

E-mail published following a request at Planning Committee.

Dear Councillor,

I am aware of an email sent to a large number of Councillors by the Burscough Action Group (BAG) on 19 June. In order to address any concerns this email has raised for you, and to inform decisions and comments Councillors may make over the coming week as the draft Local Plan Publication document works its way through the Committee / Cabinet cycle, officers have prepared a comment on each of the points BAG have raised in their email below.

BAG also attached their Local Plan Preferred Options (LPPO) consultation representation and a further document providing their views on the reassessment of the Green Belt at Yew Tree Farm, Burscough that was passed to officers in May. A response to the first attachment has been made as part of the Feedback Report on the LPPO consultation - I have attached this response for ease. I will address the second attachment in my response to the points raised by BAG on Green Belt in their email below.

Regards,

John Harrison

John Harrison Dip.Env.P. MRTPI
Borough Planner
West Lancashire Borough Council

Tel: 01695 585132

www.westlancls.gov.uk

From: Michelle Blair [mailto:michelleblair@live.co.uk]

Sent: 19 June 2012 12:45

To: Aldridge, Councillor; Ashcroft, Councillor; Bailey, Councillor; Baybutt, Councillor; Bell, Cllr; Blake, Councillor Mrs; Blane, Councillor; Davis, Councillor; Dereli, Councillor; Fowler, Councillor; Furey, Councillor; Griffiths, Councillor; Hennessy, Councillor; Hodson, Councillor; Houlgrave, Councillor; Melling, Councillor; Moran, Councillor; Westley, Councillor D; O'Toole, Councillor; Pye, Councillor; Wilkie, Councillor

Subject: Letter from Burscough Action Group regarding concerns about the proposed development at Yew Tree Farm

19 June 2012

Burscough Action Group

Concerns about the Proposed Development at Yew Tree Farm

Dear Councillor,

In order to develop a comprehensive and successful Local Plan, decisions must be based on robust evidence and relevant consultation, representative of the issues across the population.

Many residents in Burscough object to the proposed development of the greenbelt at Yew Tree Farm not just because it will irrevocably change the character of Burscough but because of concerns about the nature of the consultation and the gaps in the evidence. There are hundreds of letters of objection, over two thousand signatures on an ongoing petition and evidence of the recent local elections to support this claim.

As the organisers of the petition, representing many residents of Burscough, we respectfully request that you consider our concerns in making any decisions related to the development:

- 74 hectares, once released from greenbelt, is a very large, very valuable piece of land. Its development will radically alter the size and shape and character of Burscough. The 500 houses so often quoted can be comfortably accommodated in 16.5 hectares, it is inevitable that once the housing market picks up, considerably more houses will be built.

The site at Yew Tree Farm, Burscough was selected, in part, precisely because it will have less impact on the Green Belt than other options looked at. It is virtually entirely surrounded and enclosed by existing development as a result of the presence of housing on Liverpool Road South and Higgins Lane and the Burscough employment area on Tollgate Road / Ringtail Road, so development of this site would not cause Burscough to sprawl outwards into the wider Green Belt. In terms of the 500 houses proposed on this site in the draft Local Plan, it could fit on approximately 20 ha, but there are also proposals for 10 ha of new employment land and proposals for new infrastructure (e.g. new roads and cycle paths, a new park, new primary school, etc.) on the site. The draft Local Plan also proposes to safeguard at least 30 ha for future development beyond the end of the Plan period (i.e. after 2027) and makes it clear that no development can take place until a key waste water treatment infrastructure constraint is resolved, and this is not expected to be until 2020. Therefore, it is incorrect to say that "once the housing market picks up, considerably more houses will be built" - only what the final Local Plan ultimately allows for in policy will be permissible and as this is currently drafted, this comprises only 500 new houses, 10 ha of employment land and associated infrastructure.

- The proximity of the industrial estate to Burscough has already caused health risks. Narrowing the gap will only exacerbate this issue. Suitable brownfield land on the disused airbase, next to the industrial estate, can be used without bringing the estate closer to Burscough.

No evidence has been provided related to health risks caused by the proximity of the industrial estate and any new development on the site would be planned and designed to ensure that the potential for any such risks in the future as a result of employment uses would be minimised - this would be addressed through the masterplanning of the site and at the detailed design stage. In relation to the disused airfield, while a small proportion of this land is brownfield, it is wholly within the Green Belt and its development would cause the sprawl of Burscough south-westwards, thus affecting the openness of the wider Green Belt to the south-west of Burscough. The land is also mainly in agricultural use.

- The spatial evidence papers used in the plan omit crucial information of surface water flooding in Burscough, yet papers for Ormskirk and Skelmersdale mention problems despite the lower risk in these areas; as outlined in SFRA 2010 and the DG5 Register. PPS25 states that loss of permeable green land to building will exacerbate surface water flooding. The drainage infrastructure in Burscough deals with both surface

water and sewage so sewage in the streets (and houses) is already a problem. United Utilities will improve the capacity of the New Lane Plant and surface water on new developments may be dealt with using attenuation tanks, but the drainage infrastructure will still be flooded during heavy rainfall. Development will not improve this situation and, unless stringent guidelines are in place, it will exacerbate it.

No evidence on surface water flooding has been omitted - the Strategic Flood Risk Assessment (SFRA) is an important part of the evidence base behind the Local Plan and the Level 1 Report for the SFRA clearly recognises the existing surface water drainage problems in Burscough, and this has been factored into deliberations on the Local Plan. New development at Yew Tree Farm will not be allowed to add further surface water or waste water into the existing sewer network in Burscough and, in fact, the measures developers will probably need to put in place to ensure that developments do not add further pressure on the existing sewer network are actually likely improve the overall situation in relation to surface water drainage in Burscough (i.e. there may well be a net benefit for the town as a result of development in relation to surface water drainage).

- The greenbelt study contains mistakes and bias that have filtered through to the Local Plan; Burscough is misrepresented within the study and key evidence is ignored in assessing the land. In a meeting in May 2012, the planners acknowledged that the site visit appraisal may have been inaccurate and offered to run the study again for Yew Tree Farm including the errors and omissions that we have detailed (see attached), we are still waiting for the results. Obviously this will not change the decisions that were already made on faulty evidence.

In a meeting with BAG in May 2012, officers agreed to re-look at some of our assessments in the Green Belt study in light of BAG's consultation submission and subsequently BAG submitted their own reassessment of the Green Belt at Yew Tree Farm which they attached to their email to Councillors on 19 June. Officers are currently undertaking a review of certain assessments in the Green Belt study, but have not yet completed this exercise. However, it should be clarified that the findings of the Green Belt study formed only one part of the evidence which informed the decision to select Yew Tree Farm as one of the preferred locations for Green Belt release. There were many other reasons why Yew Tree Farm was a more suitable location for Green Belt release than others looked at, and even on Green Belt reasons alone, it is clear that Yew Tree Farm is less "valuable" in Green Belt terms than other options considered. This is because it is enclosed by existing development and would amend the Green Belt to a new, strong boundary which would strongly discourage future development to the south-west of Burscough.

- The traffic study is incomprehensible with virtually no detail,
- il, there is no robust evidence in the study to support the conclusions made in the plan. Burscough suffers from severe congestion at peak times and holidays constrained by narrow roads and bridges. Any increase in traffic flow will have a negative effect in Ormskirk on the A59 and through Newburgh and Parbold on the A5209 to the M58 and the M6.

The Transport Technical Paper (January 2012) which summarises all the evidence behind the Local Plan relating to traffic, highways and public transport is, by nature, a technical

document in a discipline which is notoriously complex and so we recognise that it is not an easy read. However, the findings provided in this Technical Paper have arisen out of assessment work undertaken by experienced consultants and the Highways Authority (Lancashire County Council) . The evidence recognises that new development will naturally put pressure on the highway network wherever it is located, but clearly identifies that the pressure created on the highway network in Burscough is less than would be created by alternative options that were considered elsewhere in the Borough, and that improvements can be made to the highway network in Burscough to alleviate some of these pressures.

- Despite the Habitat Regulations Assessment (HRA) study, the plan gives no consideration to the loss of Yew Tree Farm site as a wildlife habitat. Protected species that benefit from the land include: brown hares, partridges, swallows, sky larks, pink-footed geese, whooper swans, bats and barn owls, some of these species contribute to the success of Martin Mere.

The HRA for the draft Publication Local Plan document currently working its way through the Committee / Cabinet cycle identifies no potential impacts on protected species that cannot be mitigated for or addressed through development proposals. This HRA report is appended to the Publication Local Plan item for Committees / Cabinet.

- The plan doesn't define 'affordable' housing. It avoids putting affordable housing where it is needed. The need is four times as great in Ormskirk and Aughton than in Burscough. In reality there is relatively low local demand for housing in Burscough, that could be met by small developments. House building in a more rural area such as Burscough is more to do with developer's profit than meeting a genuine need.

The Local Plan does not need to define affordable housing - there is a nationally accepted definition which the Local Plan would adhere to. The Local Plan attempts to meet affordable housing need across the Borough but there is a wider housing need which must also be addressed. The housing provided through the Local Plan will meet this wider housing need, as well as affordable housing need as best as possible. Developer's profit does not come into the planning considerations that the Council must address when allocating land for housing development.

- The public consultations during summer 2011 and spring 2012 were a sham. The removal of the Ormskirk option in January 2011 and the lack of detail for the dispersal option, ensured that the only 'real' option was Yew Tree Farm. Hence when Yew Tree Farm received the most objections in the first consultation, WLBC ignored this feedback and increased the housing allocation at the site.

All the Council's consultations on the Local Plan (and before this the Core Strategy) have gone above and beyond that required by national legislation and our own Statement of Community Involvement, as well as beyond what many other authorities do in relation to consultation. The option for an Ormskirk Strategic Development Site was consulted upon as a non-preferred option, alongside two preferred options, in May / June 2011 and received a large number of objections. The housing allocation on the Yew Tree Farm site was actually reduced following the consultation in May / June 2011. No feedback received via consultation has been ignored. However, based on the available evidence, the Council may not always

agree with some of the feedback received, and so may not always make the changes some respondents would like to see.

It is clear from the Local Plan that there is an underlying intention to develop Burscough into a much larger settlement which will effectively form a suburb of Ormskirk. This will irrevocably change the character of Burscough and has inevitably upset many of the residents. Efforts by WLBC to trivialise the reaction has only strengthened our resolve. We hope that by talking to elected councillors rather than a faceless council we will gain some level of recognition and support.

There is no intention to make Burscough a suburb of Ormskirk - the Local Plan will reinforce the strategic gap between the two settlements and their identity as separate settlements. However, Burscough is one of only three Key Service Centres in the Borough and so it is correct and sustainable that it should be a focus for new development alongside Skelmersdale and Ormskirk.

Your attendance at any of our group meetings to discuss this further would be very welcome.

Best Regards

Michelle Blair
on behalf of Burscough Action Group
<http://www.fullstopltd.co.uk/BAG/>

Response to Local Plan Preferred Options Representations 920, 1070 and 1071 submitted by Michelle Blair, Ms Gillian Bjork and Gavin Rattray

General Comments

Brownfield sites – the Local Plan does not allocate all potential housing sites within the Borough because, the way policy is written (SP1, GN1 and RS1), it is made clear that the principle of residential development on sites within the settlement boundaries (especially brownfield sites) is permitted, subject to the specific requirements of other policies in the Local Plan. In preparing the Local Plan, the Council have used the SHLAA as the basis for available and suitable land for development and in order to meet the housing target set for the Borough it is clear that the all the available and suitable sites within the settlement boundaries will be required as well as a small amount of Green Belt land.

Empty houses – It is not appropriate to count empty homes toward the delivery of housing development targets. It should also be noted that vacancy levels in West Lancashire are in the nationally accepted normal range (3-4%) required for the housing market to function efficiently.

“Small-scale” infill of Green Belt – when considering the options for the release of Green Belt in the Local Plan, the Council based their decision on two key factors: firstly, the quality of the Green Belt and the impact removing the Green Belt designation would have and, secondly, the sustainability and deliverability of development in any given location.

In relation to the first factor, the Green Belt Study identified only 14 parcels of land that no longer fulfilled at least one of the purposes of the Green Belt. Of these 14, only 10 parcels were in sustainable locations and deliverable, 5 of which together form the Yew Tree Farm site. The remaining 5 have all been included in the Local Plan either as a preferred development site or a “Plan B” site.

While the quality of the Green Belt is not the only factor, consideration must be given to how changing the Green Belt boundary would impact the remaining Green Belt nearby. When a Green Belt boundary is changed the boundary must be set having regard to the intended permanence of the new boundary so that it may endure beyond the plan period. This can be challenging in rural areas characterised by large fields, often only separated by weak boundaries, and can mean a Green Belt boundary is moved further than is actually required. This is especially the case when considering only “small-scale” infill.

In addition, spreading development around several Green Belt sites has the effect of diluting the development funding for new infrastructure, as well as impacting on more areas of Green Belt. In a rural area such as West Lancs, where infrastructure can often need upgrading to service new development, a critical mass of development is required to make the development viable. “Small-scale” infill would not generate this critical mass in any one location and instead cause infrastructure problems in several locations.

Affordable housing – Policy RS2 expressly requires that a set percentage of properties in a development must be affordable. The only reason that the Council would allow a specific development to move away from this requirement is on the grounds of financial viability, but this would only rarely affect a development proposal and, even then, it is unlikely that no affordable housing contribution would be made.

Spare capacity within neighbouring authorities – the Council has worked closely with all its neighbours in preparing the West Lancashire Local Plan and in preparing the Local Plans / LDFs of neighbouring authorities.

At Options stage (September 2009), the Council consulted on an option whereby neighbouring properties took a proportion of West Lancs’ housing target. This option was not only rejected by residents of West Lancs, but was found to be unrealistic given that neighbouring authorities are struggling to find sufficient land to meet their own housing needs.

In addition, any transfer of housing target between Local Authorities should only take place where there is a close relationship between housing markets, and while there is a degree of overlap with housing markets in some neighbouring authorities, West Lancs’ housing markets are broadly consistent with the Borough boundary.

Incomplete and non-impartial evidence – while this issue will be addressed where it is raised in the detailed comments, the Council has great confidence in the thoroughness of the Local Plan evidence base and has no reason to believe that any of the sources of this evidence are anything other than robust and accurate sources

of evidence undertaken by professionals with suitable qualifications and undertaken with impartiality.

1. Surface Water and Fluvial Flooding

The Local Plan Preferred Options (LPPO) acknowledges that there are surface water flooding issues in Burscough and Policy SP3 requires any development to resolve these issues in relation to the Yew Tree Farm site – it states that development should deliver: “*Measures to address the surface water drainage issues on the Yew Tree Farm site and in Burscough generally*”. Ultimately, it is believed that this surface water flooding constraint can be overcome through improvements to the drainage infrastructure and this would be funded by developers.

In addition, any increase in surface water run-off from the development of a greenfield site would not be permitted to be discharged to a public sewer and so the improvements to drainage infrastructure will also address any increased surface water run-off from the Yew Tree Farm site as a result of development.

In relation to fluvial flooding, no part of the Burscough settlement area (as proposed in the LPPO) is affected by Flood Zones 2 or 3, while Ormskirk and Skelmersdale both have small areas of land in Flood Zones 2 and 3 alongside watercourses flowing through the towns. Therefore, while Burscough may be lower lying, the risk of fluvial flooding is still very low and should not act as a constraint to development and the Spatial Evidence Paper is correct to state that “*Burscough does not lie directly in areas of significant fluvial flood risk*”.

2. Waste Water

There are two separate waste water issues described here; one with regard the environmental limits on discharge at the New Lane treatment works and one with regard the capacity of the sewer network running through Burscough to New Lane. Both would need to be addressed prior to, or through, development at Yew Tree Farm and this is clearly set out in the penultimate paragraph of Policy SP3.

In relation to the Green Belt Study, this assessment informed the preparation of the Local Plan, but it did not decide which parcels of land should or should not be removed from the Green Belt or what they should be developed for. Only the Local Plan can do this. Therefore, the Green Belt Study simply found that, along with other parcels, the land at Yew Tree Farm and the land at Parrs Lane (AUG04) does not fulfil the purposes of being included in the Green Belt anymore.

Stage 3 of the Green Belt Study went on to assess the sustainability and deliverability merits of the sites that were found to no longer fulfil the purposes of the Green Belt, simply to inform the consideration of these sites in the Local Plan process, but, again, it cannot make a decision as to whether a site is removed from the Green Belt or how it is developed. Agricultural land quality and waste water infrastructure were just two of the many factors assessed in Stage 3.

3. School Places

Consideration has been given to the impact of new development in Burscough on school places. However, this consideration has to be informed by the Local

Education Authority's views on the matter. The Council has consulted closely with the Local Education Authority on development proposals in the LPPO, and no issue has been raised with regard secondary school places in Burscough or elsewhere in the Borough.

4. Traffic

- a) The Traffic Impact Assessment Tool (TIAT) that has informed the Transport Technical Paper has assessed the impact on the local road network in West Lancashire of **all** the development proposed in the LPPO, as well as the 3 options consulted upon previously for the Core Strategy Preferred Options (CSPO). It does not assess the impact of any one site, as this would be unhelpful as it would take that impact out of the context of the rest of the Local Plan developments.
- b) The data collected from the TIAT was considered in light of several factors, including Traffic Master data, which calculates the average speeds and journey times along a route. This data identifies "evidence of traffic density" as where speeds slow, the same amount of traffic will inevitably become more dense. Therefore, this issue was considered in the assessment work undertaken and the results of this showed a clear issue on the A570 in relation to the Core Strategy Option 1 which was far greater than the impact on the A59 in any of the other options.
- c) The evidence summarised in the Transport Technical Paper clearly acknowledges that there will be more traffic on the roads across the Borough and that, in certain locations, this increase in traffic could potentially have a detrimental impact. However, consideration needs to be given to how severe this impact would be in different locations with different development options and what improvements to the highway network can be made to reduce any negative traffic impact. Ultimately, it is considered that, as well as the potential impact on Burscough being less than other parts of the Borough with other development options, there are improvement measures that can be identified to improve traffic flow through Burscough.
- d) See response to "school places" above.
- e) While the LPPO includes the Ormskirk bypass as an infrastructure improvement that the Council supports and would like to see happen, the fact remains that, at the moment, it would seem funding for the bypass will not be available in the foreseeable future. Therefore, it would be inappropriate to include it as a mitigation measure for any option.

5. Green Belt

- a) The Green Belt Study has been validated by Lancashire County Council, who gave an independent professional view of the study. Their views and validation of the study were an integral part of the development of the study.
- b) Burscough is included alongside Skelmersdale / Up Holland and Ormskirk / Aughton as a large built-up area because these are the three largest settlements and the only Key Service Centres in the Borough. However, even if Burscough had not been considered as a large built-up area for the purposes of the Green

Belt Study, and the parcels on the edge of Burscough had not been assessed against Purpose One, the same parcels would still have been found as not fulfilling the purposes of the Green Belt. Parbold is not considered a Key Service Centre, and so was considered as a rural settlement in the Green Belt Study.

- c) The option of delivering some of West Lancs' housing needs in neighbouring authorities was considered at the Core Strategy Options stage in September 2009. The neighbouring authorities that would be most appropriate for meeting West Lancs' housing needs are struggling to meet their own housing needs on non-Green Belt land, and so this option was not considered viable. It would also be inappropriate to require a neighbouring authority(ies) to meet West Lancs' housing needs in their Green Belt if there are reasonable and sustainable sites in the Green Belt in West Lancs.
- d) Assessing the Green Belt is inevitably a subjective process. National guidance is not so prescriptive as to result in an entirely objective method of assessing Green Belt, and so the interpretation of different purposes and of different boundaries will vary somewhat even between planning professionals. In particular, the character of the Yew Tree Farm site makes it more difficult than most to divide into parcels and indeed, some planning professionals would consider it as one whole parcel due to the strongest boundaries in the area being the roads and built-lines that make up the boundary of the strategic development site. However, it is unlikely that a change to how the site was divided into parcels would have resulted in a different outcome.
- e) Green Belt is a long-term policy instrument, hence why Green Belt boundaries have not been changed in the Ormskirk / Aughton and Burscough area for 25 years even though it was intended that the Green Belt in this area would be reviewed after 20 years at most. However, as pointed out, the development of the disused airfield for industrial units has affected the character of the Green Belt to the south-west of Burscough.

In terms of the purposes of the Green Belt:

- Purpose 1 – The release of Green Belt at Yew Tree Farm would not constitute urban sprawl given that it is already contained on three and a half sides and it would not close the gap between Burscough and the hamlet of New Lane.
- Purpose 2 – The industrial estate and existing housing at Vicarage Gardens are both closer to the hamlet of New Lane than any part of the proposed Strategic Development Site. It will also not close the gap between Ormskirk and Burscough.
- Purpose 3 – PPG2 (and now the NPPF) defines what is a “countryside use” in relation to this purpose and large parts of the Yew Tree Farm site cannot be said to clearly be in such a use at the current time from a visual inspection of the site. The majority of open fields / land offer the opportunity for agriculture to take place, some form of wildlife to exist and recreational uses to occur. However, the study assessed the parcels to examine whether a clear countryside use was occurring. On any of the parcels assessed within the study, not just those within Burscough, the Council were looking for clear signs of agriculture, wildlife existence (such as a designation or visible presence), recreational activities such as stabling, outdoor pursuits or designated paths and parklands and considering whether a parcel contributes to an attractive landscape.

None of the parcels making up the Yew Tree Farm site clearly demonstrated how they fulfilled any such countryside use. Furthermore, through the consultation process on the draft Green Belt Study, no uses were then subsequently brought to the attention of the Council, for example from farmers who may have been occupying the land or local people who may have used the land for recreational purposes.

- Purpose 4 – Burscough is not a historic town in the sense that PPG2 intended it to be meant and it has already been acknowledged by the Council that Burscough has been mislabeled a historic market town in several documents – this is being corrected.

In relation to New Lane, the hamlet is “washed over” by the Green Belt (i.e. it is part of the Green Belt). Purpose Two relates to the merging of two settlements not in the Green Belt. However, even if New Lane could be considered in this way, the release of Green Belt at Yew Tree Farm is further away from New Lane than existing industrial and residential areas that are not in the Green Belt.

- f) The draft Green Belt Study was publicly consulted upon in May / June 2011 and there was ample opportunity for members of the public to have input to the study via this consultation. This consultation raised several instances where inconsistencies in assessment had taken place and the Council were able to rectify these thanks to this input. No-one queried the assessment of parcels BUR08-12, nor the assessment of APB10, at that time. It should also be added that the independent validation by LCC did not query this assessment.

BUR08-12 are a unique situation with regard the Green Belt in West Lancs. Together they constitute a relatively small area that is virtually entirely enclosed by areas of land not in the Green Belt. This means the land contributes very little, if anything, to the openness of the wider Green Belt and the Green Belt Study could just have easily not divided the site into several parcels, but considered it instead as one, single large parcel. Therefore, it is appropriate to consider the parcels collectively as well as individually. Ultimately, the assessments of the many parcels in the Green Belt Study are generally consistent and they have been independently validated and scrutinised via a public consultation.

In assessing Purpose Three, the Green Belt Study can only assess the land as it is at the time of assessment and the descriptions used are accurate for the site at the time of assessment, and are still accurate at the time of the LPPO consultation. However, it should be stressed that, while the condition of the site does not help any case for the site remaining in the Green Belt, the key reason that it no longer fulfils the purposes of the Green Belt is its enclosure. This enclosure influences the character of the site as a whole and, in many ways, discourages “countryside uses”.

- g) As stated above, the draft Green Belt Study has been independently validated and the subject of a public consultation exercise and the descriptions used are accurate for the site at the time of assessment, and are still accurate at the time of the LPPO consultation.
- h) Purpose Four relates to the setting and character of historic towns, not simply any Listed Building. English Heritage’s letter refers to the proposed LPPO Policy SP3, not the Green Belt Study. The fact that there are 3 Listed Buildings adjacent to the site has no bearing on Green Belt policy.

- i) Table 6.4 provides a summary of the assessments of the parcels, drawing out the key issues for deliverability and sustainability. The full assessment is provided in Appendix 3.
- j) Agricultural land classification has not been used as a defining constraint as to whether land should be released from the Green Belt or not. The Green Belt Study, which cannot make the decision to release land from the Green Belt, merely attempts to assess the deliverability issues affecting those parcels found no to fulfil the purposes of the Green Belt using the best available evidence. The evidence referred to in relation to agricultural land classification is all from an impartial and professional source.

However, the Local Plan can make the decision to release Green Belt or not and the LPPO proposes to release not only BUR08-12, but also AUG04 and ORM01, demonstrating that, while agricultural land classification was a consideration, it ultimately does not prevent land from being released from the Green Belt if other factors provide sufficient justification to do so.

6. Loss of amenities, wildlife habitat and heritage

- a) Heritage matters are addressed in Policy EN4 of the LPPO, which would replace Policy EN5 of the current 2006 Replacement Local Plan. Development can occur at Yew Tree Farm and other locations in the Borough without having a detrimental impact on the Listed Buildings in proximity. Mitigation measures would be proposed by an applicant for approval at submission of a planning application or potentially through a masterplan on a site such as Yew Tree Farm. English Heritage's comments have been received separately and Policy SP3 will be amended accordingly.
- b) Where possible, developments should seek to retain mature trees and hedgerows as part of the development proposals but, where this is not possible, Policy EN2 of the LPPO requires replacement of these features.
- c) While the HRA raises concerns about the impact on Martin Mere of development at Yew Tree Farm, it suggests potential mitigation measures and, ultimately, does not rule out development of the site on this basis. The LPPO proposals for Yew Tree Farm do not represent an increase in the size of development at Yew Tree Farm as previously proposed in the options for the Core Strategy.

7. Housing

The Yew Tree Farm development will deliver an element of affordable housing as would be required by Policy RS2, but the choice of Yew Tree Farm as preferred site is not on the basis of its provision of affordable housing. While it would be ideal to place affordable housing precisely where the need is, this is not always possible because of other planning considerations.