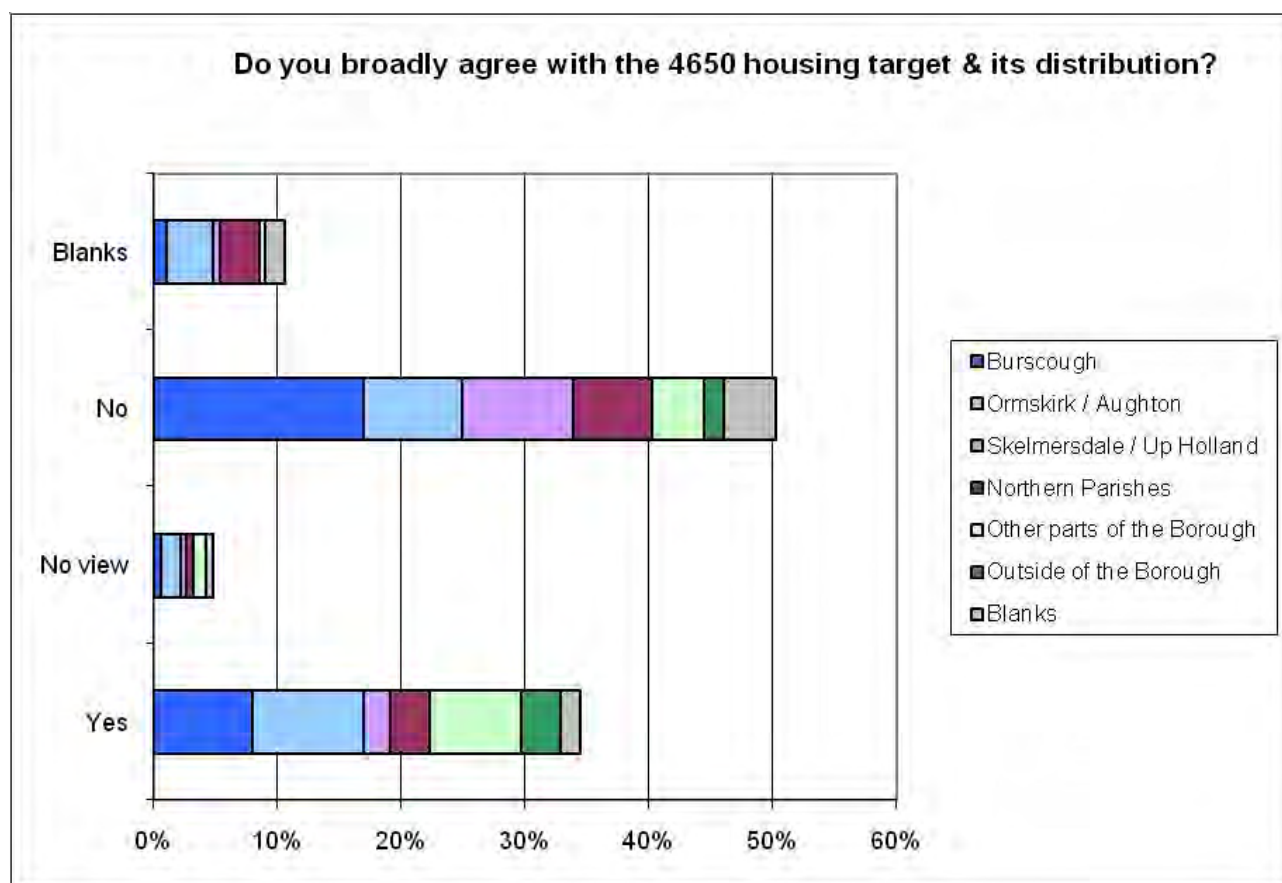
5.34 Overall, 34% were in support and 50% in objection. 17% of objections were from Burscough residents and 9% were from Skelmersdale residents.

Chapter 5 Spatial Forums

Table 5.2

Attendees from:	Yes	No view	No	No answer provided
Burscough	8%	1%	17%	1%
Ormskirk / Aughton	9%	2%	8%	4%
Skelmersdale / Up Holland	2%	1%	9%	1%
Northern parishes	3%	1%	6%	3%
Others parts of the Borough	7%	1%	4%	1%
Outside of the Borough	3%	0%	2%	0%
No answer provided	2%	1%	4%	2%

Picture 5.2



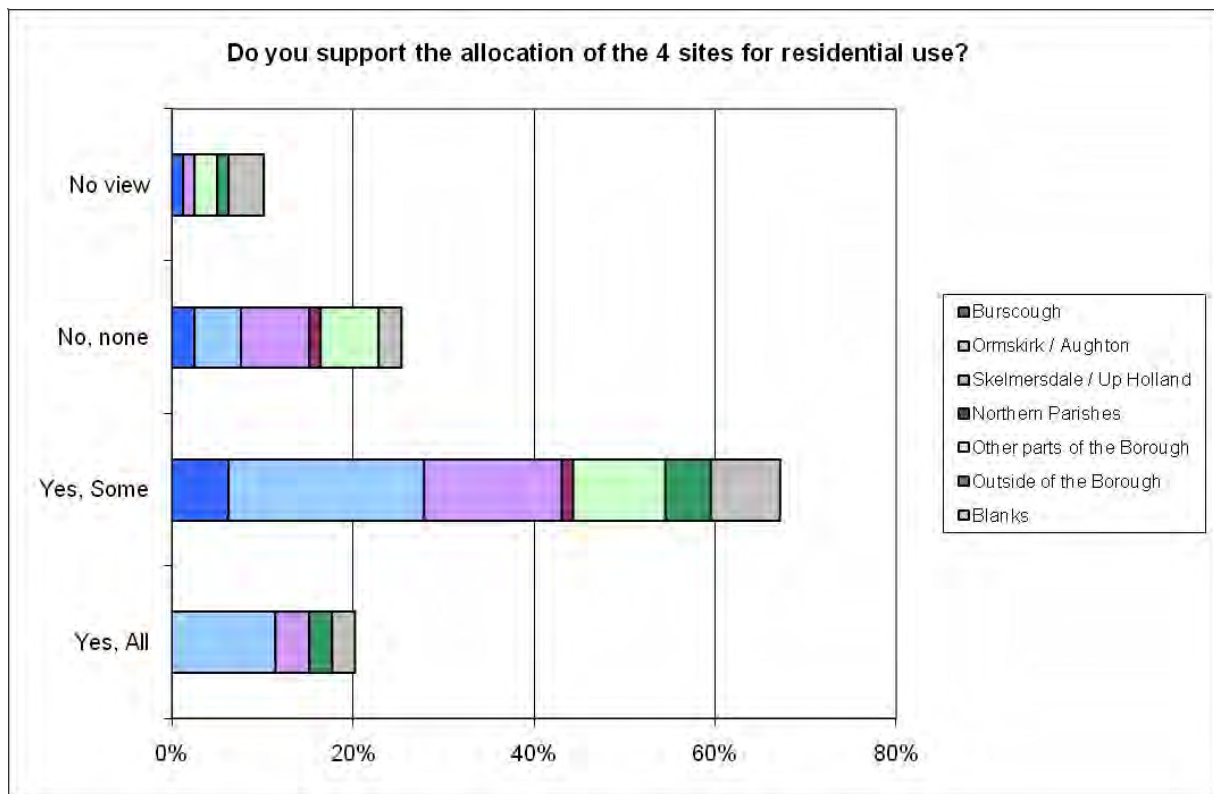
Question 2: Do you support residential development at Grove Farm, Firwood Road, Whalleys, Chequer Lane?

5.35 Of those to register a vote against this question, overall 71% were in support to all or some sites and 21% in objection.

Table 5.3

Attendees from:	Yes, all	Yes, some	No, none	No view
Burscough	0%	5%	2%	1%
Ormskirk / Aughton	9%	18%	4%	0%
Skelmersdale / Up Holland	3%	12%	6%	1%
Northern parishes	0%	1%	1%	0%
Others parts of the Borough	0%	8%	5%	2%
Outside of the Borough	2%	4%	0%	1%
No answer provided	2%	6%	2%	3%

Picture 5.3



Question 3: Do you support Policy SP3 for Yew Tree Farm, Burscough?

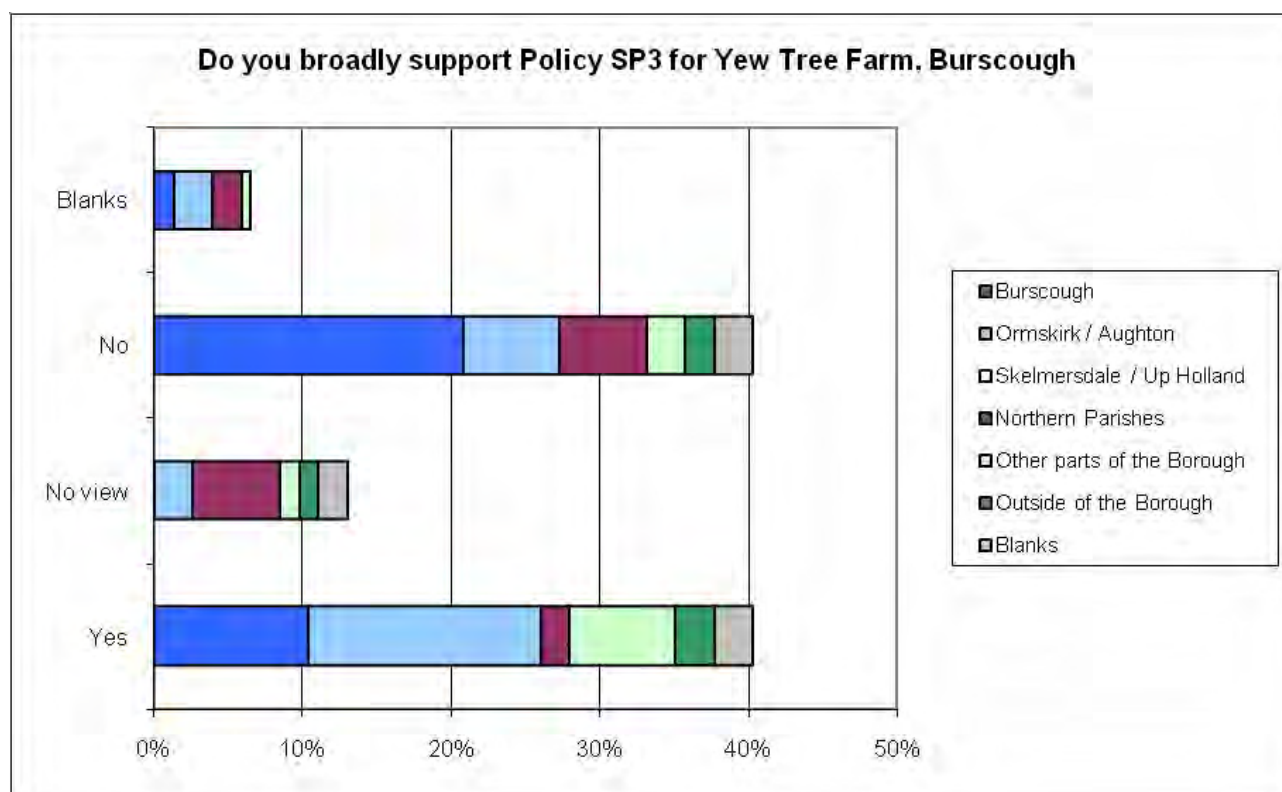
5.36 Overall, 40% were in support and 40% in objection. 21% of objections were from Burscough residents although 10% support also came from Burscough residents. A further 16% of support came from Ormskirk residents.

Chapter 5 Spatial Forums

Table 5.4

Attendees from:	Yes	No view	No	No answer provided
Burscough	10%	0%	21%	1%
Ormskirk / Aughton	16%	3%	6%	3%
Skelmersdale / Up Holland	0%	0%	0%	0%
Northern parishes	2%	6%	6%	2%
Others parts of the Borough	7%	1%	3%	1%
Outside of the Borough	3%	1%	2%	0%
No answer provided	3%	2%	3%	0%

Picture 5.4



Question 4: Do you broadly support the 75ha employment land target and its distribution?

5.37 Overall, 51% were in support and 27% in objection.

Table 5.5

Attendees from:	Yes	No view	No	No answer provided
Burscough	14%	1%	10%	2%
Ormskirk / Aughton	10%	1%	4%	2%

Attendees from:	Yes	No view	No	No answer provided
Skelmersdale / Up Holland	4%	5%	4%	1%
Northern parishes	5%	2%	5%	3%
Others parts of the Borough	10%	0%	4%	1%
Outside of the Borough	5%	0%	0%	0%
No answer provided	3%	4%	1%	1%

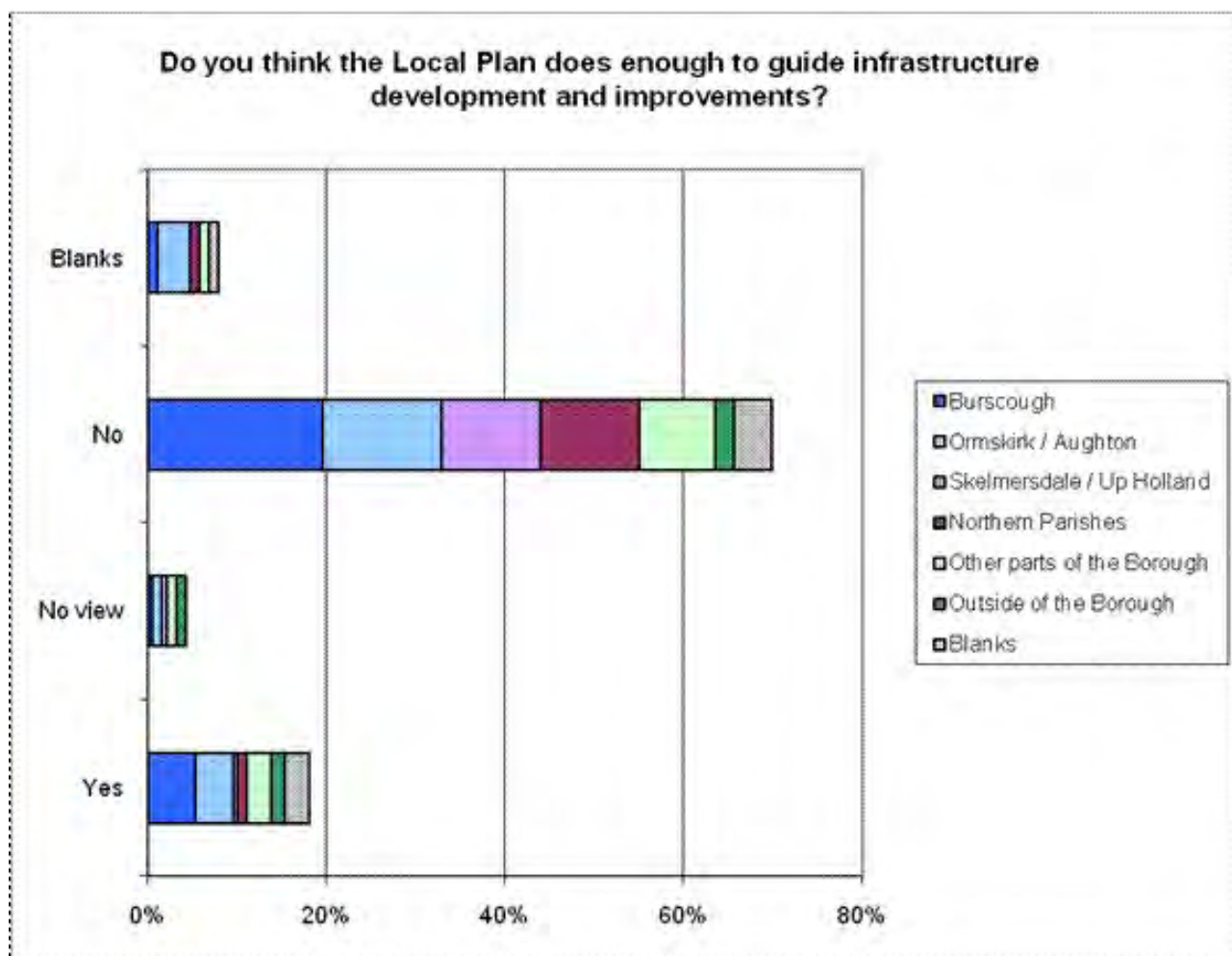
Question 5: Do you think the Local Plan does enough to guide infrastructure development and improvements?

5.38 Overall, 18% were in support and 70% in objection. The highest proportion of 'No' answers came from Burscough residents.

Table 5.6

Attendees from:	Yes	No view	No	No answer provided
Burscough	5%	1%	20%	1%
Ormskirk / Aughton	4%	1%	13%	4%
Skelmersdale / Up Holland	1%	1%	11%	0%
Northern parishes	1%	0%	11%	1%
Others parts of the Borough	3%	1%	8%	1%
Outside of the Borough	2%	1%	2%	0%
No answer provided	3%	0%	4%	1%

Picture 5.5



Question 6: Do you support the policy restricting the proportion of HMOs in Ormskirk?

5.39 This question was only asked at the Ormskirk forums. Overall, 76% were in support and 6% in objection.

Table 5.7

Attendees from:	Yes	No view	No	No answer provided
Burscough	8%	3%	1%	0%
Ormskirk / Aughton	44%	0%	0%	6%
Skelmersdale / Up Holland	0%	0%	0%	0%
Northern parishes	0%	1%	0%	1%
Others parts of the Borough	6%	1%	4%	1%
Outside of the Borough	7%	0%	0%	3%
No answer provided	11%	0%	0%	1%

Question 7: Do you support the concept of Plan B?

5.40 Overall, 51% were in support and 31% in objection. 38% were in support of some of the sites. Only 14% supported all of the Plan B sites proposed.

Table 5.8

Attendees from:	Yes, all	Yes, some	No, none	No view	No answer provided
Burscough	2%	14%	7%	1%	2%
Ormskirk / Aughton	5%	8%	5%	1%	4%
Skelmersdale / Up Holland	1%	2%	8%	2%	0%
Northern parishes	1%	5%	4%	2%	1%
Others parts of the Borough	3%	4%	3%	2%	2%
Outside of the Borough	1%	2%	2%	1%	1%
No answer provided	1%	4%	2%	1%	1%

Chapter 6 Business Breakfasts

What you said

6.1 A discussion at the business meeting raised a series of points. It was highlighted that there is currently a high employment unit vacancy in Skelmersdale and attendees questioned whether this could be used to meet some of the employment land need. There were concerns about how issues with infrastructure would be addressed.

Councils response

6.2 A study has been conducted to assess the capacity and usage of all the Borough's employment areas. As a result, the policy seeks to deliver all the new employment development in Skelmersdale through existing allocations and the remodelling of existing underused estates. The Council recognises the difficulties associated with this but is prepared to work with developers and other organisations to deliver this.

6.3 Infrastructure is addressed through the Infrastructure Delivery Plan. Beyond this, there is broader legislation to ensure utility companies provide upgrades and improvements to their network to support development. The Plan B sites will also provide flexibility, as most of the sites are not constrained by the waste water treatment issue. Transport pressure points, such as those on Briars Lane caused by HGV traffic, will be addressed by the County Council Highways Authority.

Chapter 7 Housing Developer Forum

7.1 A number of issues were discussed with housing developers.

7.2 It was considered that a number of the Plan B sites appeared to be constrained due to waste water constraints (actually only 2, totalling 70 dwellings). However, as Plan B caters for a greater number of dwellings (760 units) than is required (698 units), it is felt that there is enough unconstrained land to be able to support the plan if housing supply fell short. It was questioned whether Plan B should be triggered after two years so there would be time to recover any housing deficit.

7.3 It was explained that most of the DS4 land will be continued in the new Local Plan as protected land as the Council does not wish to see this land developed. The Moss Road site (as it is not currently in Green Belt) will not possess any advantage over the other Plan B sites if and when the time comes to choose which sites should be released for development. All the Plan B sites will be subject to the same 'safeguarding' policy.

7.4 It was suggested that the housing deficit should be made up over 5 years, not the plan period as a whole. It was felt that making up the deficit in the longer term would defer delivery and store up problems for later.

7.5 It was requested that the housing requirement should be increased, as recent trends in development have been limited by policy constraints. It was considered that a low requirement leads to low growth. The Council explained that the housing requirement has been chosen based on market conditions, rural and environmental constraints and past delivery of housing to ensure the targets are realistic. The Council considers that the proposed requirement is reasonable, reflecting demand and need and also deliverability.

7.6 There was further concern about the viability of Skelmersdale, particularly housing delivery in the town centre. Given that development phasing leans towards Skelmersdale in the first five years of the Plan, it was felt inevitable that the plan would fail and Plan B would be triggered. The Council hope that redevelopment of the town centre would make residential development there and elsewhere in the town a more attractive prospect.

7.7 There were concerns that the requirement in Policy RS1 for 20% of units to be designed specifically for elderly accommodation is too high. It was the housebuilders experience that people want to live in 'normal' properties and so the requirement may be unnecessary. It was suggested the 20% requirement should be included within the affordable housing requirement. It was considered that the focus and priority should be on helping first time buyers into the housing market, rather than supplying homes for the elderly.

7.8 It was suggested that the CIL burden could be lifted slightly by allowing stage payments. CIL should not detrimentally affect the viability and deliverability of housing. It was felt that both an exemptions policy and an instalments policy would be vital to ensure development does not stall in the Borough.

Chapter 8 Conclusion

8.1 Extensive consultation on the Local Plan Preferred Options was undertaken in order to gather a wide consensus of opinion on the policies put forward.

8.2 Most policies received general support, with the vast majority of objections largely contained to specific sites.

8.3 There were many objections to the release of Green Belt land, most notably to sites at Yew Tree Farm, Burscough and Mill Lane, Up Holland. Much of the opposition to these sites also related to concerns over infrastructure (highways, utilities, services) and the ability of the Council and partner service providers to secure and deliver improvements. Further opposition was received in relation to the proposed residential sites at Chequer Lane, Up Holland and Firswood Road, Skelmersdale.

8.4 There was support for the flexibility of the Local Plan although concerns have been raised in relation to whether developers will just refrain from building on sites so that more attractive Plan B sites will be released.

8.5 As has been repeated through this document, it is not the quantity of objections (or support) received, but the planning arguments within them that can influence planning policies.

8.6 Planning needs to balance the needs of competing interests, needs and demands and choose the most sustainable option for development in relation to the social, economic and environmental future of West Lancashire. The Council's Planning Officers have reviewed every representation received, and through this document have responded to the main issues and recommended those changes that should be made to the Local Plan as a result.

8.7 This report has also outlined those changes required as a result of the NPPF and other new national policy guidance.

What next?

8.8 The Council has acknowledged all representations made to the Local Plan Preferred Options document, and will take any recommendations into the preparation of a final draft of the Local Plan document called the Publication version. This be available for a final round of representation in summer 2012, where the public will once again be able to make representations on the document. The Council will consider all the representations it receives and submit them to the Secretary of State, along with the Local Plan Publication document.

8.9 Once submitted, an independent Government Inspector will test the Local Plan against a series of Tests of Soundness and will examine all representations on the document. If the document is declared to be sound, it can go on to be adopted; otherwise further work may be needed on it.

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