



Jacqui Sinnott-Lacey
Chief Operating Officer

52 Derby Street
Ormskirk
West Lancashire
L39 2DF

25 October 2021

**TO: COUNCILLORS I MORAN, Y GAGEN, V CUMMINS, G DOWLING, D EVANS,
J WILKIE, K WILKIE AND A YATES**

Dear Councillor,

A meeting of the **CABINET** will be held in the **COUNCIL CHAMBER, 52 DERBY STREET, ORMSKIRK L39 2DF** on **TUESDAY, 2 NOVEMBER 2021** at **7.00 PM** at which your attendance is requested.

Yours faithfully

A handwritten signature in black ink, appearing to read 'JS', written over a circular stamp or watermark.

Jacqui Sinnott-Lacey
Chief Operating Officer

AGENDA
(Open to the Public)

1. **APOLOGIES**
2. **SPECIAL URGENCY (RULE 16 ACCESS TO INFORMATION PROCEDURE RULES)/URGENT BUSINESS**

If, by virtue of the date by which a decision must be taken, it has not been possible to follow Rule 15 (i.e. a matter which is likely to be the subject of a key decision has not been included on the Forward Plan) then the decision may still be taken if:

- a) The Chief Operating Officer, on behalf of the Leader, obtains the agreement of the Chairman of the Executive Overview and Scrutiny Committee that the making of the decision cannot be reasonably deferred,

- b) The Chief Operating Officer, on behalf of the Leader, makes available on the Council's website and at the offices of the Council, a notice setting out the reasons that the decision is urgent and cannot reasonably be deferred.

3.	PUBLIC SPEAKING	423 - 428
	Residents of West Lancashire, on giving notice, may address the meeting to make representations on any item on the agenda except where the public and press are to be excluded during consideration of the item. The deadline for submissions is 10.00am Friday 29 October 2021.	
4.	DECLARATIONS OF INTEREST	429 - 430
	If a member requires advice on Declarations of Interest, he/she is advised to contact the Legal & Democratic Services Manager in advance of the meeting. (For the assistance of members a checklist for use in considering their position on any particular item is included at the end of this agenda sheet.)	
5.	MINUTES	431 - 436
	To receive as a correct record, the minutes of the meeting of Cabinet held on 14 September 2021.	
6.	MATTERS REQUIRING DECISIONS	
6a	Tenancy Strategy 2022-2025 (Relevant Portfolio Holder: Councillor Jenny Wilkie)	437 - 478
6b	HRA Revenue & Capital Mid-Year Review (Relevant Portfolio Holder: Councillor J Wilkie)	479 - 488
6c	Capital Programme Mid Year Review (Relevant Portfolio Holder: Councillor Adam Yates)	489 - 502
6d	Customer Feedback Policy (Relevant Portfolio Holder: Councillor A Yates)	503 - 526
6e	Data Quality Policy (Relevant Portfolio Holder: Councillor A Yates)	527 - 538
6f	Corporate Peer Challenge (Relevant Portfolio Holder: Councillors I Moran & A Yates)	539 - 546
6g	Food Insecurity (Relevant Portfolio Holder: Councillor Gareth Dowling)	547 - 594
6h	Minimum Energy Efficiency Standard Enforcement Policy (Relevant Portfolio Holder: Councillor G Dowling)	595 - 620
6i	Private Rented Sector Electrical Safety Policy 2021 (Relevant Portfolio Holder: Councillor G Dowling)	621 - 640

6j	Local Plan Regulation 18 (Scope, Issues & Options) Consultation (Relevant Portfolio Holder: Councillor Gaynar Owen)	641 - 1264
6k	Greater Manchester Combined Authority 'Places for Everyone' Statement of Common Ground (Relevant Portfolio Holder: Councillor Gaynar Owen)	1265 - 1338
6l	Infrastructure Funding Statement 2021 (Relevant Portfolio Holder: Councillor Gaynar Owen)	1339 - 1392
6m	A Regeneration Plan for Skelmersdale Town Centre (Relevant Portfolio Holder: Ian Moran)	1393 - 1396

7. EXCLUSION OF PRESS AND PUBLIC

It is recommended that members of the press and public be excluded from the meeting during consideration of the following items of business in accordance with Section 100A(4) of the Local Government Act 1972 on the grounds that they involve the likely disclosure of exempt information as defined in paragraph 3 (financial/business affairs) of Part 1 of Schedule 12A to the Act and as, in all the circumstances of the case the public interest in maintaining the exemption under Schedule 12A outweighs the public interest in disclosing the information.

(Note: No representations have been received about why the meeting should be open to the public during consideration of the following items of business).

PART 2 - NOT OPEN TO THE PUBLIC

8. MATTERS REQUIRING DECISIONS

8a	Leisure Procurement Strategy Review (Relevant Portfolio Holder: Councillor Y Gagen)	1397 - 1420
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We can provide this document, upon request, on audiotape, in large print, in Braille and in other languages.

FIRE EVACUATION PROCEDURE: Please see attached sheet.

MOBILE PHONES: These should be switched off or to 'silent' at all meetings.

For further information, please contact:
Jacky Denning on 01695 585384
Or email jacky.denning@westlancs.gov.uk

**FIRE EVACUATION PROCEDURE FOR:
COUNCIL MEETINGS WHERE OFFICERS ARE PRESENT
(52 DERBY STREET, ORMSKIRK)**

PERSON IN CHARGE: Most Senior Officer Present
ZONE WARDEN: Member Services Officer / Lawyer
DOOR WARDEN(S) Usher / Caretaker

IF YOU DISCOVER A FIRE

1. Operate the nearest **FIRE CALL POINT** by breaking the glass.
2. Attack the fire with the extinguishers provided only if you have been trained and it is safe to do so. **Do not** take risks.

ON HEARING THE FIRE ALARM

1. Leave the building via the **NEAREST SAFE EXIT**. **Do not stop** to collect personal belongings.
2. Proceed to the **ASSEMBLY POINT** on the car park and report your presence to the **PERSON IN CHARGE**.
3. **Do NOT** return to the premises until authorised to do so by the **PERSON IN CHARGE**.

NOTES:

Officers are required to direct all visitors regarding these procedures i.e. exit routes and place of assembly.

The only persons not required to report to the Assembly Point are the Door Wardens.

CHECKLIST FOR PERSON IN CHARGE

1. Advise other interested parties present that you are the person in charge in the event of an evacuation.
2. Make yourself familiar with the location of the fire escape routes and inform any interested parties of the escape routes.
3. Make yourself familiar with the location of the assembly point and inform any interested parties of that location.
4. Make yourself familiar with the location of the fire alarm and detection control panel.
5. Ensure that the zone warden and door wardens are aware of their roles and responsibilities.
6. Arrange for a register of attendance to be completed (if considered appropriate / practicable).

IN THE EVENT OF A FIRE, OR THE FIRE ALARM BEING SOUNDED

1. Ensure that the room in which the meeting is being held is cleared of all persons.
2. Evacuate via the nearest safe Fire Exit and proceed to the **ASSEMBLY POINT** in the car park.
3. Delegate a person at the **ASSEMBLY POINT** who will proceed to **HOME CARE LINK** in order to ensure that a back-up call is made to the **FIRE BRIGADE**.
4. Delegate another person to ensure that **DOOR WARDENS** have been posted outside the relevant Fire Exit Doors.

5. Ensure that the **ZONE WARDEN** has reported to you on the results of his checks, **i.e.** that the rooms in use have been cleared of all persons.
6. If an Attendance Register has been taken, take a **ROLL CALL**.
7. Report the results of these checks to the Fire and Rescue Service on arrival and inform them of the location of the **FIRE ALARM CONTROL PANEL**.
8. Authorise return to the building only when it is cleared to do so by the **FIRE AND RESCUE SERVICE OFFICER IN CHARGE**. Inform the **DOOR WARDENS** to allow re-entry to the building.

NOTE:

The Fire Alarm system will automatically call the Fire Brigade. The purpose of the 999 back-up call is to meet a requirement of the Fire Precautions Act to supplement the automatic call.

CHECKLIST FOR ZONE WARDEN

1. Carry out a physical check of the rooms being used for the meeting, including adjacent toilets, kitchen.
2. Ensure that **ALL PERSONS**, both officers and members of the public are made aware of the **FIRE ALERT**.
3. Ensure that **ALL PERSONS** evacuate **IMMEDIATELY**, in accordance with the **FIRE EVACUATION PROCEDURE**.
4. Proceed to the **ASSEMBLY POINT** and report to the **PERSON IN CHARGE** that the rooms within your control have been cleared.
5. Assist the **PERSON IN CHARGE** to discharge their duties.

It is desirable that the **ZONE WARDEN** should be an **OFFICER** who is normally based in this building and is familiar with the layout of the rooms to be checked.

INSTRUCTIONS FOR DOOR WARDENS

1. Stand outside the **FIRE EXIT DOOR(S)**
2. Keep the **FIRE EXIT DOOR SHUT**.
3. Ensure that **NO PERSON**, whether staff or public enters the building until **YOU** are told by the **PERSON IN CHARGE** that it is safe to do so.
4. If anyone attempts to enter the premises, report this to the **PERSON IN CHARGE**.
5. Do not leave the door **UNATTENDED**.

PUBLIC SPEAKING – PROTOCOL

(For meetings of Cabinet, Overview & Scrutiny Committees, Audit & Governance Committee and Standards Committee)

1.0 Public Speaking

- 1.1 Residents of West Lancashire may, on giving notice, address any of the above meetings to make representations on any item on the agenda for those meetings, except where the public and press are to be excluded from the meeting during consideration of the item.
- 1.2 A Parish Council Representative may, on giving notice, address any of the above meetings to make representations on any item on the agenda for those meetings, except where the public and press are to be excluded from the meeting during consideration of the item.
- 1.3 The form attached as an Appendix to this Protocol should be used for submitting requests.

2.0 Deadline for submission

- 2.1 The prescribed form should be received by Member Services by 10.00 am on the Friday of the week preceding the meeting. This can be submitted by e-mail to member.services@westlancs.gov.uk or by sending to:

Member Services
West Lancashire Borough Council
52 Derby Street
Ormskirk
West Lancashire
L39 2DF

- 2.2 Completed forms will be collated by Member Services and circulated via e-mail to relevant Members and officers and published on the Council website via Modgov. Only the name of the speaker (and representative) and details of the issue to be raised will be published.
- 2.3 Groups of persons with similar views should elect a spokesperson to speak on their behalf to avoid undue repetition of similar points. Spokespersons should identify in writing on whose behalf they are speaking.

3.0 Scope

- 3.1 Any matters raised must be relevant to an item on the agenda for the meeting.
- 3.2 The Legal & Democratic Services Manager may reject a submission if it:
 - (i) is defamatory, frivolous or offensive;
 - (ii) is substantially the same as representations which have already been submitted at a previous meeting; or

- (iii) discloses or requires the disclosure of confidential or exempt information.

4.0 Number of items

- 4.1 A maximum of one form per resident will be accepted for each Agenda Item.
- 4.2 There will be a maximum of 10 speakers per meeting. Where there are more than 10 forms submitted by residents, the Legal & Democratic Services Manager will prioritise the list of those allowed to speak. This will be considered having regard to all relevant matters including:
 - a. The order in which forms were received.
 - b. If one resident has asked to speak on a number of items, priority will be given to other residents who also wish to speak
 - c. Whether a request has been submitted in relation to the same issue.

No amendments will be made to the list of speakers once it has been compiled (regardless of withdrawal of a request to speak).

- 4.3 All submissions received will be published on the Council's website and circulated to Members of the relevant body and officers for consideration.

5.0 At the Meeting

- 5.1 Speakers will be shown to their seats. At the commencement of consideration of each agenda item the Leader/Chairman will invite the speakers to make their representations. Speakers will have up to 3 minutes to address the meeting. The address must reflect the issue included on the prescribed form submitted in advance.
- 5.2 Members may discuss what the speaker/s have said, along with any other information/representations submitted under this protocol, when all speakers on that item have finished and will then make a decision. Speakers should not circulate any supporting documentation at the meeting and should not enter into a debate with Councillors.
- 5.4 If residents feel nervous or uncomfortable speaking in public, then they can ask someone else to do it for them, including a Parish or Borough Councillor representative. They can also bring an interpreter if they need one. They should be aware there may be others speaking as well.

(Note: If a Resident wishes to have their Borough Councillor speak on their behalf, the Borough Councillor is not a member of the body considering the item.)

5.5 Speakers may leave the meeting at any time, taking care not to disturb the meeting.

(Please see attached form.)



REQUEST FOR PUBLIC SPEAKING AT MEETINGS

MEETING & DATE

NAME

ADDRESS

Post Code

PHONE

Email

Please indicate if you will be in attendance at the meeting

YES/NO*

*delete as applicable

Please indicate if someone will be speaking on your behalf at the meeting

YES/NO*

*delete as applicable

If someone is speaking on your behalf please provide their contact details:

NAME

PHONE

Email

Note: This page will not be published.

(P.T.O.)

Agenda Item 4

MEMBERS INTERESTS 2012

A Member with a disclosable pecuniary interest in any matter considered at a meeting must disclose the interest to the meeting at which they are present, except where it has been entered on the Register.

A Member with a non pecuniary or pecuniary interest in any business of the Council must disclose the existence and nature of that interest at commencement of consideration or when the interest becomes apparent.

Where sensitive information relating to an interest is not registered in the register, you must indicate that you have an interest, but need not disclose the sensitive information.

Please tick relevant boxes

Notes

	General		Notes
1.	I have a disclosable pecuniary interest.	<input type="checkbox"/>	<i>You cannot speak or vote and must withdraw unless you have also ticked 5 below</i>
2.	I have a non-pecuniary interest.	<input type="checkbox"/>	<i>You may speak and vote</i>
3.	I have a pecuniary interest because it affects my financial position or the financial position of a connected person or, a body described in 10.1(1)(i) and (ii) and the interest is one which a member of the public with knowledge of the relevant facts, would reasonably regard as so significant that it is likely to prejudice my judgement of the public interest or it relates to the determining of any approval consent, licence, permission or registration in relation to me or a connected person or, a body described in 10.1(1)(i) and (ii) and the interest is one which a member of the public with knowledge of the relevant facts, would reasonably regard as so significant that it is likely to prejudice my judgement of the public interest	<input type="checkbox"/> <input type="checkbox"/>	<i>You cannot speak or vote and must withdraw unless you have also ticked 5 or 6 below</i> <i>You cannot speak or vote and must withdraw unless you have also ticked 5 or 6 below</i>
4.	I have a disclosable pecuniary interest (Dispensation 20/09/16) or a pecuniary interest but it relates to the functions of my Council in respect of: (i) Housing where I am a tenant of the Council, and those functions do not relate particularly to my tenancy or lease. (ii) school meals, or school transport and travelling expenses where I am a parent or guardian of a child in full time education, or are a parent governor of a school, and it does not relate particularly to the school which the child attends. (iii) Statutory sick pay where I am in receipt or entitled to receipt of such pay. (iv) An allowance, payment or indemnity given to Members (v) Any ceremonial honour given to Members (vi) Setting Council tax or a precept under the LGFA 1992	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<i>You may speak and vote</i> <i>You may speak and vote</i> <i>You may speak and vote</i> <i>You may speak and vote</i> <i>You may speak and vote</i> <i>You may speak and vote</i>
5.	A Standards Committee dispensation applies (relevant lines in the budget – Dispensation 15/09/20 – 14/09/24)	<input type="checkbox"/>	<i>See the terms of the dispensation</i>
6.	I have a pecuniary interest in the business but I can attend to make representations, answer questions or give evidence as the public are also allowed to attend the meeting for the same purpose	<input type="checkbox"/>	<i>You may speak but must leave the room once you have finished and cannot vote</i>

'disclosable pecuniary interest' (DPI) means an interest of a description specified below which is your interest, your spouse's or civil partner's or the interest of somebody who you are living with as a husband or wife, or as if you were civil partners and you are aware that that other person has the interest.

Interest

Employment, office, trade, profession or vocation

Sponsorship

Prescribed description

Any employment, office, trade, profession or vocation carried on for profit or gain.

Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by M in carrying out duties as a member, or towards the election expenses of M.

	This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority— (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
Corporate tenancies	Any tenancy where (to M's knowledge)— (a) the landlord is the relevant authority; and (b) the tenant is a body in which the relevant person has a beneficial interest.
Securities	Any beneficial interest in securities of a body where— (a) that body (to M's knowledge) has a place of business or land in the area of the relevant authority; and (b) either— (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

"body in which the relevant person has a beneficial interest" means a firm in which the relevant person is a partner or a body corporate of which the relevant person is a director, or in the securities of which the relevant person has a beneficial interest; "director" includes a member of the committee of management of an industrial and provident society;

"land" excludes an easement, servitude, interest or right in or over land which does not carry with it a right for the relevant person (alone or jointly with another) to occupy the land or to receive income; "M" means a member of a relevant authority;

"member" includes a co-opted member; "relevant authority" means the authority of which M is a member;

"relevant period" means the period of 12 months ending with the day on which M gives notice to the Monitoring Officer of a DPI;

"relevant person" means M or M's spouse or civil partner, a person with whom M is living as husband or wife or a person with whom M is living as if they were civil partners;

"securities" means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

'non pecuniary interest' means interests falling within the following descriptions:

- 10.1(1)(i) Any body of which you are a member or in a position of general control or management and to which you are appointed or nominated by your authority;
- (ii) Any body (a) exercising functions of a public nature; (b) directed to charitable purposes; or (c) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union), of which you are a member or in a position of general control or management;
- (iii) Any easement, servitude, interest or right in or over land which does not carry with it a right for you (alone or jointly with another) to occupy the land or to receive income.
- 10.2(2) A decision in relation to that business might reasonably be regarded as affecting your well-being or financial position or the well-being or financial position of a connected person to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the ward, as the case may be, affected by the decision.

'a connected person' means

- (a) a member of your family or any person with whom you have a close association, or
- (b) any person or body who employs or has appointed such persons, any firm in which they are a partner, or any company of which they are directors;
- (c) any person or body in whom such persons have a beneficial interest in a class of securities exceeding the nominal value of £25,000; or
- (d) any body of a type described in sub-paragraph 10.1(1)(i) or (ii).

'body exercising functions of a public nature' means

Regional and local development agencies, other government agencies, other Councils, public health bodies, council-owned companies exercising public functions, arms length management organisations carrying out housing functions on behalf of your authority, school governing bodies.

A Member with a personal interest who has made an executive decision in relation to that matter must ensure any written statement of that decision records the existence and nature of that interest.

NB Section 21(13) of the LGA 2000 overrides any Code provisions to oblige an executive member to attend an overview and scrutiny meeting to answer questions.

Agenda Item 5

CABINET

HELD: Tuesday, 14 September 2021

Start: 7.00 pm

Finish: 7.15 pm

PRESENT:

Councillors:

Portfolio

Councillor Ian Moran	Leader of the Council and Portfolio Holder for Economic Regeneration
Councillor Yvonne Gagen	Deputy Leader of the Council and Portfolio Holder for Leisure & Human Resources
Councillor Vickie Cummins	Portfolio Holder for Health and Wellbeing
Councillor Gareth Dowling	Portfolio Holder for Communities and Community Safety
Councillor David Evans	Portfolio Holder for Planning
Councillor Adam Yates	Portfolio Holder for Resources & Transformation

In attendance: Councillor Adrian Owens

Officers:

Jacqui Sinnott-Lacey, Chief Operating Officer
Simon Burnett, Head of Wellbeing & Leisure Services
Alan Houghton, Interim Head of Growth & Development
Kay Lovelady, Legal & Democratic Services Manager
Jacky Denning, Democratic Services Manager
Stephen Benge, Principal Planning Officer
Laura Lea, Homelessness and Private Sector Housing Manager
Rebecca Spicer, Insurance and Risk Officer

Prior to the start of the meeting, the Leader advised that Simon Burnett, Head of Leisure & Wellbeing Services, was leaving the authority after 4 years, to take up a new position at Sefton Council. The Leader thanked Simon for his service to the Council and wished him well in his new role. The Portfolio Holder for Leisure presented Simon with a Borough Shield.

25 APOLOGIES

Apologies for absence was received on behalf of Councillor Jenny and Kevin Wilkie.

26 SPECIAL URGENCY (RULE 16 ACCESS TO INFORMATION PROCEDURE RULES)/URGENT BUSINESS

There were no items of special urgency.

27 PUBLIC SPEAKING

There were no items under this heading.

28 **DECLARATIONS OF INTEREST**

There were no declarations of interests.

29 **MINUTES**

RESOLVED: That the minutes of the Extraordinary Cabinet meeting held on Tuesday 20 July 2021 be received as a correct record and signed by the Leader.

30 **MATTERS REQUIRING DECISIONS**

Consideration was given to report relating to the following matters requiring decisions and contained on pages 215 to 422 of the Book of Reports:

31 **CORPORATE RISK REGISTER**

Consideration was given to the report of the Head of Finance, Procurement & Commercial Services, which provided an update on the Council's Risk Management Framework and set out details on the Corporate Risks facing the Council and how they are being managed.

The minute of the Executive Overview & Scrutiny Committee held on 2 September 2021 had been circulated prior to the meeting.

In reaching the decision below, Cabinet considered the details set out in the report before it and the reasons contained therein.

RESOLVED: That the progress made in relation to the management of the risks shown in the Corporate Risk Register, attached at Appendix B to the report, be noted and endorsed.

32 **MOBILE HOME FIT & PROPER PERSON POLICY 2021**

Consideration was given to the report of the Corporate Director of Place & Community, which sought agreement of the Mobile Homes Fit & Proper Person Policy 2021.

The minute of the Executive Overview & Scrutiny Committee held on 2 September 2021 was circulated prior to the meeting.

In reaching the decision below, Cabinet considered the details set out in the report before it and the reasons contained therein.

RESOLVED: A. That the minute of the Executive Overview & Scrutiny Committee held on 2 September 2021 be noted.

- B. That the Mobile Homes Fit & Proper Person Policy 2021, attached at Appendix 1 to the report, be approved.
- C. That the Corporate Director of Place & Community, in consultation with the relevant Portfolio Holder, be authorised to amend the policy considering any legislative or guidance changes.
- D. That the Corporate Director of Place & Community, in consultation with the relevant Portfolio Holder, be authorised to review and change the fees charge or level of financial penalties issued as required.
- E. That the Corporate Director of Place & Community, in consultation with the relevant Portfolio Holder, be authorised to amend the current Private Sector Housing Enforcement Policy, originally approved by Cabinet, to include The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020.

33 S106 MONIES IN BURSCOUGH

Consideration was given to the report of the Corporate Director of Place & Community, which sought approval to the use of Section 106 (S106) monies for improvements to children's play equipment at Mere Avenue, Burscough.

In reaching the decision below, Cabinet considered the details set out in the report before it and the reasons contained therein.

RESOLVED: That the use of £8,070 of S106 monies be approved to enable improvements to be made to children's play equipment at Mere Avenue, Burscough.

34 S106 MONIES IN NORTH MEOLS

Consideration was given to the report of the Corporate Director of Place & Community, which sought approval to the use of Section 106 (S106) monies for improvements to children's play equipment at Schwartzman Drive / Hesketh Avenue, Banks.

In reaching the decision below, Cabinet considered the details set out in the report before it and the reasons contained therein.

RESOLVED: That the use of £31,580 of S106 monies be approved to enable improvements to be made to children's play equipment at Hesketh Avenue, Banks.

35 DRAFT CIL FUNDING PROGRAMME 2022/23

Consideration was given to the report of the Corporate Director of Place & Community, which sought authority to publicly consult on the draft CIL Funding Programme for 2022/23, including options regarding which infrastructure projects might be prioritised to receive CIL funding in 2022/23.

The minute of the Executive Overview & Scrutiny Committee was circulated prior to the meeting.

In reaching the decision below, Cabinet considered the details set out in the report before it and the reasons contained therein.

- RESOLVED:
- A. That the minute of Executive Overview & Scrutiny Committee, held on 2 September 2021, be noted.
 - B. That the public consultation on a Draft CIL funding programme for 2022/23 be approved, and that the shortlist of infrastructure projects identified at paragraph 5.3 and 5.7 of the report be included in that consultation.
 - C. That the public consultation on the spending of Neighbourhood CIL monies in Skelmersdale be approved, and that the shortlist identified at paragraph 5.3 and 5.4 of the report be included in that consultation.
 - D. That public consultation on Neighbourhood CIL monies in Ormskirk be approved, as set out in paragraph 5.16 of the report.

36 TIMETABLE FOR LOCAL PLAN PREPARATION

Consideration was given to the report of the Corporate Director of Place & Community, which provided an updated timetable and Local Development Scheme for the preparation of a new local plan for West Lancashire, in light of the delays caused by the Covid-19 pandemic, changes in staffing in the Growth & Development Service and anticipated changes to what may be required of local plans under the proposals in the recent Planning White Paper.

The minute of Executive Overview & Scrutiny Committee was circulated prior to the meeting.

In reaching the decision below, Cabinet considered the details set out in the report before it and the reasons contained therein.

- RESOLVED: A. That the minute of the Executive Overview & Scrutiny Committee for the meeting held on 2 September 2021 be noted.

- B. That the updated September 2021 Local Development Scheme within Appendix A be approved.

37 **THE PLANNING SERVICE REVIEW - UPDATE**

Consideration was given to the report of the Corporate Director of Place & Community, which outlined the proposed actions and provided an update on progress with implementing the recommendations of the planning services review.

The minutes of the Executive Overview & Scrutiny Committee and the Planning Committee had been circulated prior to the meeting.

In reaching the decision below, Cabinet considered the details set out in the report before it and the reasons contained therein.

- RESOLVED:
- A. That the minutes of the Executive Overview & Scrutiny Committee held on 2 September 2021 and the Planning Committee held on 9 September 2021, be noted.
 - B. That the Summary Level Project Plan, attached at appendix 1 to the report be noted.
 - C. That the costs, outlined at paragraph 8.1 of the report, be agreed to create a new Team Leader post as outlined at paragraph 6.7, to create capacity within the service to deal with demands and assist in taking forward the recommendations.

38 **INDEPENDENT REVIEW OF TAWD VALLEY DEVELOPMENTS LTD**

Consideration was given to the report of the Chief Operating Officer, which sought authority to instruct Local Partnerships to undertake an independent review of Tawd Valley Developments Limited as outlined in the scope set out in paragraph 6.3 of the report.

In reaching the decision below, Cabinet considered the details set out in the report before it and the reasons contained therein

- RESOLVED:
- A. That authority is granted to the Chief Operating Officer, in consultation with the relevant Portfolio Holder, to take all necessary steps to progress the independent review as outlined in the scope detailed in paragraph 6.3 of the report and present their findings to Council at the earliest opportunity.
 - B. That a maximum investment of £10,000 to undertake the review be approved.
 - C. That the Chief Operating Officer be given delegated authority in consultation with the relevant Portfolio Holder to consider any

agreed comments from Executive Overview & Scrutiny Committee.

- D. That Call In is not appropriate for this item as the Report is being submitted to a special meeting of the Executive Overview & Scrutiny Committee on the 23rd September 2021

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Leader



Report of: Corporate Director Place & Community

Relevant Portfolio Holder: Councillor J Wilkie

Contact for further information: Mr J. Mitchell (Ext. 5244)
(Email: Jonathan.mitchell@westlancs.gov.uk)

SUBJECT: TENANCY STRATEGY 2022-2025

Wards affected: Borough wide

1.0 PURPOSE OF THE REPORT

1.1 To seek approval for the publication of the Tenancy Strategy 2022-2025.

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW & SCRUTINY COMMITTEE

2.1 That the Tenancy Strategy 2022 – 2025 be considered and agreed comments be forwarded to Cabinet for consideration.

3.0 RECOMMENDATIONS TO CABINET

3.1 That the agreed comments of the Executive Overview & Scrutiny Committee, set out in Appendix D to the report, be considered.

3.2 That Cabinet approve the Tenancy Strategy 2022 -2025 attached at Appendix A for consultation purposes.

3.3 That the Head of Housing & Regulatory Services, in consultation with the relevant Portfolio Holder, be given delegated authority to make drafting changes arising from any consultation responses received and publish any such revised and final version of the Tenancy Strategy in February 2022.

4.0 BACKGROUND

4.1 The Localism Act 2011 required Councils to publish, by January 2013, a Tenancy Strategy that would inform the development of specific individual tenancy policies for all Registered Providers of Social Housing (RP's) that operate across the administrative area of West Lancashire.

- A tenancy strategy sets out the Councils broad principles that need to be considered for inclusion in those tenancy policies. It should allow freedom for RP's to balance the housing needs of the borough within the context of their own business requirements
 - A tenancy policy is a document prepared and published by RP's which informs existing and prospective tenants (and any other interested party) of a range of matters including those shown in the paragraph below, so that the RP's use of different tenancy types and the housing management approach to each, can be understood.
- 4.2 In terms of content, the Localism Act requires the following matters to be set out in a Tenancy Strategy so that RP's are aware of the Councils position when preparing their own tenancy policies:
- a) the kinds of tenancies they grant,
 - b) the circumstances in which they will grant a tenancy of a particular kind,
 - c) where they grant tenancies for a term certain, the lengths of the terms, and
 - d) the circumstances in which they will grant a further tenancy on the coming to an end of an existing tenancy.
- 4.3 This approach was and remains important, because at the time, legislation allowed for flexible and fixed term tenancies to be introduced as a form of rent tenancy by RP's, including local authority housing providers. The introduction of such tenures was born out of the view that such tenancies enable better use of housing stock, help with social mobility and assist from a general housing management perspective.
- 4.4 RP's tenancy policies, in effect, set out the detail of how the housing provider will introduce, manage and control flexible/fixed tenancies and to which groups of applicant's different tenancies will be granted. Use of flexible/fixed tenancies may facilitate greater freedom in managing tenancies over the longer term, to reflect more appropriately changes to individual circumstances over time, whilst protecting the most vulnerable individuals in need of longer term tenure stability. The Regulator of Social Housing may also require additional matters to be addressed by RP tenancy policies, over and above those set out above.
- 4.5 In 2013 the Council published a Tenancy Strategy as attached at Appendix B as required by the Localism Act and since then, has undertaken desktop reviews to check if the core content remains fit for purpose. This approach is in line with the requirements of the Localism Act that states:
- *"a local housing authority must keep its tenancy strategy under review, and may modify or replace it from time to time"*
- 4.6 The aims of the Tenancy Strategy are to ensure that:
- The council fulfills its legal duties under sections 150 and 151 of the Localism Act 2011;
 - RP's are aware of the Council's approach to the matters contained in the Tenancy Strategy and that these are reflected, wherever possible, in their own tenancy policies;

- The Council and its partners jointly meet local housing needs with the limited resources available in the most efficient and effective way;
- The kinds of tenancies offered and their terms serve the best interests of both the individual household and the landlord;
- A consistent approach is taken towards the use of Flexible / Fixed Tenancies in the borough;
- Tenancy policies are aligned to facilitate tenant mobility to make best use of the affordable housing stock;
- RP's tenancy policies do not have an adverse effect on homelessness;
- RP's create and maintain mixed and sustainable communities;
- RP's provide support to help vulnerable people sustain their tenancies and ensure that tenants abide by the terms of their tenancies, backed by appropriate sanctions when necessary;
- RP's have housing management policies in place that reflect the requirements of Domestic Abuse legislation;
- Affordable housing is affordable to local people

5.0 CURRENT POSITION

5.1 Following a recent desktop review of the 2013 Tenancy Strategy it is now considered appropriate to publish a new Tenancy Strategy, as attached at Appendix A, which sets out a formal operating period, 2022-2025, and brings the strategy up to date from the perspective of reflecting the current operating environment and language terms.

5.2 The core principles of the Council's previous 2013 Tenancy Strategy remain relevant, in that they are centred on good housing management practice. As a consequence, although the new Tenancy Strategy is a wholesale re-write it does not depart from the previous requirements of the 2013 Tenancy Strategy. It does however introduce additional housing management matters broadly summarised below and expands on previous topics to create a more rounded document.

- Tenancy Sustainment
- Tenant Involvement
- Abandoned Properties
- Addressing Social Housing Fraud
- Nomination Rights
- Incidences of Domestic Abuse
- Converting existing Social Rent properties to Affordable Rent
- New Affordable Rent development in West Lancashire
- Local Housing Allowance rate
- Joint Working

5.3 The Localism Act 2011 does not set a prescriptive publishing format. This means the Council can develop the strategy and use a presentation format of its own choosing. The new Tenancy Strategy, uses a different presentation format which is aimed at making the strategy easier to read and reference by increasing the number of sub headings related to housing management matters.

- 5.4 The Tenancy Strategy is written from the council's strategic perspective as the Local Housing Authority, not as a stock-owning landlord of social housing and is aimed at RP's and as such is written for informed readers, such as councillors and housing professionals, and the terms and language reflect this.
- 5.5 The Tenancy Strategy has a particular function and is not intended to cover the whole range of strategic housing and planning issues, which are ordinarily addressed in other strategies and /or plans, such as:
- Overall housing requirements for the borough, which are contained in the Local Plan
 - The need to address a range of housing issues, including affordable housing, which are usually set out in the Housing Strategy
 - Interventions to address homelessness and associated matters contained in the Homelessness Strategy
 - The allocation of council homes as contained in the Allocations Policy
 - The council's internal arrangements for delivering its housing services

6.0 RP'S AND COMPLIANCE REQUIREMENTS

- 6.1 The Tenancy Strategy must be given "due regard" by the RP's when publishing their own tenancy policy.
- 6.2 Clearly a number of RP's within West Lancashire operate across much larger geographical areas than just our Borough. They must therefore balance our Tenancy Strategy along with other Council and Borough tenancy strategies to ensure that they give due regard to all of them and also ensure that they reflect their own business requirements.
- 6.3 The Tenancy Strategy is therefore not a document that requires mandatory compliance by RP's. There is no requirement to compel changes that are inconsistent with our Council Tenancy Strategy as long as the due regard criterion can be evidenced by the RP.
- 6.4 As part of the Council's strategic housing function there will be a light touch level of monitoring of RP tenancy policies to ensure that RP's consider this Council's Tenancy Strategy when they are due to review their own tenancy policies.
- 6.5 Any new tenure policy arrangements only apply to new tenancies arising from the date of publication of any new Tenancy Policy and do not apply to any existing tenancies prior to the publication date.

7.0 NEXT STEPS

- 7.1 A requirement of the Localism Act is that the Council consults with the key stakeholders of the Tenancy Strategy, in this case, RP's with housing stock within the Borough.
- 7.2 Subject to Cabinet approval, a consultation version of the Tenancy Strategy as shown in Appendix A, will be issued to RP's where they will be given a minimum of six weeks in which to review and provide their comments on the Tenancy Strategy. An indicative timetable is below:

15 November 2021	Consultation period opens - issue RPs with Tenancy Strategy (draft)
9 January 2022	Consultation period closes - collate response received
By 28 January 2022	- review comments received - amend Tenancy Strategy if necessary - proof read and publish

7.3 It is intended to review the consultation comments received and amend the Tenancy Strategy by 28 January 2022 in order that a February 2022 publication date is achieved.

7.4 The Tenancy Strategy 2022-2025 will be made available on the Council website and as such will be available for download. It will also be provided on request to any resident.

8.0 SUSTAINABILITY IMPLICATIONS

8.1 Access to and sustaining tenancies are crucial to vibrant and stable communities. The Tenure Strategy seeks to reflect better focussed use of social housing stock in the Borough for those with continuing housing need

9.0 FINANCIAL AND RESOURCE IMPLICATIONS

9.1 There are no financial and resource impacts by virtue of producing an updated Tenancy Strategy.

9.2 Monitoring and review of the Tenancy Strategy will take place using existing resources.

10.0 RISK ASSESSMENT

10.1 There are no risk issues by virtue of the publication of this Tenancy Strategy.

10.2 The publication of the Tenancy Strategy is a statutory requirement arising out of the Localism Act 2011. To not publish an updated Tenancy Strategy when considered necessary risks noncompliance with the requirements of the Act.

11.0 HEALTH AND WELLBEING IMPLICATIONS

11.1 The publication of a Tenancy Strategy is aimed at trying to make best use of existing social housing stock, in the Borough, in a manner that best meets housing need and uses housing management practices which are fair, equitable, transparent and proactive from the perspective of enabling tenants to keep sustain their tenancies and security of tenure wherever possible. It is envisaged that RP's adopting such practices will therefore contribute to positive health and wellbeing implications for their tenants and the communities where their properties are located, provided also, that the quality of housing meets legislative requirements and rent levels are as affordable as possible.

- 11.2 Ultimately any housing provided by a RP often represents, to their tenants, more than just a physical structure providing shelter. The building become a home – where families grow, a place to socialise with friends, space to unwind, space to keep their possessions safe and a place to take refuge from the rest of the world and spend most of their time, perhaps now, more than ever in recent times.

Background Documents

There are no background documents (as defined in Section 100D (5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

There is a significant direct impact on members of the public, employees, elected members and / or stakeholders. Therefore an Equality Impact Assessment is required.

A formal equality impact assessment is attached as an Appendix C to this report, the results of which have been taken into account in the Recommendations contained within this report

Appendices

Appendix A – Second Draft Tenancy Strategy 2022-2025

Appendix B – Tenancy Strategy 2013

Appendix C – Equality Impact Assessment

Appendix D – Minute of Executive Overview & Scrutiny Committee – 21 October 2021
(Cabinet only)

Appendix E – Minute of Landlord Services Committee (Cabinet Working Group) - 27
October 2021 (Cabinet only)



DRAFT

Tenancy Strategy

2022 – 2025

(For use by Registered Providers operating in West Lancashire when determining their Tenancy Policies)

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1.0 INTRODUCTION

- 1.1 Welcome to West Lancashire Borough Council's Tenancy Strategy, which is written from the council's strategic perspective as the Local Housing Authority, not as a stock-owning landlord of social housing.
- 1.2 As part of the Localism Act 2011 the Council is required to publish a Tenancy Strategy that sets out its tenure expectations for the Borough that all Registered Providers (RP's) of social housing, will need to take due regard of, when formulating their individual tenancy policies - sometimes also referred to as, "tenure policies".
- 1.3 The Council first published its Tenancy Strategy in 2013 and since then, has undertaken desktop reviews to check if the core policy requirements were still fit for purpose. This approach is in line with the requirements of the Localism Act that states:
 - *"a local housing authority must keep its tenancy strategy under review, and may modify or replace it from time to time"*
- 1.4 While the core policy requirements of this Tenancy Strategy refresh, remain in line with the strategy published in 2013, it was felt prudent to publish this refreshed Tenancy Strategy, be clear on its operating term and update certain parts of the text to capture any new terms and other changes, to reflect the current operating environment. This Tenancy Strategy will operate for the period 2022-2025 and replaces the Tenancy Strategy of 2013.
- 1.5 Just as was the case in 2013 and subsequent to that date, each RP must in turn produce its own tenancy policy which outlines its approach to letting tenancies, having regard to the local authority's Tenancy Strategy.
- 1.6 Both a consultation version of this Strategy and final version has been circulated to RP's currently operating in the Borough. Additionally, a copy of this Tenancy Strategy will routinely be issued to any new RP who express a desire to acquire and/or develop affordable housing in West Lancashire.

2.0 GOVERNMENT POLICY CONTEXT

- 2.1 It is sometimes helpful to provide a little history to help understand the policy formulation journey. In this instance it is helpful to know that in November 2011 the government published a new national housing strategy, Laying the Foundations. It was aimed at investing in housing for the purposes of social mobility, health and well-being, and to stimulate economic growth.
- 2.2 At that time a new "Affordable Rent" tenure was introduced to help meet these aims. The rent charged were to be set at up to 80% of local market rents. This approach also reflected the constrained public subsidy position at the time whereby the grant rate per unit being made available to RP's reduced, because they were then able to charge a higher rent to service greater private borrowing, with the additional revenue raised to be re-invested in providing new affordable housing. To access Affordable Housing grant RPs were, at the time, required to let the new homes at Affordable Rents levels.
- 2.3 RPs were also permitted to convert existing rent tenure homes (those homes where rent was lower than an Affordable Rent) to the higher Affordable Rent when they were re-let, subject to agreement with the then, Homes and Communities Agency (now Homes England).

- 2.4 At the same time, the government was starting to implement fundamental reforms to the welfare benefits system, including reductions in the Local Housing Allowance (LHA) payable to tenants in the private rented sector, reductions in benefits available to social tenants deemed to be under-occupying their homes, and the introduction of Universal Credit as a single welfare payment for benefit claimants of working age.
- 2.5 Since then, although some grant is now available again for Social Rent as well as Affordable Rent housing, many of the new affordable rented homes being built, will continue to be delivered at Affordable rather than Social Rents. This Council, when developing new affordable housing for rent (whether directly or through its development company), is typically having to charge Affordable Rents on new homes to make development viable.
- 2.6 The Localism Act 2011 also introduced new flexibilities to enable RPs to offer fixed / flexible term rather than lifetime tenancies. These must be for a minimum of five years, or exceptionally a minimum of two years.

3.0 AIM OF THE STRATEGY

3.1 The Council will work collaboratively with RP's in the Borough to ensure that collectively we are meeting our obligations in that a) the Council produce a Tenancy Strategy (as required by the Localism Act) and b) in the case of RP's, Tenancy Policies are developed (as required by the Regulator of Social Housing).

3.2 In undertaking the activity at paragraph 3.1 above, the Council will encourage those RP's operating in West Lancashire to shape their tenancy policies to meet the requirements of this Tenancy Strategy and, in overall terms, help make progress in meeting our housing priorities in line with Councils Housing Strategy vision:

- *"The provision of good quality housing, in the right locations which also supports our economic and regeneration priorities, meets people's changing needs and is situated within pleasant, safe and sustainable communities"*

3.3 In summary the aims of the Tenancy Strategy are to ensure that:

- The Council fulfils its legal duties under sections 150 and 151 of the Localism Act 2011;
- RP's are aware of the Council's approach to the matters contained in the tenancy strategy and that these are reflected, wherever possible, in their own tenancy policies;
- The Council and its partners jointly meet local housing needs with the limited resources available in the most efficient and effective way;
- The kinds of tenancies offered and their terms serve the best interests of both the individual household and the landlord;
- A consistent approach is taken towards the use of Flexible / Fixed Tenancies in the Borough;
- Tenancy policies are aligned to facilitate tenant mobility to make best use of the affordable housing stock;
- RP's tenancy policies do not have an adverse effect on homelessness;
- RP's create and maintain mixed and sustainable communities;
- RP's provide support to help vulnerable people sustain their tenancies and ensure that tenants abide by the terms of their tenancies, backed by appropriate sanctions when necessary;

- RP's have housing management policies in place that reflect the requirements of Domestic Abuse legislation;
- Affordable housing is affordable to local people

3.4 This Tenure Strategy does not specify detailed changes that will be made by individual providers to their own lettings and assessment policies or to choice based lettings initiatives, but provides a broad framework to deliver local tenancy policies.

3.5 Across the Borough, there will be a continuing need to focus on improving the match between the housing 'offer' and the aspirations of existing and potential new households. The continuing challenge will be to meet these new demands in ways which provide affordable housing options that help to create and maintain mixed and stable communities where people want to live.

4.0 WHAT IS NOT INCLUDED?

4.1 The Tenancy Strategy has a particular function and is not intended to cover the whole range of strategic housing and planning issues, which are ordinarily addressed in other strategies and /or plans, such as:

- Overall housing requirements for the Borough, which are contained in the Local Plan;
- The need to address a range of housing issues, including affordable housing, which are usually set out in the Housing Strategy;
- Interventions to address homelessness and associated matters contained in the Homelessness Strategy;
- The allocation of council homes as contained in the Allocations Policy;
- The Council's internal arrangements for delivering its housing services

5.0 LEGISLATIVE REQUIREMENTS

Tenancy Strategy

5.1 The Localism Act 2011 states that tenancy strategies should set out expectations for landlords in relation to:

- the kinds of tenancies they will grant;
- the circumstances under which they will grant tenancies of a particular type;
- where they grant tenancies for a fixed term, the length of those terms, and;
- the circumstances under which a tenancy may or may not be reissued at the end of the fixed term, in the same property or in a different property

5.2 In developing the tenancy strategy, the local authority is required to provide a copy of the draft to all RP's in the area for comment.

5.3 Whilst all local authorities are required to produce a tenancy strategy, RP's and stock retaining councils will need to produce their own tenancy policy on the type of tenancies they grant. This means that, as a stock retained Council, West Lancashire Borough Council produce both a tenancy strategy and tenancy policy.

5.4 The Council recently updated its Tenancy Policy for 2021 and its content is in harmony with the principles of this Tenancy Strategy.

Tenancy Policy

5.5 In addition to considering the content of this Tenancy Strategy, when producing their tenancy policies, RP's are also expected to consider the Tenancy Standard requirements as published by the Regulator of Social Housing. The Tenancy Standard is intended to help shape their operational policies particularly as it relates to their approach to tenancy management, including interventions to sustain tenancies and prevent unnecessary evictions, and tackling tenancy fraud.

5.6 The following is an extract from the, "tenure" part of the Tenancy Standard. It is listed for completeness to demonstrate the matters to be considered by such a tenancy policy:

- The type of tenancies they will grant;
- Where they grant tenancies for a fixed term, the length of those terms;
- The circumstances in which they will grant tenancies of a particular type;
- Any exceptional circumstances in which they will grant fixed term tenancies for a term of less than five years in general needs housing following any probationary period;
- The circumstances in which they may or may not grant another tenancy on the expiry of the fixed term, in the same property or in a different property;
- The way in which a tenant or prospective tenant may appeal against or complain about the length of fixed term tenancy offered and the type of tenancy offered, and against a decision not to grant another tenancy on the expiry of the fixed term;
- Their policy on taking into account the needs of those households who are vulnerable by reason of age, disability or illness, and households with children, including through the provision of tenancies which provide a reasonable degree of stability;
- The advice and assistance they will give to tenants on finding alternative accommodation in the event that they decide not to grant another tenancy;
- Their policy on granting discretionary succession rights, taking account of the needs of vulnerable household members.

5.7 Additionally, this Council also requires that RP's specifically consider the requirements of the Domestic Abuse Act 2021 and related legislation on how their housing management structures can respond to any matters or concerns arising out of any known or suspected incidences of Domestic Abuse (as defined in the Act itself) being experienced by its tenants and / or their dependents.

6.0 PREVIOUSLY DEVELOPED REGISTERED PROVIDER TENANCY POLICIES

6.1 It is acknowledged that all developing RP's from 2012 onwards, will have already developed tenancy policies as a requirement of their grant agreements with the then Homes and Community Agency (HCA) and subsequently with its replacement body, Homes England (HE).

6.2 It is expected that that upon the stated review date for those tenancy policies that the review process will aim to work to complement this Tenancy Strategy in line with any direction or requirements contained in published guidance from the social housing regulator in respect of developing and publishing tenancy policies and associated items of legislation.

7.0 HOUSING MANAGEMENT, TENANCIES AND BEST USE OF HOUSING STOCK

Tenancy Management

7.1 The Council expects RP's who own or manage stock within the Borough, to provide effective tenancy management services, including:

- Managing all conditions of the tenancy agreement effectively;
- Ensuring that social housing tenants act appropriately and in accordance with their tenant responsibilities;
- Deal effectively with the impacts on local communities of anti-social behaviour, alcohol or drug misuse;
- Tackling tenancy fraud;
- Managing tenancy changes, mutual exchanges and the Right to Buy process;
- Assisting in reducing the risk of homelessness;
- Supporting the development of sustainable neighbourhoods.

Tenancy Sustainment

7.2 It is important that RP's ensure that tenants who are vulnerable or who need additional support to sustain their tenancy, can access appropriate services when required. Such assistance can help to enable tenants to remain in their community and their support networks, reducing the risk of homelessness through loss of tenancy.

Tenant Involvement

7.3 All housing providers in the Borough are encouraged to ensure regulatory requirements are met and to invest in meaningful, inclusive tenant involvement opportunities, which are promoted to their tenants. RP's should use this as an opportunity to continuously improve the quality of services, improve the quality of neighbourhoods and ensure they meet the needs of their tenants.

Local Lettings Policies

7.4 It is recognised that there will be a need for RP's to adopt local lettings policies in certain circumstances /situations in respect of a particular area and that their policies will be developed to reflect this.

7.5 The Council will work with the RP where appropriate in such circumstances.

Making Best Use of Social Housing

7.6 Tenants may at some point need to move, and we support household mobility. This can be for a number of reasons including health reasons, to reduce overcrowding and to make best use of our housing stock by addressing under occupation. We expect the tenancy policies of RP's to embrace this and actively support and encourage mobility.

7.7 Flexible Tenancies offer an opportunity to increase the number of re-lets in social housing stock.

7.8 The Council has developed a 'Tenants Downsizing Scheme', which provides a modest financial incentive and support to assist people living in the Council's social housing to downsize, helping to free up larger properties. We would like to see RP's to adopt similar approach to making best use of their housing stock.

Under Occupation

- 7.9 RP's will be expected to assist the local authority by endeavouring to make best use of their housing stock and, as part of this, to assist those households seeking to move into smaller accommodation following a change in circumstances.
- 7.10 At the same time it is noted that RP's may be restricted by the type of stock owned in an area and such assistance may therefore involve sign-posting to alternative providers or entering into Service level agreements with other providers in the area.

Overcrowding

- 7.11 RP's will be expected to work to alleviate overcrowding in both the way that they allocate accommodation and the way they manage their own housing stock.

Adapted Properties

- 7.12 As part of its requirement to make best use of its housing stock, each RP will want to take account of the way that it allocates and manages tenancies for adapted properties such that the accommodation is primarily used by households requiring the particular features provided.

Abandoned Properties

- 7.13 Where it comes to the attention of an RP that a tenant may have abandoned their property the RP should undertake the necessary investigations in accordance with the RP's abandonment procedure and secure the property as required. Where there is an overdue gas safety check and there is considered to be an immediate health and safety risk to neighbouring residents then it is expected that swift action will be taken by the RP, being mindful of any legal matters, to cap the tenant's gas supply and otherwise make the property safe and secure.

Addressing Social Housing Fraud

- 7.14 Affordable housing is a limited resource, and therefore great importance should be placed on tackling social housing fraud. RP's are actively encouraged to prevent and uncover fraud, and work with the Council and its partners to both address this issue and share good practice.

Nomination Rights

- 7.15 Where the Council and RP have entered in to a Nomination and Data Sharing Agreement which allows for the Council to provide housing nominations to the RP from the Council's housing register, then there is a requirement for the RP to ensure that it complies with the nomination percentages agreed.
- 7.16 All vacancies subject to a Council nomination are required to be advertised through the Council's choice-based lettings (CBL) system to ensure fairness and transparency, subject to those local arrangements being in place - West Lancs Homefinder – www.westlancshomefinder.co.uk
- 7.17 In most cases where a Nomination and Data Sharing Agreement is in operation the nomination percentages are usually based upon:
- 100% nomination rights for first letting
 - No less than 50% nomination rights for subsequent lettings

- 7.18 Any queries about nomination rights and agreements should be directed to Jonathan Mitchell, Housing Strategy & Development Programme Manager. E-mail: jonathan.mitchell@westlancs.gov.uk

Tenancies

- 7.19 Following the introduction of the Housing Act 1985, social housing tenants were offered an Assured or Secure Tenancy, which granted them a home for life. Flexible / fixed term tenancies were introduced as part of the Localism Act 2011 with the aim of helping RP's to make best use of their stock and respond to changing housing needs.
- 7.20 RP's may still offer the types of tenancies they currently use, such as Introductory, Secure and Assured Tenancies: Flexible Tenancies are an additional tool. The Council is keen to ensure that the different types of tenancies are used to support sustainable communities and ensure that vulnerable tenants are provided with the level of stability they need.

Using Introductory Tenancies

- 7.21 The Council recommends that all new tenants should be granted an Introductory Tenancy, sometimes also referred to as probationary or provisional tenancies, for an initial period of 12 months, which can be extended by up to another six months.

Before the start of the Introductory Tenancy, prospective tenants should be told:

- That they do not have the same rights as Secure or Flexible tenants; for example they cannot:
 - Apply for the Right to Buy/ Acquire their home
 - Carry out a mutual exchange with other tenants.
- Whether they will be granted a Secure or Flexible Tenancy at the end of the introductory period.
- The reasons why the landlord may refuse to grant a tenancy at the end of the Introductory Tenancy, such as
 - the property is no longer suitable for the tenant and an alternative affordable home is being offered that is in a location and of a type and size that will be more appropriate for the tenant in the foreseeable future;
 - the tenant's financial circumstances have improved to a level where other forms of tenure could be affordable, such as shared ownership or open market purchase;
 - the conduct of the tenant is such that they would not be accepted onto the council's Housing Needs Register, including rent arrears or other housing debts and their history of addressing these issues;
 - the tenants have breached the terms of their tenancy or have been involved in criminal activity or anti-social behaviour;
 - the tenancy was obtained fraudulently.
- The process for reviewing tenancies and the factors that will be considered.
- The process for appealing against a decision not to grant a further tenancy.

7.22 The Council expects RP's to provide appropriate tenancy support to help vulnerable people to sustain the tenancies, but also expects providers to take robust measures to deal with tenants who commit anti-social behaviour to protect individuals and communities.

Using Flexible Tenancies

7.23 The Council, in its own housing stock, chose to introduce fixed term tenancies in 2013, however following a review, it was decided that with effect from July 2019 fixed term tenancies would no longer be offered, as the Council values the stability that a lifetime tenancy offers to its tenants particularly those in the most vulnerable client groups. With this in mind the Council would expect that use of such tenancies by RP's operating in the Borough are kept to an absolute minimum, but where they are to be used, they are appropriate to the local operating context and would only be introduced to maximise use of RP's housing stock in a manner that will better assist in meeting housing need in the Borough.

7.24 It is acknowledged though that there may be specific estate based factors and / or property types that may also influence the use of flexible / fixed term tenancies. External factors such as welfare reform may also influence the type of tenancy that RP's apply to their housing stock. Where flexible tenancies / fixed term tenancies are to be operated then we would expect the landlords to review the tenant's circumstances at the end of a specified period to identify the most suitable housing option for them. This may include moving to another affordable rented property more suited to their needs, or other options such as shared ownership or home ownership. This approach supports the Council's desire to ensure that best use is made of the limited housing stock in the Borough, whilst taking into account tenants' personal circumstances.

7.25 It is essential that all prospective tenants understand the type of tenancy they are being offered before they are obliged to accept it.

7.26 Where RP's use Flexible Tenancies, the Council expects the following factors should be taken into account:

- Flexible Tenancies should be for a minimum of five years, with consideration given for longer terms in appropriate circumstances;
- Longer Flexible Tenancies should be considered for families with young children, older households and for vulnerable tenants who would benefit from increased stability;
- Shorter tenancies of two years should be used only in exceptional circumstances, for example where accommodation is intended to be short term, or there have been significant previous tenancy breaches, or there are concerns about affordability. This should be clearly explained in any tenancy policies ;
- All prospective tenants should be given clear information before the start of a tenancy, on the tenancy type, the reasons why that tenancy is being offered, and explain the rights and responsibilities specific to the tenancy and the process for reviewing Flexible Tenancies;
- In most cases it is expected that a further Flexible Tenancy will be granted for the same property at the end of the fixed term;
- Decisions to end a Flexible Tenancy by accelerated legal proceedings should be proportionate and clear guidance should be given to tenants on the process, how to access independent advice, and how to secure suitable alternative accommodation.

7.27 In some circumstances a Flexible Tenancy will not be suitable and a lifetime Assured or Secure tenancy is more appropriate, for example:

- Housing designated for older people, or;
- General needs housing where the occupant will be 60+ years of age;
- Housing designated for vulnerable people such as those with learning or physical disabilities, or anyone with any enduring mental health issues. The exception to this will be where the accommodation is designed for move-on to more permanent housing or where specific adaptations may not be required long term.

7.28 This list is not exhaustive and there may be other circumstances where a Flexible Tenancy may not be appropriate.

7.29 It is recognised that RP's will need to take due account of their own circumstances, including loan covenants, asset management considerations and making best use of its stock.

7.30 At the same time it is acknowledged that RP's may wish to retain the use of flexible tenancies in certain circumstances. The RP's should be able to demonstrate the housing management business case for such an approach if required by the Borough Council.

Reviewing Flexible Tenancies

7.31 RP's should explain in their tenancy policies the process for reviewing Flexible Tenancies, detailing the frequency of review and what factors will be considered.

7.32 The council recommends that Flexible Tenancies are reviewed between six and twelve months before the end of the term. The review should establish how the tenant has conducted their tenancy, how the tenant has managed their property, whether the property is still suitable to their needs, and whether the tenant has the means to move to alternative accommodation.

7.33 If the circumstances of the household are broadly similar to those at the time of the original letting, there should be a presumption that Flexible Tenancies will be renewed. Examples of significant changes to a tenant's circumstances include:

- The property is no longer suitable for the tenant and an alternative affordable home is being offered that is in a location and of a type and size that will be more appropriate for the tenant in the foreseeable future;
- The tenant's financial circumstances have improved to a level where other forms of tenure could be affordable, such as shared ownership or open market purchase;
- The conduct of the tenant is such that they would not be accepted onto the Council's Housing Register, including rent arrears or other housing debts and their history of addressing these issues;
- The tenants have breached the terms of their tenancy or have been involved in criminal activity or anti-social behaviour;
- The tenancy was obtained fraudulently

Ending Flexible Tenancies

7.34 Where a tenancy is to be ended without a breach of tenancy, reasonable efforts should be made to offer suitable alternative accommodation, and the Council preference is for

fixed term tenancies to be renewed at the end of the fixed term, other than in exceptional circumstances.

- 7.35 Where a tenancy is to be ended consideration given to extending the tenancy until alternative suitable accommodation can be made available.
- 7.36 The RP should give at least 6 months' notice to a tenant where there is an intention not to renew a tenancy.
- 7.37 The reason for ending the tenancy should be clearly set out and information provided to the tenant on how to appeal. The appeal process should be clearly publicised and be a transparent process.
- 7.38 When ending a tenancy, it is essential that landlords take effective steps to avoid homelessness by working with the Council at the earliest opportunity, so that tenants understand their housing options and organisations act together to relieve homelessness before the tenancy comes to an end. The tenant may obtain free, independent advice by contacting homelessness@westlancs.gov.uk
- 7.39 It would be acceptable to decide not to renew a tenancy in the following circumstances:
- Where the tenant wishes to end the tenancy at that point;
 - In the case of homes with 3 or more bedrooms, where the home is now larger than required by the household;
 - The home contains significant disabled adaptations which are no longer required by that household, and the adapted home would meet the needs of another household on the housing register;
 - In the case of designated move-on accommodation, where the tenant is now able to live independently in more permanent accommodation
- 7.40 The Council would prefer RPs not to base decisions on whether to renew tenancies on grounds of breach of tenancy conditions, until all other tools available have been explored to tackle such issues.
- 7.41 The Council does not want tenants to be disincentivised from bettering their circumstances, and therefore would not be supportive of decisions made not to renew a tenancy on the basis that the tenant had gained work or otherwise improved their financial circumstances.
- 7.42 The Council expects that procedures for bringing tenancies to an end will comply with the Equality Act 2010 and the Human Rights Act 1998.

Mutual Exchanges

- 7.43 The Council recognises that mutual exchanges are an important option available to help tenants to improve their housing situation and for landlords to make more effective use of their housing stock.
- 7.44 The introduction of Affordable Rents and Flexible Tenancies has implications for tenants who wish to exercise their right to mutual exchange. It created a new mechanism for mutual exchanges to protect certain lifetime tenants. If Assured Lifetime and Secure Lifetime tenants who were granted their tenancy before the 1 April 2012 exchange with a Flexible Tenant, then a new Tenancy is issued to each party and the tenant is granted another Secure or Assured tenancy. The Flexible Tenant is granted

a new tenancy, but there is no particular provision regarding its status. It will be a matter for the RP's to decide what type of tenancy to offer.

- 7.45 The Council would encourage RP's to consider granting a degree of security equal to that which is being given up, even if they are not obliged to do so, to ensure that mutual exchanges remain an effective tool.
- 7.46 RP's should ensure that tenants who are mutually exchanging are aware of the implications to their tenancy, including:
- Any changes to their Secure or Assured status;
 - Any change in rent level between Social Rent and Affordable Rent;
 - Any gain or loss of the Right to Buy

Right of Succession

- 7.47 Under the Housing Act 1985, a range of family members were able to succeed to a tenancy on the death of a Secure Tenant, including spouses, partners, civil partners, parents, grandparents, children, grandchildren, aunts, uncles, nephews, nieces and adopted children.
- 7.48 The Localism Act 2011 introduced changes to the succession framework, whereby there can only be one succession, and when one joint tenant dies, this counts as the one succession. Under the Localism Act, Secure Tenancies that started after 1 April 2012 are limited to the succession of the spouse or civil partners as an automatic right.
- 7.49 RP's can make express provision in the tenancy agreement to expand the group of family members that can succeed. It is anticipated though that successions to tenancies will be applied in accordance with legislation and government guidance applicable at the time of the succession application.
- 7.50 Following the death of a tenant, if there is someone living in the home as their principal residence, who is not entitled to succeed, the RP should:
- Provide housing advice and assistance to the person on their options;
 - Consider the interests of vulnerable people and make sure that their policies offer appropriate protection;
 - Where appropriate, offer alternative accommodation that meets the household's needs

8.0 SUPPORTED HOUSING AND SPECIFIC NEEDS ACCOMMODATION

- 8.1 All RP's policies should take into account the needs of vulnerable tenants.

Older People's Accommodation

- 8.2 There are three main types of accommodation provided for older people in the Borough:
- housing specially designated for older people with no support necessarily offered (formally Category 1 Sheltered Housing)
 - housing with support provided on site (formally Category 2 Sheltered Housing)
 - extra care housing

- 8.3 For all older people's housing RP's should consider the nature of the tenants and the reasons they move into such accommodation. It is anticipated that older people's accommodation is likely to benefit from longer / lifetime tenancy approaches, as many older households will be retired and on lower incomes than the general population. It is for these reasons that we would encourage lifetime tenancies to continue in this type of accommodation

Short Term Supported Accommodation

- 8.4 People or families in a short term supported accommodation are likely to have support needs. This type of accommodation is often used for the following client groups - Single Homeless People/Homeless Families with Support needs, people with Mental Health problems, Young People at Risk, Teenage Parents, ex-offenders, people at risk of or fleeing domestic violence and substance misusers.
- 8.5 Households in short term supported schemes receive accommodation based support for a maximum of two years, and therefore usually have a tenancy or a Licence depending on the model of the scheme.

Long Term Supported Accommodation

- 8.6 People in long term supported housing are likely to belong to the following client groups:
- people with Learning Disabilities or Difficulties
 - people with Mental Health Problems
 - people with Physical Disabilities or Sensory Impairments
 - (plus Older People's client groups already covered above)
- 8.7 It is likely that people in these long term client groups will currently have lifetime tenancies which will be necessary for the wellbeing of the tenants due to their particular needs. The use of flexible tenancies would cause unnecessary uncertainty which would not be conducive to the wellbeing of such vulnerable client groups.
- 8.8 The Council would not usually consider Flexible/Fixed term Tenancies to be appropriate to any client groups listed above in this section whether older people, short term or long term accommodation based support unless there were exemptions outlined in the local tenure policy.

Housing for Particular Groups

- 8.9 Housing that is specifically provided for a particular group should be treated the same way as general needs housing in regard to affordable rent and flexible tenancies unless there is a specific additional need which is clearly expressed in the policy.
- 8.10 Households' needs may change in such specific housing, and flexible/fixed tenancies will allow homes to be accessed by the most in need more often than lifetime tenancies.

Incidences of Domestic Abuse

- 8.11 The Secure Tenancies (Victims of Domestic Abuse) Act 2018, states that all Local Authorities and Registered Providers of social housing in England are required, when rehousing an existing Secure Tenant who needs to move or has recently moved from their social home to escape domestic abuse, to grant a Secure Tenancy for their new home.

- 8.12 The Council wants to ensure that survivors of Domestic Abuse will not fear losing security of tenure and to provide families with a stable new home. The impact of this on the turnover of social housing stock should be minimal and should be offset by the subsequent eviction of the perpetrator from the former home, thereby freeing up another affordable property.

Homelessness

- 8.13 Homelessness can occur for many reasons. The Council expects Registered Providers of social housing to ensure that where it is necessary for recovery action to take place for one of their tenancies, they only use such recovery action as a last resort, having first tried all reasonable activity to fully engage with their tenant, including providing advice, assistance and signposting to other agencies who may be able to assist their tenant to resolve the "cause" of the recovery action.
- 8.14 Where the Registered Provider of social housing is aware that homelessness is going to occur as a result of recovery action, then the Councils Homelessness Advice & Prevention Team should be alerted no less than 56 days ahead of the known homeless date. Homelessness prevention advice can be found at Homelessness Advice & Prevention - West Lancashire Borough Council (westlancs.gov.uk) or by emailing homelssness@westlancs.gov.uk
- 8.15 The Council may seek assistance from Registered Providers of social housing in rehousing an applicant who is homeless or threatened with homelessness. In such circumstances, it is expected that Registered Providers of social housing will assist the Council in accordance with existing nomination approaches and in line with duty to co-operate and other related legislative requirements.

9.0 FINANCIAL RELATED MATTERS

Rent Tenures and Affordability

- 9.1 The Council and RP's aim to supply homes for households on lower incomes. Due to the shortage of affordable housing, only those in most need are likely to be granted a Council or RP tenancy. Rents need to be affordable, but also set at a level that enables sufficient investment to maintain the stock to a good standard. Information about new affordable rent developments is discussed at paragraphs 9.9, 9.16 to 9.23 below.
- 9.2 Rents are set under two rent regimes known as Social Rents and Affordable Rents. The Ministry of Housing, Communities & Local Government (MHCLG) produced a "Policy statement on rents for social housing" in February 2019, which sets out the government's policy for setting social housing rents from 1 April 2020 onwards. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/781746/Policy_Statement.pdf
- 9.3 From the 1 April 2020, RP's may not increase Social Rents or Affordable Rents by more than CPI (at September of the previous year) plus 1% in any year for a period of five years.
- 9.4 The Council expects all RP's to comply with the most recent Policy Statement on Rents for Social Housing, the Rent Standard and any subsequent amendments in legislation, regulation or guidance.

Social Rents

- 9.5 Social Rents must be calculated using the formula, the relevant information and annual uplift contained in the Policy Statement on Rents for Social Housing.

Affordable Rents

- 9.6 Affordable Rent will not exceed 80% of gross market rent (including applicable service charges). This means rent levels charged can be up to 80% as opposed to must equal 80%.
- 9.7 Gross market rent is the rent the property would reasonably be expected to be let for in the private sector. Factors including property size, location type and service provision will be taken into account when determining gross market rent.
- 9.8 RP's must comply with the terms of any agreements with Homes England or the Secretary of State when setting Affordable Rents.
- 9.9 RP's should do their best to ensure that Affordable Rent levels do not prohibit or prevent tenants or household members from looking for work by creating a 'benefits trap'. Where Affordable Rents are used, suitability and RP household income/expenditure checks need to be robust to prevent this ahead of allocating an Affordable Rent tenancy.

Converting existing Social Rent properties to Affordable Rent

- 9.10 The Council recognises the importance to RP's business plans of rent levels in their existing stock, and wish to work with them to use existing housing assets to maximise their capacity to develop much needed affordable housing.
- 9.11 The Council would like all RP's who are considering converting Social Rent homes to Affordable Rent to first discuss their proposals with the Council to assess the potential impact locally and for effective monitoring to take place.
- 9.12 In overall terms it is the Council's preferred position that conversions are kept to an absolute minimum in order to maximise the affordability of such housing to prospective tenants.

Service Charges

- 9.13 Service charges are subject to separate legal requirements as set by The Service Charges (Summary of Rights and Obligations and Transitional Provision) (England) Regulations 2007 No.1257 Reg.3), including tenancy agreements.
- 9.14 The cost of service charges can be a challenge in terms of affordability to lower income households. It is expected that RP's will endeavour to keep service charges to a minimum and any increases within the Guideline Limit of CPI plus 1% per annum.

The Council expects that RP's will:

- Set reasonable and transparent service charges that reflect the service provided to tenants;
- Ensure that services and works are of a reasonable standard;
- Supply tenants with clear information on how service charges are set;

- Identify service charges separately from the rent charge;
- Where new or extended services are introduced, and an additional charge may need to be made, the RP will consult with tenants;
- If actual expenditure is less than the current charge, the service charge will be reduced accordingly.

New Affordable Rent development in West Lancashire

- 9.15 Affordable housing is usually developed through:
- a) Planning obligations, whereby a proportion of a market housing site may be required to provide a percentage of dwellings as affordable housing in line with Local Plan requirements;
 - b) 100% affordable housing schemes developed directly or commissioned by RP
- 9.16 In respect of (a) above, the Council will consider delivery of a range of affordable housing tenures including Social and Affordable Rent. In the case of (b) above, and where the affordable housing consists of a rent product, it is most likely going to be in the form of Affordable Rent, simply because the current affordable housing grant programme administered by Homes England, prioritises delivery of Affordable Rent over Social Rent from a grant provision perspective.
- 9.17 Affordable Rent housing is an important tool in helping to create financially viable affordable housing programmes. The Council recognises that RP's must strike a balance when setting rent levels, particularly as there is a need to balance rent levels with providing the best outcome for tenants in relation to affordability, overall tenancy sustainment including avoiding creating a benefit trap and homelessness prevention.
- 9.18 It is recognised that RP's who have entered into grant or strategic partner agreements with Homes England will be aware that where a rental tenure is to be used on a development site, Homes England will expect use of the Affordable Rent tenure (unless, and exceptionally rare, an exception to use Social Rent has been agreed), meaning that ordinarily, Homes England will expect rents to be set at up to 80% of local market rents on new homes for new tenants at the point of letting.
- 9.19 When considering the rent level to charge for an Affordable Rent in a West Lancashire context, this Council requires RP's to fully explore and negotiate robustly with all stakeholders in the development process in order that the final rent charged is as low as possible (less than 80% of market rent), with the principal aim of not exceeding Local Housing Allowance (LHA) rates, wherever possible for the type, size and location of the property being considered. Further information about LHA can be found in paragraphs 9.24
- 9.20 The Council is therefore requiring that those RP's developing new affordable housing in West Lancashire use their best endeavours to limit rent levels to LHA or as close to LHA as possible, including exploring use of any recycled capital and /or any other receipts which would assist in that objective.
- 9.21 The Council is not insisting that rents must be no more than LHA, but does expect RP's to keep Affordable Rents as low as possible, whilst also achieving economically viable and deliverable new affordable housing schemes.
- 9.22 Whilst the provision of quality affordable housing, even at 80% of market rent, is preferable to that of rented housing supplied at higher prices (in the general rental market) and where the properties may not be as thermally efficient and/ or well

managed, improving the affordability (keeping rent as low as possible) is seen as important for the tenant occupying the Affordable Rent property, particularly as household incomes are often variable with employment contracts and working hours being unpredictable at times. In essence, the more manageable the rent, the more chance a household has of weathering the variable nature of employment and or the impact of any limits and help with their rent and council tax, should the households circumstances change to the extent where they become reliant upon Housing Benefit or Universal Credit.

9.23 Therefore when assessing rent to be charged, RP's should have regard to:

- The local housing market context, including the Local Housing Allowance for the Broad Rental Market Area in which the property is located;
- Appropriate steps to mitigate the impact on residents on average or below average earnings

Local Housing Allowance rates

9.24 The Valuation Office Agency Rent Officers determines Local Housing Allowance (LHA) rates used to calculate housing benefit and universal credit for tenants renting from private landlords.

9.25 LHA rates are based on private market rents being paid by tenants in the broad rental market area (BRMA). This is the area within which a person might reasonably be expected to live

- West Lancashire is covered by four broad rental market areas each with their own LHA levels.

9.26 LHA rates are based on rents, and limited by legislation. These rents are being paid by people with the same number of bedrooms as the property where the RP property may be located.

9.27 It is important to be mindful of the LHA rate, particularly when looking to develop new affordable housing for Affordable Rent. While there is no legal requirement for a RP or private landlord to restrict the rent they charge to LHA levels, LHA levels are a benchmark of how much housing benefit or universal credit may be awarded to tenants of private landlords who are reliant on those benefit types to help pay some or all of the rent charged. The LHA is only a starting point in those calculations and may be affected by other matters or restrictions such as:

- A tenant is working
- the benefit cap applies
- other adults live in the house and are expected to contribute

9.28 Only private tenants come under LHA meaning that tenants of a RP property will not be subject to LHA restrictions in respect of their rent. However, if the household become less reliant on housing benefit or universal credit, due to securing work or improving their circumstances generally, then it may become more challenging for them to reach a point where they can afford to pay their full rent or for them to consider other tenure options such as seeking to buy a home.

9.29 Every household's circumstances are different and rent levels form only one aspect of a household's ability to be able to afford their household outgoings, but none the less, the lower the rent, the more affordable for an occupying tenant.

9.30 The following link may be useful, as it enables a post code search, to find out the LHA level for a property in the subject area. By entering the postcode and clicking submit (without filling in any of the other fields), it will also show the relevant LHA bedroom amounts.

- <https://lha-direct.voa.gov.uk/search.aspx>

9.31 West Lancashire LHA rates for 2021/22 are below:

	LHA April 2021				
BRMA	Shared Accommodation	1 Bed	2 Bed	3 Bed	4 Bed +
Wigan	£61.33	£80.55	£103.56	£114.84	£155.34
Central Lancs	£66.50	£90.90	£115.07	£132.33	£182.96
Greater Liverpool	£65.25	£92.05	£108.16	£120.82	£156.00
Southport	£76.50	£94.00	£124.27	£153.04	£189.86

9.32 This link may be used to access current rates during the life of the strategy:

- <https://www.westlancs.gov.uk/bills-benefits/benefits/local-housing-allowance.aspx>

10.0 JOINT WORKING

10.1 The Council considers it has good working relationship with RP's operating in West Lancashire. We are keen to continue to improve these relationships, and we welcome views from RP's on whether there are particular areas where better joint working would be beneficial.

11.0 EQUALITIES

11.1 We are committed to ensure that this Tenancy Strategy does not impact disproportionately on different equality groups. This strategy has been subject to an Equalities Impact Assessment (EIA). We expect all RP's to undertake and publish an EIA of their own tenancy policies.

12.0 MONITORING AND REVIEWING THE TENANCY STRATEGY

12.1 The Council will monitor the impact of this Tenancy Strategy through its strategic housing function on a regular basis raising specific issues with RP's as appropriate and relevant.

12.2 An annual desktop review of this Strategy will be conducted with a further review, no less than six months ahead of the end of its operating of 2025 or sooner if legislative or regulatory changes are such that they fundamentally change the operating principles in which such Tenancy Strategies and Tenure Policies operate.

12.3 Minor changes which do not make a significant difference to service provision will be made to the document by delegated authority to the Head of Housing & Regulatory Services.

13.0 COUNCIL CONTACT

13.1 If you would like to discuss any aspect of this Tenancy Strategy then please contact:

- Jonathan Mitchell
- Housing Strategy & Development Programme Manager
- Tel: 01695-585244
- E-mail: jonathan.mitchell@westlancs.gov.uk

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Tenancy Strategy
2022 – 2025



West Lancashire Borough Council Tenure Strategy

January 2013

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1.0 INTRODUCTION

- 1.1 As part of the Localism Act 2011 the Council is required to publish its strategy for delivering tenure policies that all registered social landlords (RSL's) will need to take due regard of when formulating their individual tenure policies.

2.0 AIM OF THE STRATEGY

- 2.1 The Council will work collectively with RSL's in the Borough to ensure that the changes in the Localism Act enhance our progress in meeting housing priorities.
- 2.2 That RSL tenure policies reflect the needs of the homelessness prevention agenda and choice based lettings arrangements, Housing Registers and allocation policies. These define the process for allocating affordable housing and the development of sustainable and stable communities.
- 2.3 To ensure that across the Borough existing and future affordable housing provision is used in a manner that maximises its use to households in need of such accommodation and is suitable for its local context.

3.0 OBJECTIVES OF THE STRATEGY

- 3.1 The objectives will outline how the Borough Council and RSL's will address the issues of:
- rent and tenure reform
 - homelessness duty and the private sector
 - changes to the housing register and priority for social housing
 - the creation of sustainable and stable communities
- 3.2 This Tenure Strategy does not specify detailed changes that will be made by individual providers to their own lettings and assessment policies or to choice based lettings initiatives, but provides a broad framework to deliver local tenure policies.
- 3.3 Across the Borough, there will be a continuing need to focus on improving the match between the housing 'offer' and the aspirations of existing and potential new households. The challenge will be to meet these new demands in ways which provide affordable housing options that help to create and maintain mixed and stable communities where people want to live.

4.0 LEGISLATIVE REQUIREMENTS

Tenure Strategy

- 4.1 The Localism Act 2011 states that tenure strategies should set out expectations for landlords in relation to:
- the kinds of tenancies they will grant
 - where they grant tenancies for a fixed term, the length of those terms
 - the circumstances under which they will grant tenancies of a particular type

- the circumstances under which a tenancy may or may not be reissued at the end of the fixed term, in the same property or in a different property
- 4.2 In developing the tenancy strategy, the local authority is required to provide a copy of the draft to all RSL's in the area for comment.
- 4.3 Whilst all local authorities are required to produce a tenancy strategy, RSL's and stock retaining councils will need a tenancy policy on the type of tenancies they grant. In developing a tenancy policy for this Borough there must be due regard to this tenure strategy. As a stock retained Council we will need to produce both a tenure strategy and tenure policy. The requirements for the tenancy strategy are set out in the Localism Act, but the requirements of a tenancy policy are outlined in the Directions to the Regulator of Social Housing.

Tenancy Policy

- 4.4 Any tenancy policy must set out if flexible/fixed tenancies are to be offered and take due regard of the Tenure Strategy for the Borough.
- 4.5 RSL's are expected to consider published guidance from the social housing regulator in respect of developing and publishing tenancy policies. [Click here to view the Consultation Draft of the Council Tenure Policy](#) which is going to Council on 17th April 2013.
- 4.6 When using flexible/fixed term tenancies, it is anticipated that the following matters would need to be incorporated in a tenure policy:
- use of starter tenancies, introductory and demoted tenancies
 - the Right to Buy/Right to Acquire and fixed term tenancies
 - succession and fixed term tenancies
 - transfers, mutual exchanges and fixed term tenancies
 - ending a fixed term tenancy
 - appeals and complaints mechanisms
 - the benefits of a sustainable and stable community

National Affordable Housing Programme (NAHP) & Affordable Rent

- 4.7 It is acknowledged that some RSL's have already developed tenancy policies as a requirement of their Homes and Community Agency (HCA) funding 2012 – 2015 to develop affordable rent units.
- 4.8 We expect that upon the stated review date for those tenure policies that the review process will aim to work to complement this Tenure Strategy in line with any direction or requirements contained in published guidance from the social housing regulator in respect of developing and publishing tenancy policies and associated items of legislation.
- 4.9 Providers who have entered into development contracts with the HCA will be able to charge Affordable Rents, which can be set at up to 80% of local market rents on new homes for new tenants at the point of letting.

Definitions of Affordable Housing and Affordability

- 4.10 Essentially affordable housing is housing provided at below market cost, either through renting or by a mixture of renting and buying part of the property; commonly known as shared ownership.
- 4.11 The National Planning Policy framework includes 3 types of affordable housing:
- social rented housing which is owned by local authorities and RSL's for which guideline target rents are determined through the national rent regimes
 - affordable rented housing which are subject to rent controls of no more than 80% of the local market rent (including service charges)
 - intermediate housing, which includes shared ownership, and can include shared equity and equity loans, low cost for sale and intermediate rent

Affordable housing should:

- meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices
- include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision

Affordable Rents

- 4.12 We recognise that providers of affordable housing have already signed contracts with the HCA for the development of new affordable homes. However, there are still a number of points that we ask providers to consider when developing or updating their policies:
- we expect all providers to advertise Affordable Rent properties through the Council's choice-based lettings (CBL) system to ensure fairness and transparency, subject to those local arrangements being in place.
 - we expect conversions from social rented properties to Affordable Rent properties at the point of re-let to be based on the agreed contract with the HCA and that those agreed numbers be consulted upon and shared with the Council in order for effective monitoring to take place
 - we will seek social rent homes on new developments where no HCA grant has been given, in line with our existing tenure split policies, subject to the viability of the scheme in line with local planning policy.
 - we expect all providers to ensure that mechanisms are in place whereby customers understand what an "affordable rent" actually is and the impact on them.

5.0 RSL's AND TENURE POLICIES

RSL's tenancy policy

- 5.1 RSL's are required to publish a tenancy policy as part of the regulatory framework for social housing. It is expected that RSL's will develop such policies, outlining their own strategic and operational approach, by having regard to this Tenure Strategy and will seek local authorities' views as part of a consultation process.
- 5.2 RSL's shall publish clear and accessible policies which outline their approach to tenancy management, including interventions to sustain tenancies, prevent unnecessary evictions. RSL'S tenancy policies are to be widely available including

on the website. Existing secure and assured tenants' succession rights remain unaltered.

Introductory / Starter tenancies

- 5.3 RSL's will still be encouraged to issue these at both social and affordable rent prior to the issuing of a flexible/fixed term tenancy

Flexible tenancies / fixed term tenancies

- 5.4 These terms are used to apply to all tenancies that are offered for a specified period of time, as opposed to lifetime tenancies. These types of tenancy are intended to make the system more flexible and allow more people on the waiting list and in overcrowded conditions to be housed.
- 5.5 The Council would expect that use of such tenancies would be appropriate to the local operating context and would only be introduced to maximise use of RSL's housing stock in a manner that will better assist in meeting housing need in the Borough. It is acknowledged though that there may be specific estate based factors and / or property types that may also influence the use of flexible / fixed term tenancies. External factors such as welfare reform may also influence the type of tenancy that RSL's apply to their stock. Where flexible tenancies / fixed term tenancies are to be operated then we would expect the tenancy policy to outline the criteria in which they will be used.
- 5.6 RSL's policies should outline that they will issue tenancies which are compatible with the purpose of the accommodation, the needs of individual households, the sustainability of the community and the efficient use of the housing stock.
- 5.7 It is recognised that RSL's will need to take due account of their own circumstances, including loan covenants, asset management considerations and making best use of its stock.
- 5.8 At the same time it is acknowledged that RSL's may wish to retain the use of flexible tenancies in certain circumstances. The RSL's should be able to demonstrate the housing management business case for such an approach if required by the Borough Council.
- 5.9 If RSL's are to consider giving flexible/fixed term tenancies the following factors need to be taken into account:
- the fundamental need to build and maintain sustainable and stable communities
 - to ensure the most efficient use of housing stock to meet local housing need
 - to target resources effectively to households in greatest need
 - the minimum term should be 5 years unless the RSL has published an appropriate housing management business case for a shorter tenancy period. As referred to earlier, it is expected that any tenure policy would indicate how such tenancies would be used and so in practice, the tenure policy will provide that "business case" for the approach. This will then enable the Council to understand the operational approach and discuss any concerns it may have with the relevant RSL within the context of the overall strategic housing responsibility of the Council.

Moving house – mutual exchanges

- 5.10 RSL's will be expected to facilitate mutual exchanges within their housing stock in accordance with the provisions of the Localism Act 2011.

Successions

- 5.11 RSL's will be required to comply with the statutory succession rights prescribed in the Localism Act 2011.

Under occupation

- 5.12 RSL's will be expected to assist the local authority by endeavouring to make best use of their housing stock and, as part of this, to assist those households seeking to move into smaller accommodation following a change in circumstances.
- 5.13 At the same time it is noted that RSL's may be restricted by the type of stock owned in an area and such assistance may therefore involve sign-posting to alternative providers or entering into Service level agreements with other providers in the area.

Overcrowding

- 5.14 RSL's will be expected to work to alleviate overcrowding in both the way that they allocate accommodation and the way they manage their own housing stock.

Properties with adaptations

- 5.15 As part of its requirement to make best use of its housing stock, each RSL will want to take account of the way that it allocates and manages tenancies for adapted properties such that the accommodation is primarily used by households requiring the particular features provided.

Advice and assistance at the end of fixed/flexible term tenancy

- 5.16 RSL's should detail in their tenure policy the circumstances in which they may or may not grant another tenancy on the expiry of the fixed term including their approach on taking into account the needs of households who are vulnerable by reason of age, disability or illness and households with children and the need to support sustainable and stable communities.
- 5.17 Where another tenancy is not being offered advice and assistance should be provided to the householder by the RSL to help the tenant find alternative housing at least 6 months prior to the end of the tenancy.
- 5.18 In deciding whether to grant a further tenancy at the end of a fixed term, RSL's should comply with the requirement 'to grant tenancies which are compatible with the purpose of the accommodation, the needs of individual households, the sustainability and stability of the community and the efficient use of their housing stock'.

Local lettings policies

- 5.19 It is recognised that there will be a need for RSL's to adopt local lettings policies in certain circumstances /situations in respect of a particular area and that their policies will be developed to reflect this.

6.0 REVIEW PROCESS

- 6.1 The Council would expect that each RSL's tenancy policy identifies the mechanisms for the review of decisions and that the review process follows any directions issued by the regulator and provides a realistic timescale for the request of a review.
- 6.2 That procedures for review processes are clear and transparent and afford a full opportunity to understand any decisions made by the provider.
- 6.3 Each RSL will structure its own review process in line with relevant guidance, it is anticipated however that the process will:
- include the right to request a review of proposed length of flexible tenancy if the proposed length does not accord with the landlords policy within 21 days of the offer of a flexible tenancy
 - include the right to a review where a landlord proposes to seek recovery and not grant another tenancy
 - ensure that any review request is carried out and decisions notified before the expiry of any notices served
 - provide notification in writing of the outcome and reasons for decisions which are clear and provide a full explanation

7.0 HOUSING OPTIONS

- 7.1 The housing markets need and demand will continue to change across the Borough and it is anticipated that RSL's will work collectively to achieve a range of housing options.
- 7.2 It is expected that for areas where properties are offered as flexible/fixed tenancies that opportunities to provide property for people who are in the lower housing need categories e.g. those working/in employment will be outlined.
- 7.3 It is expected that policies are compliant with affording provision for reasonable preference groups and take account of the Allocation of accommodation: Guidance for local housing authorities in England issued by the Department of Communities and Local Government (DCLG) on the 29th June 2012.
- 7.4 It is anticipated that all tenure forms will be provided through the choice based lettings scheme.

8.0 SUPPORTED HOUSING AND SPECIFIC NEEDS ACCOMMODATION

- 8.1 All RSL's policies should take into account the needs of vulnerable tenants.

Older People's Accommodation

- 8.2 There are two main types of accommodation provided for older people in the Borough:
- housing with support provided on site (formally Category 2 Sheltered Housing)
- Or
- housing specially designated for older people with no support necessarily offered (formally Category 1 Sheltered Housing)
- 8.3 For all older people's housing RSL'S's should consider the nature of the tenants and the reasons they move into such accommodation. It is anticipated that older people's accommodation is likely to benefit from longer / lifetime tenancy approaches, as many older households will be retired and on lower incomes than the general population. It is for these reasons that we would encourage lifetime tenancies to continue in this type of accommodation

Short Term Supported Accommodation

- 8.4 People or families in a short term supported accommodation are likely to have support needs related to what Supporting People defines as socially excluded client groups. Excluded client groups could include Single Homeless People/Homeless Families with Support needs, people with Mental Health problems, Young People at Risk, Teenage Parents, ex offenders, people at risk of or fleeing domestic violence and substance misusers.
- 8.5 Households in short term supported schemes receive accommodation based support for a maximum of two years, and therefore usually have a tenancy or a Licence depending on the model of the scheme.

Long Term Supported Accommodation

- 8.6 People in long term supported housing are likely to belong to the following client groups:
- people with Learning Disabilities or Difficulties
 - people with Mental Health Problems
 - people with Physical Disabilities or Sensory Impairments
 - (plus Older People's client groups already covered above)
- 8.7 It is likely that people in these long term client groups will currently have lifetime which will be necessary for the well being of the tenants due to their particular needs. The use of flexible tenancies would cause unnecessary uncertainty which would not be conducive to the wellbeing of such vulnerable client groups.
- 8.8 The Council would not usually consider Flexible/Fixed term Tenancies to be appropriate to any client groups listed above in this section whether older people, short term or long term accommodation based support unless there were exemptions outlined in the local tenure policy.

Housing for BME, Religious or Cultural Groups

- 8.9 Housing that is specifically provided for a particular BME, religious or cultural group should be treated the same way as general needs housing in regard to affordable rent and flexible tenancies unless there is a specific additional need which is clearly expressed in the policy.

- 8.10 Households' needs may change in such specific housing, and flexible/fixed tenancies will allow homes to be accessed by the most in need more often than lifetime tenancies.

9.0 MONITORING AND REVIEWING THE TENANCY STRATEGY

- 9.1 The Council will monitor the impact of this Tenure Strategy through its strategic housing function on a regular basis raising specific issues with RSL's as appropriate and relevant.
- 9.3 This document will be reviewed in three years time or sooner if legislative or regulatory changes need to be included.

Equality Impact Assessment Form



Directorate: Growth & Development Services	Service: Strategic Planning, Regeneration & Implementation
Completed by: Jonathan Mitchell	Date: 18 August 2021
Subject Title: Tenancy Strategy 2022-25	
1. DESCRIPTION	
Is a policy or strategy being produced or revised:	Yes <i>*delete as appropriate</i>
Is a service being designed, redesigned or cutback:	No
Is a commissioning plan or contract specification being developed:	No
Is a budget being set or funding allocated:	No
Is a programme or project being planned:	No
Are recommendations being presented to senior managers and/or Councillors:	Yes
Does the activity contribute to meeting our duties under the Equality Act 2010 and Public Sector Equality Duty (Eliminating unlawful discrimination/harassment, advancing equality of opportunity, fostering good relations):	Yes
Details of the matter under consideration:	The approval of a Tenancy Strategy for 2022-2025
<p><i>If you answered Yes to any of the above go straight to Section 3</i></p> <p><i>If you answered No to all the above please complete Section 2</i></p>	
2. RELEVANCE	
Does the work being carried out impact on service users, staff or Councillors (stakeholders):	<i>*delete as appropriate</i>
If Yes , provide details of how this impacts on service users, staff or Councillors (stakeholders): <i>If you answered Yes go to Section 3</i>	
If you answered No to both Sections 1 and 2 provide details of why there is no impact on these three groups: <i>You do not need to complete the rest of this form.</i>	
3. EVIDENCE COLLECTION	
Who does the work being carried out impact on, i.e. who is/are the stakeholder(s)?	Council housing department, registered providers of social housing (RP's) with housing stock in the Borough, existing and prospective tenants of the those RP's including those of the

	Council.
If the work being carried out relates to a universal service, who needs or uses it most? (Is there any particular group affected more than others)?	No one particular group is affected more than others.
Which of the protected characteristics are most relevant to the work being carried out? Age Gender Disability Race and Culture Sexual Orientation Religion or Belief Gender Reassignment Marriage and Civil Partnership Pregnancy and Maternity / Paternity	<i>*delete as appropriate</i> Potentially, all by virtue of the fact that the tenancy strategy sets out broad principles to be considered by RP's in allocating tenancies and of different types and lengths. Whilst the allocation of housing is usually based on housing need, the applicants themselves may have one or more of the protected characteristics
4. DATA ANALYSIS	
In relation to the work being carried out, and the service/function in question, who is actually or currently using the service and why?	Tenants of RP's may be impacted by changes introduced by an RP in their tenure policy, although it is usual for existing tenants to be subject to protections, meaning that, any new changes are more than likely going to impact new / prospective tenants from the point any new tenure policy is introduced and/or subject to a tenure policy review by a RP.
What will the impact of the work being carried out be on usage/the stakeholders?	The strategy aims to have a positive impact by encouraging RP's to develop housing management policies as it relates to the types of tenancies they operate that are fair and equitable and reflect the delivery preferences of this Council across a range of matters.
What are people's views about the services? Are some customers more satisfied than others, and if so what are the reasons? Can these be affected by the proposals?	Consultation will take place with stakeholders of the Tenancy Strategy, namely RP's and where appropriate amendments will be made to the strategy.
What sources of data including consultation results have you used to analyse the impact of the work being carried out on users/stakeholders with protected characteristics?	None to date, although we expect consultation responses as indicated above to help shape the strategy further where required. It should be said that the Tenancy Strategy was first published in 2013 and since then there have been a range of changes that this new replacement Tenancy Strategy aims to take account, particularly those related to legislative

	matters, which were not applicable in 2013.
If any further data/consultation is needed and is to be gathered, please specify:	No further information is to be gathered other than that previously mentioned above.
5. IMPACT OF DECISIONS	
In what way will the changes impact on people with particular protected characteristics (either positively or negatively or in terms of disproportionate impact)?	<p>The Tenancy Strategy is a document intended for use and interpretation by Registered Providers of Social Housing. The Strategy itself sets out high level expectations and the preferences of the Council in how registered providers should deliver their tenancies and undertake certain aspects of their housing management in order to ensure that their tenants are being treated fairly and are given the best chance of sustaining their tenancy.</p> <p>Registered providers are not under a legal duty to implement the Councils preferences, merely have, "due regard". This means that the preferences in the Tenancy Strategy may or may not be introduced as each registered provider can decide how they wish to proceed.</p> <p>The intention of the strategy is to have a positive impact upon existing and prospective tenants irrespective of whether they consist of people with particular protected characteristics.</p>
6. CONSIDERING THE IMPACT	
If there is a negative impact what action can be taken to mitigate it? (If it is not possible or desirable to take actions to reduce the impact, explain why this is the case (e.g. legislative or financial drivers etc.).	No negative impacts have been identified.
What actions do you plan to take to address any other issues above?	<p>No actions.</p> <p><i>If no actions are planned state no actions</i></p>
7. MONITORING AND REVIEWING	
When will this assessment be reviewed and who will review it?	It is not proposed to review this particular EIA, although a new EIA will be developed if necessary at the time of the development of a new Tenancy Strategy in the future.



AGENDA ITEM:

**LANDLORD SERVICES
COMMITTEE (CABINET WORKING GROUP):
27 October 2021**

**EXECUTIVE OVERVIEW AND SCRUTINY
COMMITTEE: 21 October 2021**

CABINET: 2 November 2021

COUNCIL: 15 December 2021

Report of: Head of Finance, Procurement and Commercial Services

Relevant Portfolio Holder: Councillor J. Wilkie

**Contact for further information: Peter Quick (Extn. 5203)
(peter.quick@westlancs.gov.uk)**

SUBJECT: HRA REVENUE AND CAPITAL MID-YEAR REVIEW

Wards affected: Borough wide

1.0 PURPOSE OF THE REPORT

1.1 To provide a summary of the Housing Revenue Account (HRA) and Housing capital programme positions for the 2021/22 financial year.

2.0 RECOMMENDATIONS TO LANDLORD SERVICE COMMITTEE

2.1 That the working group note the 2021/22 HRA and Housing capital programme positions and endorse the budget adjustments identified in Appendix 2.

3.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW AND SCRUTINY COMMITTEE

3.1 That the 2021/22 HRA and Housing capital programme positions be noted.

4.0 RECOMMENDATIONS TO CABINET

4.1 That the 2021/22 HRA and Housing capital programme positions be noted.

4.2 That the proposed budget adjustments identified in Appendix 2 be endorsed for consideration by Council.

5.0 RECOMMENDATIONS TO COUNCIL

- 5.1 That the 2021/22 HRA and Housing capital programme positions be noted.
- 5.2 That the proposed budget adjustments identified in Appendix 2 be approved.

6.0 BACKGROUND

- 6.1 In February 2021, Council agreed the HRA revenue and eight year capital budgets for the 2021/22 financial year. Subsequently in July 2021 Council noted the favourable financial outturn position of the 2020/21 HRA and Capital Investment Programme and approved a number of budget changes and allocations.

7.0 HOUSING REVENUE ACCOUNT – PROJECTED OUTTURN

- 7.1 A summary of the projected HRA revenue outturn against budget is set out in Appendix 1 and shows that the HRA is expected to outturn broadly in line with budget, (a small adverse budget variance overall of £118,000 is currently forecast for 2021/22). The final outturn position is likely to be affected by actions taken in regard to paragraph 7.2, below.
- 7.2 Significant budget pressure on response repairs and void revenue repairs is expected, in part due to there being more works completed by Wates outside the standard price per property (ppp) and void per property (vpp) cost than was initially anticipated at the time of procuring the contract. This is being monitored by Property Services and additional control steps are being added in regard to voids costs.
- 7.3 This follows pressure on the response repairs and void revenue repairs budget in 2020/21 as well, the first full year of operation. After further monitoring and controls have been put in place, it may be that additional budget resources will be required in this area to address an ongoing pressure. Alternative outcomes may also seem more appropriate however. This will be picked up in 2022/23 budget setting.
- 7.4 In 2020/21, additional funding was added to the repairs reserve to reflect unsubstantiated Wates contract claims. If required at the end of 2021/22, these reserves are available to address any shortfall not offset elsewhere in the HRA, though a longer-term solution will still be required to ensure that the reserve remains at the required level. The use of reserves is not included in the forecast in Appendix 1.
- 7.5 The budget pressure identified in paragraph 7.2 is expected to be largely offset by the favourable variances below:
 - There are a number of vacant posts pending recruitment and consequently a favourable variance is anticipated on employee costs.
 - Planned revenue works are unlikely to be fully undertaken in year.
 - The remaining budget contingency is not expected to be used.

8.0 CAPITAL INVESTMENT PROGRAMME

- 8.1 As part of the mid-year review, capital programme budgets have been examined to ensure that they continue to be required and that their level is appropriate. Proposed amendments are shown in Appendix 2.
- 8.2 **Appendix 2** identifies budget that is being reprofiled into 2022/23 and being released at this mid-year point to free up funding. For a number of schemes there are plans to deliver additional works currently budgeted in future years, most notably the roofing programme. Rather than move budget and funding at mid-year then amend it again once final outturn is known, budgets will be reprofiled into and from future years at the time of 2021/22 outturn.
- 8.3 A summary of the capital expenditure position at 9 September 2021, against the revised budget is shown in **Appendix 3**. Total expenditure to date on the capital programme is £2.219m which represents 22% of the total revised capital programme budget. It is expected that the major part of the revised capital budget will be spent in year.
- 8.4 All capital programme expenditure to date is funded from revenue contributions, (tenant rents).
- 8.5 As TVDL work continues on delivering additional Council housing stock, the HRA has spent £4.227m to date on phase one, £0.935m of that to date has been funded by grants from Homes England and 141 capital receipts for replacement housing. The balance is expected to be funded from HRA borrowing, though this will be reviewed at year end once the final position is clear.

9.0 SUSTAINABILITY IMPLICATIONS

- 9.1 Careful monitoring the budget position helps ensure that the HRA remains able to deliver services and is financially sustainable in the medium term. This supports the aim that local people should receive good quality homes for a fair and appropriate rent.

10.0 RISK ASSESSMENT

- 10.1 The formal reporting of performance on the Housing Revenue Account is part of the overall budgetary management and control framework that is designed to minimise the financial risks facing the Council. This process is resource intensive for both Members and Officers but ensures that a robust and achievable budget is set.

11.0 HEALTH AND WELLBEING IMPLICATIONS

- 11.1 The health and wellbeing implications arising from this report will be dependent on the particular circumstances for that budget.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

The decision does not have any direct impact on members of the public, employees, elected members and / or stakeholders. Therefore no Equality Impact Assessment is required.

Appendices

Appendix 1 – HRA Revenue Projected Outturn

Appendix 2 – Housing Revised Capital Programme Summary of Changes

Appendix 3 - Housing Capital Year to Date Position

Appendix 4 - Landlord Services Committee (Cabinet Working Group): 27 October 2021
(Cabinet & Council only)

Appendix 5 - Executive Overview and Scrutiny Committee: 21 October 2021(Cabinet & Council only)

Appendix 6 - Cabinet: 2 November 2021 (Council only)

Appendix 1 – HRA Revenue Projected Outturn

Budget Area	Revised Budget £000	Variance £000	Comment
Employee Expenses	3,617	-100	Staffing vacancies will lead to a favourable budget variance
Void repairs and response repairs	3,504	1,000	Both budgets are demand-led so final outturn depends upon various factors. Works outside the standard ppp and vpp prices are significantly more than expected.
Other premises costs	3,314	-200	Planned revenue works budget not expected to be fully used in 2021/22
Transport costs	149	0	
Budget contingency	482	-482	No current calls on remaining budget contingency
Supplies and Services	1,194	-50	
Support Services and internal income (net)	2,927	0	
Loan interest & Contribution towards Repayment	3,407	0	
Contributions to capital	7,600	0	
Dwelling rents	-23,260	-25	
Other external income	-2,934	-25	
Total	0	118	Represents 0.45% of overall turnover

*A technical adjustment has been made to the Support Services and Internal Income (net) budget, to reflect the effect of recharges to and from the HRA. This has no impact on tenants or on the GRA. The budget has been added to budget contingency.

Appendix 2 – Housing Revised Capital Programme Summary of Changes

Scheme	Current Budget £000's	Reprofile from 2020/21 £000's	Reprofile into/from 2021/22 £000's	Funding released £000's	Revised Budget £000's	Comments
Re-Roofing Works	1,105	293			1,398	
External Works	833	437			1,270	
Windows and Doors	448	447			895	
Heating System Upgrades	851				851	
Kitchen Replacements	733				733	
Electrical Upgrades	329	193			522	
Walls	444	43	-400		87	Whitburn pilot on modular brick flats indicated that a better vfm solution was required. Working to identify a more feasible solution so unlikely to be delivered in 2021/22.
Bathroom Replacements	463				463	
Communal Fire Safety Works	101	237			338	
Communal Areas Improvements	133				133	
Capital Investment Programme	5,440	1,650	-400	0	6,690	
Carbon Neutral Dwellings	475	223			698	
Salary costs & Professional Fees	600				600	
Change in Standard for Smoke Detection	300	250			550	
Adaptations for Disabled People	502			-202	300	£300k likely to be adequate in year, sufficient budget in future years, so release excess budget
Environmental Programme	364	2			366	
Contingency/Voids	300				300	
Improvements to Binstores	0	192			192	

Sheltered Housing Upgrades	140				140	
Lifts	35	70			105	
Energy Efficiency	25				25	
Asset Management Assessment	0	17			17	
Other Housing Schemes	2,741	754	0	-202	3,293	
Purchase Service Charge Software	0	40			40	
Digital Initiatives	0	7			7	
Rounding						
Total Capital Programme	8,181	2,451	-400	-202	10,030	
Properties from TVDL	17,009				17,009	Balance of HRA TVDL budget Council Feb 2021, not spent by 31 March 2021
Total Expenditure	25,190	2,451	-400	-202	27,039	

Resources

	Current Budget £000's	Slipped from 2019/20 £000's	Re-profile into 2021/22 £000's	Funding released £000's	Revised Budget £000's	Comments
HRA/MRA Contribution - capital	7,550	419			7,969	Tenant rents to fund capital programme
HRA Borrowing - capital	631	2,032	-400	-202	2,061	HRA borrowing to fund capital programme
HRA Borrowing for TVDL purchases	14,279				14,279	TVDL expenditure from borrowing, after external contributions below
Homes England Grants - TVDL	2,010				2,010	Grants towards cost of TVDL properties
Capital Receipts (141) - TVDL	720				720	Right to buy 141 replacement receipts

						towards cost of TVDL properties
Total Resources	25,190	2,451	-400	-202	27,039	

Appendix 3 – Housing Capital Year to Date Position

Scheme Description	Revised Budget £000's	Mid-year Spend £000's	Mid-year Spend %
Re-Roofing Works	1,398	390	28%
External Works	1,270	474	37%
Windows and Doors	895	212	24%
Heating System Upgrades	851	407	48%
Kitchen Replacements	733		0%
Electrical Upgrades	522	140	27%
Walls	87		0%
Bathroom Replacements	463		0%
Communal Fire Safety Works	338	137	41%
Communal Areas Improvements	133	6	5%
Capital Investment Programme	6,690	1,766	26%
Carbon Neutral Dwellings	698	4	1%
Salary costs & Professional Fees	600	5	1%
Change in Standard for Smoke Detection	550	79	14%
Adaptations for Disabled People	300	99	33%
Environmental Programme	366	41	11%
Contingency/Voids	300	195	65%
Improvements to Binstores	192		0%
Sheltered Housing Upgrades	140	2	1%
Lifts	105		0%
Energy Efficiency	25		0%
Asset Management	17	26	153%

Assessment			
Other Housing Schemes	3,293	451	14%
Purchase Service Charge Software	40	1	3%
Digital Initiatives	7	1	14%
Rounding			
Total Capital Programme	10,030	2,219	22%
Properties from TVD	17,009	4,227	25%
Total Expenditure	27,039	6,446	24%

Resources

Scheme Description	Revised Budget £000's	Mid-year Spend £000's	Mid-year Spend %
HRA/MRA Contribution - capital	7,969	2219	28%
HRA Borrowing - capital	2,286	0	0%
HRA Borrowing for TVDL purchases	14,279	3,292	23%
Homes England Grants - TVDL	2,010	788	39%
Capital Receipts (141) - TVDL	720	147	20%
Total Resources	27,039	6,446	24%

Agenda Item



**EXECUTIVE OVERVIEW &
SCRUTINY COMMITTEE:**
21 October 2021

CABINET: 2 November 2021

COUNCIL: 15 December 2021

Report of: Head of Finance, Procurement and Commercial Services

Contact for further information: Cathy Murphy (Ext. 5057)

(E-mail: Cathy.Murphy@westlancs.gov.uk)

SUBJECT: REVISED CAPITAL PROGRAMME

Wards affected: Borough wide

1.0 PURPOSE OF REPORT

1.1 To agree a Revised General Revenue Account (GRA) Capital Programme for 2021/22 and provide an update on progress on capital schemes.

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW & SCRUTINY COMMITTEE

2.1 That the revised Capital Programme, including the re-profiling, virements and budget adjustments contained within Appendix A, be approved and referred to Cabinet and the Head of Finance, Procurement and Commercial Services in consultation with the relevant Portfolio Holders.

2.2 That progress against the Revised Capital Programme at the mid-year point be noted.

3.0 RECOMMENDATIONS TO CABINET AND COUNCIL

3.1 That the revised Capital Programme, including the re-profiling, virements and budget adjustments contained within Appendix A, be approved.

3.2 That progress against the Revised Capital Programme at the mid-year point be noted.

4.0 BACKGROUND

- 4.1 The Capital Programme is set on a three-year rolling basis and the Programmes for 2021/2022, 2022/2023 and 2023/2024 were approved by Council in February 2021.
- 4.2 In accordance with best practice, the Capital Programme is subject to revision during the year to ensure that it is based on the latest available information and to make monitoring of the Programme more meaningful. It enables Managers to review their schemes with the most up to date information and to review the resources available. It also provides a base upon which to build future Capital Programmes.
- 4.3 Members are kept informed of the financial position of the Capital Programme through monitoring reports. The Housing Public Sector programme is the subject of a separate report elsewhere on the agenda and will be also presented to this Cabinet meeting. This report concentrates on the GRA programme.

5.0 REVISED CAPITAL PROGRAMME

- 5.1 The original budget that was set for the 2021/22 financial year together with underspends brought forward from the previous financial year totals £3.665m.
- 5.2 Heads of Service have reviewed their respective schemes and are now proposing that changes are made as a result of more up to date information that has become available. This review process has incorporated a number of considerations including:
- Re-profiling of schemes to match the anticipated timing of spending.
 - Increasing expenditure budgets to reflect new and / or additional external funding
- 5.3 The proposed changes to the 2021/22 Programme are analysed in Appendix C. This shows a net decrease of £348K largely due to Affordable Housing £247K, Renovation Grants £50K, and Waste management Programme £35k being re-profiled. The revised GRA Capital Programme totals £3.317m for 2021/2022 following these changes.

6.0 CAPITAL EXPENDITURE

- 6.1 Generally, capital schemes are profiled with relatively low spending compared to budget in the early part of the financial year with increased spending as the year progresses. This reflects the fact that many new schemes have considerable lead in times. Other schemes are dependent on external partner funding and can only begin once their funding details have been finalised.

Other related issues include contract retentions or contingencies that will only be spent some time after completion of the contract.

- 6.2 For the current year, £630k (17%) of expenditure has been incurred by the midyear (before capital Re-profiling). A substantial amount of this is due to spend on Electric Vehicle Charging points £104k and Wheatsheaf Walks £166k.

Although the Electric Charging points has an overspend of £84k a grant has been received for £77k and a grant for the other £7k has been applied for from the Department for Transport and is expected to be received.

The costs of the works at Wheatsheaf Walks have largely been met by a grant of £148k received from the Heritage Action Zone.

Comparisons to previous years' programmes are shown in **Table 1**. The expenditure against budget before and after re-profiling is analysed in Appendix B – 2021/2022 Revised Capital Programme Spend to Date against Budget.

Skelmersdale Town Centre has incurred spend of £2.9M at mid-year, however this is excluded from the above as it is funded by internal borrowing (cash balances).

Year	Expenditure £m	Budget £m	% spend against Budget
2021/2022	0.630	3.665	17%
2020/2021	2.085	7.087	29%
2019/2020	0.998	5.175	19%
2018/2019	1.908	7.128	27%
2017/2018	0.455	2.634	17%

7.0 CAPITAL RESOURCES

- 7.1 There are sufficient resources identified to fund the 2021/22 Revised Capital Programme as shown in Appendix A.

- 7.2 The main area of the capital resources budget that is subject to variation is in relation to capital receipts. These are the useable proceeds from the sale of Council assets (mainly houses under Right to Buy legislation) that are available to fund capital expenditure. These receipts can vary significantly depending on the number and value of assets sold.

- 7.3 The budget for useable capital receipts (including the affordable housing element) to be generated from Council House sales in the year is set at

£0.960m from 50 sales. At the mid-year point 10 sales had been completed and the target for the year is expected to be met.

- 7.4 In addition to receipts from council house sales the Council also has a programme to sell plots of land and other assets. The budget for this in the 2021/22 Programme is £100,000. As at the mid-year there has been land sales generating £290,000 for Whalley's Development exceeding the budget.

8.0 SUSTAINABILITY IMPLICATIONS

- 8.1 The Capital Programme includes schemes that the Council plans to implement to enhance service delivery and assets. The Capital Programme also achieves the objectives of the Prudential Code for Capital Finance in Local Authorities by ensuring capital investment plans are affordable, prudent, and sustainable. This report provides an updated position on project plans and shows progress against them.

9.0 RISK ASSESSMENT

- 9.1 Capital assets shape the way services are delivered for the long term and, as a result, create financial commitments. The formal reporting of performance against the Capital Programme is part of the overall budgetary management and control framework that is designed to minimise the financial risks facing the Council. Schemes within the Programme that are reliant on external contributions and/or decisions are not started until funding is secured. Other resources that are subject to fluctuations are monitored closely to ensure availability. The Capital receipts position is scrutinised on a regular basis and managed over the medium term to mitigate the risk of unfunded capital expenditure.

10.0 HEALTH AND WELLBEING IMPLICATIONS

- 10.1 Some of the Capital Schemes will enhance the Health and Wellbeing of residents and the management of the delivery is ensured via the reporting mechanism.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

The majority of the budget issues set out in this report have been the subject of previous reports to committees and consequently an Equality Impact Assessment has already been prepared for them where relevant.

Appendices

- A Funding of Capital Programme
- B 2021/2022 Revised Capital Programme Spend to Date Against Budget
- C Re-profiling of the Capital Programme
- D Minute of Executive Overview & Scrutiny Committee: 21 October 2021 (Cabinet & Council only)
- E Minute of Cabinet: 2 November 2021 (Council only)

APPENDIX A - CAPITAL RECEIPT FUNDING APPROVALS

SERVICE AND SCHEME				
	2021/22	2022/23	2023/24	Total
	£'000	£'000	£'000	£'000
<u>Finance Procurement & Commercial Services</u>				
Parish Capital Schemes	48	30	30	108
Restructuring Costs	190	0	0	190
Capitalise revenue transformation costs.	300	0	0	300
Building Compliance on Commercial Property	20	20	20	60
Civica Financials and Purchasing upgrade	26	0	0	26
Culvert Debris Screens	2	0	0	2
<u>Wellbeing & Leisure</u>				
WL Play Strategy Improvements	187	30	30	247
Allotment Improvements	6	0	0	6
Chapel Gallery Phase 3	5	0	0	5
Nye Bevan Pool Building Works	9	0	0	9
Park Pool Building Works	10	0	0	10
Banks Leisure Centre Building Works	42	0	0	42
Burscough Sports Centre	321	0	0	321
		0	0	0
<u>Environmental Services</u>				
Purchase of Vehicles	40	0	0	40
Purchase of Wheelie Bins	25	0	0	25
Expand In Cab System	4	0	0	4
Waste Collection Projects	2	0	0	2
Litter Bin Policy Review (Cabinet November 2019)	6	5	5	16
Street Cleansing Tools	10	0	0	10

Liverpool Road Cemetery	9	0	0	9
Waste Management Service	35	0	0	35
Robert Hodge Centre - external site improvements relating to Health and Safety Traffic Flow	16	0	0	16
<u>Growth and Development</u>				
Moor Street Phase 2	177	0	0	177
Free Trees	14	6	6	26
Conservation Area Enhancement	15	0	0	15
Skelmersdale Vision	11	0	0	11
Wheatsheaf Walks	11	0	0	11
Affordable housing	247	0	0	247
Preservation of Buildings at Risk	1	0	0	1
Abbey Lake Quarry	20	0	0	20
Mill Dam Lane	3	0	0	3
Alder Lane	5	0	0	5
Economic Regeneration	5	0	0	5
Skelmersdale Gateway Improvements	50	0	0	50
		0	0	0
<u>Housing and Regulatory Services</u>				
Corporate Property Investment Programme	246	164	164	574
Burscough Sports Centre - roofing upgrades	20	0	0	20
M3PP System Replacement	40	0	0	40
Housing Renewal Grants	100	50	50	200
Disabled Facilities Grants	0	100	100	200
CCTV	254	0	0	254
Electric Vehicle Charging point	20	0	0	20
<u>Corporate and Customer Services</u>				
I C T Infrastructure	50	50	50	150

ICT Development Programme	364	200	200	764
Website	20	0	0	20
CRM System	67	0	0	67
Etarmis System	17	0	0	17
Right Kit Right Role Right Refresh - support agile working	142	0	0	142
Microsoft Enterprise Site Licence	35	35	35	105
Digital Transformation - Implementation of IT Strategy	400	0	0	400
Less HRA funding for Strategy	-200	0	0	-200
ICT Upgrades - IDOX system	23	20	20	63
Corporate wifi upgrade	85	0	0	85
Website development	0	170	30	200
Communication devices	40	0	0	40
Planning/building control and land charges system upgrades	0	0	20	20
Egress Secure Email & File Transfer	11	0	0	11
Invest to Save Digital Services	59	0	0	59
Total Programme	3,665	880	760	5,305

APPENDIX B - 2021/22 CAPITAL PROGRAMME
SPEND TO DATE AGAINST BUDGET BEFORE RE-PROFILING

Service	Budget Approval	Spend to date		Amount left
	£000	£000	%	£000
Finance Procurement & Commercial Property	586	9	2%	577
Wellbeing & Leisure	580	0	0%	580
Environmental Services	147	15	10%	132
Growth & Development	559	166	30%	393
Housing & Regulatory Services	680	328	48%	352
Corporate and Customer Services	1,113	112	10%	1,001
Total	3,665	630	17%	3,035

SPEND TO DATE AGAINST BUDGET AFTER RE-PROFILING

Service	Budget Approval	Spend to date		Amount left
	£000	£000	%	£000
Finance Procurement & Commercial Property	586	9	2%	577
Wellbeing & Leisure	580	0	0%	580
Environmental Services	110	15	14%	95
Growth & Development	298	166	56%	132
Housing & Regulatory Services	630	328	52%	302
Corporate and Customer Services	1,113	112	10%	1,001
Total	3,317	630	19%	2,687

APPENDIX C- CAPITAL RE-PROFILING FOR INDIVIDUAL SCHEMES - 2021/22

	£'000	£'000	Notes
		3,665	
<u>Environmental Services</u>			
Waste Collection Project	2		
Waste Management Service	35		
		37	
<u>Growth and Development</u>			
Affordable Housing	247		
Free Trees	14		
		261	
<u>Housing and Regulatory Services</u>			
Renovation Grants	50		
		50	
<u>Total</u>		3,317	
<u>Significant Variances not to be included in Re-profiling</u>			
<u>Leisure & Wellbeing</u>			
Resurfacing of the car park at Blaguegate Lane This is funded by the CCG	160		
Extension of a cycle trail at Cheshire Lines (£218k from Dept of Transport via Sustrans and £40k CIL).	258		
		418	
<u>Total</u>		3,735	



**EXECUTIVE OVERVIEW &
SCRUTINY COMMITTEE:
21 October 2021**

CABINET: 2 November 2021

Report of: Corporate Director of Transformation & Resources

Relevant Portfolio Holder: Councillor Adam Yates

**Contact for further information: Name Helen Morrison (Extn.5227)
(E-mail: Helen.Morrison@westlancs.gov.uk)**

SUBJECT: NEW CUSTOMER FEEDBACK POLICY

Wards affected: Borough wide

1.0 PURPOSE OF THE REPORT

1.1 To seek approval of the new Customer Feedback Policy (previous Complaints Policy).

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW & SCRUTINY COMMITTEE

2.1 That the Policy be considered and that agreed comments be referred to Cabinet, and the Head of Corporate & Customer Services in consultation with the relevant Portfolio Holders.

3.0 RECOMMENDATIONS TO CABINET

3.1 That the draft policy be approved.

3.2 That the Head of Corporate & Customer Services be authorised to amend the Policy having considered any agreed comments of the Executive Overview and Scrutiny Committee and Cabinet.

4.0 BACKGROUND

4.1 The current complaints process has been in place since 2015. The process has three stages; stage one is an informal complaint which is managed by the relevant Service Manager. Stage two and Stage three are formal complaints,

with stage two being dealt with by the Head of Service and stage three, by the Chief Operating Officer. Customers also have the option of raising their complaint with the relevant Ombudsman; Local Government & Social Care Ombudsman (LGSCO) or Housing Ombudsman (HO) if they remain unhappy with the response at Stage three.

- 4.2 Good practice guidelines issued by the LGSCO state that periodic reviews of the process should be conducted.
- 4.3 The Ministry of Housing Communities & Local Government White Paper published in November 2020, sets out clear expectations for landlords in relation to dealing with expressions of dissatisfaction, complaints, including redress and evidence of learning.
- 4.4 Given the new guidance, it is appropriate to conduct a review of the complaints policy to ensure it is fit for purpose. The new policy will also enable the Council to meet its "We Will" action to "Listen and provide feedback to customers about how their views have improved services".
- 4.5 A review of the complaints policy started earlier in 2020, however due to COVID-19, it was delayed. In June 2020, the Housing Ombudsman required all social housing providers to complete and publish a self-assessment of their complaints policy as part of the launch of their new Code of Practice.
- 4.6 Our self-assessment was published in December 2020 and updated in July 2021 to reflect progress made.
- 4.7 As complaints can have a negative connotation, the updated policy is now referred to as a Customer Feedback Policy.

5.0 DEVELOPMENT OF THE POLICY

- 5.1 In order to develop a policy that was fit for purpose, a number of activities have been undertaken and these are detailed at Appendix 2.
- 5.2 The policy has been developed to ensure that it meets the requirements of the HO and the LGSCO best practice, this has resulted in the number of stages in relation to a complaint reducing from three to two.
- 5.3 There will also be an alignment and integration of data gathered through other channels such as MP enquiries and Patch Problems.

6.0 NEXT STEPS

- 6.1 The website and intranet pages will be updated in line with the new procedure.
- 6.2 Through the recording of complaints and expressions of dissatisfaction, trends will be identified and action taken in order to improve or change services as required.

6.3 Learning from complaints will be documented and published on the Council's Website. This will provide evidence of the delivery of the Council's Vision and Priorities as there is a clear link to the 'We Will' statement of " Listen and provide feedback to customers about how their views have improved services".

7.0 SUSTAINABILITY IMPLICATIONS

7.1 The new feedback policy will simplify the process of providing feedback for customers. The learning from complaints will be published on the Council's website, which will evidence to customers how their feedback/views have been used to shape and improve services.

8.0 FINANCIAL AND RESOURCE IMPLICATIONS

8.1 There are no financial or resource implications as a result of this policy change.

9.0 RISK ASSESSMENT

9.1 The actions referred to in this report are covered by the scheme of delegation to officers and any necessary changes have been made in the relevant risk registers.

10.0 HEALTH AND WELLBEING IMPLICATIONS

10.1 There are no health and wellbeing implications arising from this report.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

There is a direct impact on members of the public, employees, elected members and / or stakeholders, therefore an Equality Impact Assessment is required. A formal equality impact assessment is attached as an Appendix to this report, the results of which have been considered in the Recommendations contained within this report

Appendices

1. Draft Customer Feedback Policy
2. Activities undertaken
3. Equality Impact Assessment
4. Minute of Executive Overview & Scrutiny Committee: 21 October 2021 (Cabinet only)



Customer Feedback Policy

October 2021

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Introduction

West Lancashire Borough Council is committed to consistently providing an excellent service to all our customers. We value all feedback about our services and see this as an opportunity to learn, adapt and improve, so that our customers can have confidence in us to deliver a quality standard of service.

We recognise that occasionally things can go wrong. In these circumstances, we want to make it as quick and simple as possible for our customers to raise their concerns, so that we can resolve the issue in a timely way.

We also like to hear from our customers when they have had a positive experience or if we have exceeded their expectations. We will use this information to promote good practice throughout the organisation and give credit to our staff.

Purpose of the Customer Feedback policy

The purpose of this policy is to set out our approach to dealing with customer comments, compliments, and complaints, whilst adhering to the principles of both the Local Government & Social Care Ombudsman and the Housing Ombudsman Service.

We are committed to putting our customers at the heart of everything we do and make it easy for our customers to provide feedback.

Through the Customer Feedback policy, we will:

- Handle all feedback within the agreed timescales, effectively and fairly.
- Offer a range of channels for customers to make a comment, compliment, or complaint.
- Treat all customer feedback equally, regardless of channel.
- Keep customers informed throughout the process; our written correspondence will use plain language and avoid the use of jargon.
- Treat all our customers fairly and recognise all customers have a right to have a voice, be understood and respected.
- Record and analyse all feedback and use this information to identify opportunities for improvements.

The Definition of a Comment, Compliment and Complaint

What is a Comment? – A comment is a verbal or written remark expressing an opinion. Comments on how we could improve services to better meet the needs of customers are always welcome. We will ensure that there is a mechanism in place to monitor any repetition of comments about the services we provide and take appropriate action to resolve these.

What is a compliment? - A compliment is an expression of satisfaction about the standard of service provided. Everyone likes to receive compliments and Council officers are no exception. More importantly, compliments can help us to identify what our customer's value and highlights when we have done a good job.

What is a Complaint? – A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation(whether that service is provided directly by the Council or by a contractor or partner), its own staff or those acting on its behalf, affecting an individual resident or group of residents.

What we cannot deal with under this policy

The following will not be handled through the complaints policy:

- **Requests for a service**

Common requests for service include, reporting a repair to a Council property, reporting a missed bin, fly tipping removal or litter picking. A wide range of services can be accessed via our [website](#).

- **Appeals**

Matters for which there is a right of appeal or a more appropriate or prescribed legal remedy e.g. Licences, Permits, Approvals, Consents, Permissions, Registrations, or any related enforcement action.

When a decision is made and there is a right of appeal, you will be informed of the appeals process in the decision letter. For more information, visit our [website](#)

- **Services provided by Lancashire County Council:**

Lancashire County Council deliver various services in the Borough and complaints regarding their services must be directed to them. An example of some of the services that they provide include:

- Highway maintenance including potholes, gritting, roadworks, street lighting and temporary traffic lights
- Education
- Adult and Children's Social Care
- Libraries

For more information visit [Lancashire County Council](#)

- **Complaints about Freedom of Information requests (FOI)**

For further guidance, please visit our [website](#)

- **Requests for information or an explanation of Council policy or practice**
For example: decisions regarding the assessment of a Housing Application as an appeals process is in place as part of the Housing Allocations Policy.
- **Petitions**
For further guidance, please visit our [website](#)
- **Complaints regarding issues that occurred over 12 months ago**
In line with the Ombudsman, we will only consider complaints that are received within 12 months of the issue occurring. After this time, we will not consider your complaint.

What you can expect from us if you complain

If you have concerns that cannot be resolved at the first point of contact, we will:

- Acknowledge your complaint
- Keep you informed at all stages of the investigation, especially if the investigation is likely to take longer than the agreed timescales.
- Treat your complaint in confidence
- Always treat you with courtesy and fairness
- Provide you with the outcome of the complaint and reasons for any decisions made

What we expect from you if you complain

We hope that you will be fair and courteous in your dealings with us. We will not tolerate aggressive or abusive behaviour/language towards our staff.

How to make a comment, give a compliment or make a complaint

The quickest and simplest way to make a comment, give a compliment or make a complaint is to submit a form, via our [website](http://westlancs.gov.uk), however if you prefer, you can also contact our Customer Services team or write to us:



westlancs.gov.uk



Customer Services – 01695 577177



Complaints and Feedback, West Lancashire Borough Council, 52 Derby Street, Ormskirk, Lancashire, L39 2DF.

Reasonable adjustments

We are committed to ensuring that disabled people are not disadvantaged in accessing our services. We will make reasonable adjustments for disabled people when making a complaint, depending on the individual customer's needs, this could include:

- Providing information in an appropriate alternative format (e.g. large print, Braille, coloured paper etc.)
- Extending of time limits (where it is lawful to do so)
- Using agreed relevant communication channel
- Using plain English in our correspondence or provide an Easy Read service
- Communicate with you through your representative or intermediary

Asking for reasonable adjustments

You can ask us to make a reasonable adjustment when you first contact us or at any time during our consideration of your comment, compliment, or complaint.

Our response to requests for reasonable adjustments

We are committed to treating all customers fairly and we take equality and diversity into account in a positive way. We will make sure that individual needs are considered when applying this policy and that any reasonable adjustments are made as required.

Stages of the complaint's policy

We recognise the difference between a service request (pre-complaint), feedback and a formal complaint, and we will take the appropriate steps to resolve the issue as early as possible

Our complaints policy has two-stages

Stage One

This is the first opportunity for a Service Manager to investigate and respond to the complaint. When submitting your complaint, please provide as much information as possible about your concerns and the outcome that you would like to achieve.

As part of our investigation we will:

- Log and acknowledge receipt of your complaint within five working days
- Provide you with the name of the person investigating the complaint
- We will discuss with you the nature of the complaint and the desired outcome to assist with the investigation
- Aim to respond to your complaint in full, within 10 working days from the date we receive your complaint. However, if this is not possible, we will let you know why and confirm when you will receive a response. This should not exceed a further 10 working days. For more information please see section "Extending response times"
- Provide you with a final written response (which will usually be by email), detailing the outcome of the investigation, reasons for any decisions made and any actions taken to resolve the complaint
- Close your complaint at this point and provide details of how to request a review if you are not satisfied that your complaint has been resolved

Stage Two

If you remain dissatisfied following our investigation and response at Stage one, you can request that a review of your complaint and the decision made is undertaken.

For us to consider your request for a review, you will need to contact us and set out why you believe your complaint remains unresolved and the outcome that you wish to achieve.

You will need to request a review by:



Submitting your request via our [website](#)



Customer Services – 01695 577177



Complaints and Feedback, West Lancashire Borough Council, 52 Derby Street, Ormskirk, Lancashire, L39 2DF.

We will need to receive your request within 28 days from the date of our response to your Stage one complaint.

As part of your request, you will need to be clear on the points that you disagree with and why our response has not resolved your complaint. Please be aware that the review will only focus on the initial complaint, we will not consider new issues.

As part of our review:

- We will acknowledge your request within five working days
- The Head of Service reviewing your complaint may need to ask you for further information to assist with their investigation
- We will strive to respond to your complaint in full within 20 working days. However, if this is not possible, we will let you know why and confirm when you will receive a response. This should not exceed a further 10 working days
- We will provide you with a final written response (which will usually be via email), detailing the outcome of the investigation, reasons for any decisions made and any actions taken to resolve the complaint
- Close your complaint at this point
- We will also provide details of how to escalate the matter to the relevant Ombudsman if you remain dissatisfied

Extending response times

On the rare occasions that we need to use our discretion to extend our response times to enable us to respond to you fully, we will always tell you why. We will need to have a good reason to extend our response times by up to 10 working days and this could include:

- Waiting for information from a third party, e.g. a contractor acting on our behalf, to enable us to fully investigate and respond to you
- Needing more time to undertake interviews, e.g. staff interviews
- Needing longer to gather all the information we need from multiple sources to enable us to properly investigate, particularly if it is a long standing, complex case

Remedies

When the Council is at fault, we will put things right by acknowledging our mistakes and apologising for them, explaining why things went wrong and what the Council will do to prevent the same mistake happening again.

We will ensure that there is a mechanism in place to monitor incidents of the same type and take appropriate action to remedy this.

Where possible, we aim to put you back in the position you would have been had the fault not occurred. In such cases, the remedy could include:

- Talking specific action – such as reviewing a process or policy.
- Consider any financial impact upon you because of the upheld service failure.

We follow the guidelines issued by the Local Government & Social Care Ombudsman and Housing Ombudsman in deciding the appropriate remedy.

Escalation to the Ombudsman

Following our decision at Stage two, if you remain dissatisfied, you can ask the relevant Ombudsman to review how we have handled your complaint.

Our final response will contain the contact details for the appropriate Ombudsman's office.

Local Government & Social Care Ombudsman

The Local Government & Social Care Ombudsman investigates individual complaints about Councils, all adult and social care providers and some other organisations providing public services. They investigate in a fair and independent way.

The Ombudsman will expect you to have gone through all stages of our complaints policy before contacting them, to give us an opportunity to deal with your complaint and put matters right.

If we do not respond to you within a reasonable time (usually up to 12 weeks), they may decide to investigate the complaint anyway.

Contact Information

PO Box 4771
Coventry
CV4 0EH

Telephone: 0300 061 0614

Website: www.lgo.org.uk

Housing Ombudsman Service

The Housing Ombudsman is unable to consider cases until eight weeks after our final response. During that period, you may, if you wish, contact a 'Designated Person', who may be able to help you to resolve the complaint or can refer your complaint on to the Housing Ombudsman Service. A designated person can be an MP or a local Councillor. If you do not wish to take your complaint to a designated person, you can approach the Housing Ombudsman directly.

For more guidance on what a designated person is able to do for you, please visit the Housing Ombudsman [website](#).

Contact information:

PO Box 152
Liverpool
L33 7WQ

Telephone: 0300 111 3000

Website: www.housing-ombudsman.org.uk

Who can complain?

Anyone who has been affected by decisions made by the Council, or the way services have been provided to them can make a complaint.

A representative can make a complaint on behalf of a person where they have been asked to represent them, or if the person is not able to make the complaint themselves.

If you make a complaint for another person, you must provide evidence to show that they:

- Consent for you to act for them
- Consent for you to access relevant personal information about them

Types of complaint

Complaints received via a local Councillor

When we receive a complaint from you via a local Councillor, we will handle the complaint in line with our complaints policy and we will respond directly to the Councillor.

Complaints against members of staff

If you have an issue about a member of staff (this includes people who volunteer on our behalf), we will investigate in line with our complaint's policy and where necessary take appropriate action.

Complaints about the conduct of Councillors

If you want to complain about the conduct of a Councillor please visit our [website](#) where you can download and complete a Councillor complaint form.

Once completed please send it to the Monitoring Officer:

Legal and Democratic Services Manager,
West Lancashire Borough Council,
52 Derby Street,
Ormskirk,
West Lancashire,
L39 2DF

You can also put your complaint in writing and send it to us using the address above.

Complaints received by the Chief Operating Officer

If a complaint is directed to the Chief Operating Officer, it will be handled in line with this policy. We would encourage all customers to submit complaints in the ways detailed in the "How to make a comment, give a compliment or make a complaint" section, to enable the complaint to be handled in a timely way.

Complaints relating to more than one Council service

Where a complaint covers more than one service within the Council, one officer will lead the investigation. We will aim to provide you with a single response wherever possible.

Anonymous complaints

Where the complainant provides sufficient information to identify the issue of concern, we will record and investigate the complaint as far as possible, however we will be unable to issue a formal response, without any contact details.

Dealing with unreasonably persistent complaints and unreasonable complainant behaviour or demands

West Lancashire Borough Council are committed to dealing with all complaints fairly.

We treat all complaints seriously and our officers will respond professionally and work positively with you to find a mutually acceptable resolution. However, there are occasions when a customer's actions and behaviour, or nature and frequency of their contacts with us adversely affects our ability to do our job and we consider such behaviour unreasonable.

The Local Government and Social Care Ombudsman defines unreasonable behaviour as 'Complainants who, because of the nature or frequency of their contact with an organisation, hinder the organisation's consideration of their or other people's complaints'.

Examples of unreasonable behaviour include:

- Refusing to co-operate with the complaint's policy
- Refusing to specify the grounds of the complaint
- Refusing to accept certain issues are not in scope of the complaints police
- Insisting on the complaint being dealt with in a way which is incompatible with our complaints policy
- Making groundless complaints about staff dealing with the complaint and seeking to have them replaced
- Submitting falsified documentation/evidence
- Aggressive, abusive, offensive, or threatening language in any format, this is not just limited to actual physical or verbal abuse, but can include derogatory remarks, rudeness, inflammatory allegations, and threats of violence
- Pursuing a complaint or similar complaint at the same time with the authority and other members e.g. Councillor/Ombudsman
- Submitting repeat complaints with minor additions/variations and insisting that this is a 'new' complaint
- Changing the basis of the complaint as the investigation proceeds.
- Attempting to pursue parallel complaints on the same issue with various departments
- Making excessive demands on the time and resources of officers with lengthy phone calls, emails to numerous officers or detailed letters every few days and expecting immediate responses
- Introducing trivial or irrelevant new information and requesting these to be considered and commented on or raising large numbers of detailed but unimportant questions and insisting they are fully answered
- Sending large volumes of correspondence or an excessive number of contacts
- Refusing to accept the answer that has been provided, continuing to raise the same subject matter without providing any new evidence, continuously adding to, or changing the subject matter of the complaint
- Covertly recording meetings and conversations without prior consent of the other party

- Social media ‘trolling’. Posting inflammatory, offensive, abusive or confidential comments or information online

How we will inform you

If we believe your behaviour in pursuit of your complaint is unreasonable or unreasonably persistent, we will write to you and inform you why we find your behaviour to be unreasonable and the problems it is causing. We will also set out what we propose for future communication with you.

We may take the following actions:

- Requesting contact in a specific form (e.g. by letter only).
- Requesting contact be made with a named member of staff only.
- Setting the number and frequency of contact that will be accepted (e.g. once a week).
- Requiring any personal contact to take place in the presence of a witness and in a suitable location.
- Refusing to deal with future correspondence on the same matter if a decision has already been reached.

If you do not agree with our arrangements for contact, we will listen to your objections, but we may still impose the conditions. However, we will set a review period for the arrangements and this will be no longer than six months. We will let you know in writing, the date the arrangements will be reviewed when we set out our arrangements for contact.

Once we have set out our new arrangements for contact, if you do not comply with them and we feel that your behaviour continues to be unreasonable, we may decide not to respond to your contacts. If we decide this, we will let you know.

If you still disagree with our arrangements, you can ask the Local Government Ombudsman & Social Care Ombudsman to consider whether our decision is reasonable.

Document Control

Document details		
Document Name	Comments, Compliments and Complaints Policy	
Document Version number	V0.1	
Document Status		
Author		
Lead Officer		
Approved by		
Version History		
Version	Change/Reasons for change	Date
Approval History		
Version	Approving body	
Version		

Complaints activities undertaken to develop the Customer Feedback policy

Action	Summary
Research undertaken	<p>Research/benchmarking of other local authorities and Housing Associations complaints and feedback models has been undertaken.</p> <p>Fully considered the requirements of both the Housing Ombudsman and Local Government & Social Care Ombudsman as part of the development of the new policy, process, and staff guidance.</p>
Customer Consultation Exercises	<p>Two separate customer consultation exercises have been undertaken.</p> <p>The initial consultation invited customers to share their views on what is important to them when making a complaint.</p> <p>The second consultation was with customers who have had cause to submit a complaint to the Council, to understand their experience of the process and how their complaint was handled.</p> <p>The feedback from both consultations has been used to shape and influence the new policy.</p>
Officer focus group	<p>Officers from across the organisation took part in a focus group to discuss the existing process and identify improvements.</p>
Process Mapping Exercise	<p>A mapping exercise has been undertaken to understand the current 'as is' internal process across all channels</p>
Customer Journey Mapping	<p>Several real end to end customer complaint journey reviews have been undertaken to understand our customers experience when making a complaint, from the initial contact through to the final response.</p> <p>This exercise identified improvement opportunities which have been incorporated into the new policy.</p>
Website and Intranet review	<p>Identified and reviewed all internal and external complaints guidance and comment, compliment, and complaints forms.</p> <p>A "feedback information hub" will be made available to officers via the Intranet to provide easy access to the feedback policy and guidance.</p>

Letter review/development	A review of response letters has been undertaken. This has resulted in the development of a suite of standardised letters, which are aligned to the Housing Ombudsman and Local Government and Social Care Ombudsman guidelines.
Officer guidance and E Learning	Developed effective complaint handling guidance and training to enable officers to effectively handle and respond to feedback.
Officer training	<p>Three separate effective complaints handling workshops have been facilitated by the Local Government & Social Care Ombudsman, to further develop and enhance complaint handling skills and the value of learning from complaints to shape services and improve our customer experience.</p> <p>Two further workshops will take place in October.</p>
Customer Experience Survey	To gain continual feedback, a feedback experience survey has been developed. It is proposed that this will form part of the feedback policy and will be used as a transactional survey, to enable customers to provide feedback on their experience of the process, once the outcome of their complaint has been finalised.

Equality Impact Assessment Form



Directorate: Transformation & Resources		Service: Corporate & Customer Services	
Completed by: Debbie Johnson		Date: 15/06/2021	
Subject Title: Customer Feedback Policy			
1. DESCRIPTION			
Is a policy or strategy being produced or revised:	Yes (Policy)		
Is a service being designed, redesigned or cutback:	No		
Is a commissioning plan or contract specification being developed:	No		
Is a budget being set or funding allocated:	No		
Is a programme or project being planned:	No		
Are recommendations being presented to senior managers and/or Councillors:	Yes		
Does the activity contribute to meeting our duties under the Equality Act 2010 and Public Sector Equality Duty (Eliminating unlawful discrimination/harassment, advancing equality of opportunity, fostering good relations):	Yes		
Details of the matter under consideration:	New Customer Feedback Policy		
<p><i>If you answered Yes to any of the above go straight to Section 3</i> <i>If you answered No to all the above please complete Section 2</i></p>			
2. RELEVANCE			
Does the work being carried out impact on service users, staff or Councillors (stakeholders):	Yes - Service Users and staff		
If Yes , provide details of how this impacts on service users, staff or Councillors (stakeholders): <i>If you answered Yes go to Section 3</i>	Services users will have a new procedure to follow when making a complaint or providing feedback. Staff will have to deal with complaints and feedback through a new policy and procedure. Staff will also have to attend training.		
If you answered No to both Sections 1 and 2 provide details of why there is no impact on these three groups: <i>You do not need to complete the rest of this form.</i>			
3. EVIDENCE COLLECTION			
Who does the work being carried out impact on, i.e. who is/are the stakeholder(s)?	All WLBC residents, businesses and other stakeholders or anyone visiting WLBC.		
If the work being carried out relates to a universal service, who needs or uses it most? (Is there any particular group affected more than others)?	It is possible that residents will use council provided services more than other stakeholders or visitors.		

<p>Which of the protected characteristics are most relevant to the work being carried out?</p> <p>Age Gender Disability Race and Culture Sexual Orientation Religion or Belief Gender Reassignment Marriage and Civil Partnership Pregnancy and Maternity</p>	<p>Yes Yes Yes Yes Yes Yes Yes Yes Yes</p>
<p>4. DATA ANALYSIS</p>	
<p>In relation to the work being carried out, and the service/function in question, who is actually or currently using the service and why?</p>	<p>Anyone can make a complaint or provide feedback (positive and negative) on council services.</p>
<p>What will the impact of the work being carried out be on usage/the stakeholders?</p>	<p>The new policy will document transparent guidelines for customers making a complaint and providing feedback.</p> <p>It will set customers' expectations and provide clear timescales and should improve customers understanding and awareness of the end to end procedure.</p>
<p>What are people's views about the services? Are some customers more satisfied than others, and if so what are the reasons? Can these be affected by the proposals?</p>	<p>Two customer consultations have been conducted and customers have provided feedback about their expectations and experience of the current complaint procedure.</p> <p>The feedback has been used to shape the new policy and improve how complaints will be handled. One of the improvements will reduce the end to end customer journey down from a three-stage process to a two-stage process.</p>
<p>What sources of data including consultation results have you used to analyse the impact of the work being carried out on users/stakeholders with protected characteristics?</p>	<p>Customer Journey Mapping Citizen survey data x 2 Complaints data (Stage 2 & 3)</p>
<p>If any further data/consultation is needed and is to be gathered, please specify:</p>	<p>As part of the new two stage complaints process customers will be provided with the option of completing a complaint experience survey. This will ensure we capture real time feedback from customers who go through our complaint's procedure, allowing us to continually analyse, improve and create a continuous improvement culture</p>
<p>5. IMPACT OF DECISIONS</p>	
<p>In what way will the changes impact on people with particular protected characteristics (either positively or negatively or in terms of disproportionate</p>	<p>Changes will not negatively impact on any customer with a particular protected characteristic. This is because all customers</p>

<p>impact)?</p>	<p>have the right to make a complaint regardless of age, sex, disability etc The policy will be available upon request to customers should they require alternative formats e.g. (audiotape, CD, large print, Braille).</p> <p>Customers can also make a complaint in a range of ways regardless of any protected characteristic.</p> <p>In addition, the policy includes a reasonable adjustments section which details what we can do depending on the customers needs to make reasonable adjustments whilst going through the complaints procedure.</p>
<p>6. CONSIDERING THE IMPACT</p>	
<p>If there is a negative impact what action can be taken to mitigate it? (If it is not possible or desirable to take actions to reduce the impact, explain why this is the case (e.g. legislative or financial drivers etc.).</p>	<p>There should be no negative actions as the policy aims to streamline the process to make it easier for customers to provide feedback, improve customer awareness and provide clear guidance on how to give feedback.</p>
<p>What actions do you plan to take to address any other issues above?</p>	<p>No actions</p> <p><i>If no actions are planned state no actions</i></p>
<p>7. MONITORING AND REVIEWING</p>	
<p>When will this assessment be reviewed and who will review it?</p>	<p>The complaints policy will be reviewed regularly by the Customer Engagement Team and in line with guidance and best practice in the sector.</p>



**EXECUTIVE OVERVIEW &
SCRUTINY COMMITTEE:**
21 October 2021

CABINET: 2 November 2021

Report of: Director of Transformation & Resources

Relevant Portfolio Holder: Councillor Adam Yates

**Contact for further information: Name: Nesan Thirunesan / Samantha Tierney
(E-mail: Nesan.Thirunesan@westlancs.gov.uk
Samantha.Tierney@westlancs.gov.uk)**

SUBJECT: DATA QUALITY POLICY

1.0 PURPOSE OF THE REPORT

1.1 To seek approval of the new Data Quality Policy.

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW & SCRUTINY COMMITTEE

2.1 That this policy be considered and that agreed comments be referred to Cabinet, and the Director of Transformation Services in consultation with the relevant Portfolio Holders.

3.0 RECOMMENDATIONS TO CABINET

3.1 That the draft policy be approved.

3.2 That the Director of Transformation & Resources be authorised to amend the Policy having considered any agreed comments of the Executive Overview and Scrutiny Committee and Cabinet.

4.0 BACKGROUND

1. Government departments, inspectors and regulators require information to meet their responsibilities for making judgments about performance and governance. With the abolition of inspection regimes, including removal of the Audit Commission's data quality assessment and assurance, more emphasis is now placed on local arrangements and self-regulation. The weight attached to published data as the basis for reducing the burden of

regulation and awarding freedoms and flexibilities has significantly increased the importance and emphasis on the quality of the data being used.

2. The council's approach to data quality is informed by a set of standards recommended in 'Improving Information to Support Decision Making Standards for Better Quality Data' (Audit Commission) and 'Managing Local Performance: A Toolkit for Data Quality' (Local Government Association).
3. The purpose of this policy is to have in place strong arrangements for managing the quality of the data collected and used by both the council and its partners setting out the council's approach, ensuring that:
 - a) information is of high quality, accurate, valid, reliable, timely, relevant, and complete in nature
 - b) data quality is fully embedded across all services and is a key consideration in collecting, processing, or using data to support decision making.
4. By achieving high standards of data quality, the council and its partners will:
 - a) have assurance in the information supplied so that there will be confidence in the decision-making processes and strengthen the relationship between the council and partners
 - b) provide and publish data, which is reliable, timely and robust
 - c) be able to respond effectively to service provision and quality of life issues affecting our communities.

5.0 DEVELOPMENT OF THE POLICY

- 5.1 In order to develop a Data Quality policy that was fit for purpose, a number of stakeholders ranging from Business Analysts, to service managers and project staff working within the "Effective Data Management Programme" were engaged. Thorough research of Data Quality Management Frameworks of other similar councils was also considered in the development of this policy.

6.0 NEXT STEPS

- 6.1 This policy will be communicated and roll out across the council to ensure robust Data Quality Management is in place in line with this policy.

7.0 SUSTAINABILITY IMPLICATIONS

- 7.1 The new Data Quality policy will evidence if there are any shortcomings with the quality of information / data held within the councils information systems and help shape and improve services.

8.0 FINANCIAL AND RESOURCE IMPLICATIONS

- 8.1 There are possible financial and resource implications as a result of this policy implementation which will need to be considered.

9.0 RISK ASSESSMENT

- 9.1 The actions referred to in this report are covered by the scheme of delegation to officers and any necessary changes have been made in the relevant risk registers.

10.0 HEALTH AND WELLBEING IMPLICATIONS

- 10.1 There are no health and wellbeing implications arising from this report.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

There is no direct impact on members of the public, employees, elected members and / or stakeholders, therefore an Equality Impact Assessment is not required

Appendices

1. Draft Data Quality Policy
2. Minute of Executive Overview & Scrutiny Committee – 21 October 2021 (Cabinet only)



Information Governance

Data Quality Policy

Document Owner	Chris Twomey (SIRO) Chris.twomey@westlancs.gov.uk
Version	V1.0
Approved	23 June 2021

Purpose

1. The purpose of this policy is to have in place strong arrangements for managing the quality of the data collected and used by both the council and its partners. This policy document sets out the council's approach, ensuring that:
 - a) information is of high quality, accurate, valid, reliable, timely, relevant, and complete in nature
 - b) data quality is fully embedded across all services and is a key consideration in collecting, processing, or using data to support decision making.
2. By achieving high standards of data quality, the council and its partners will:
 - a) have assurance in the information supplied so that there will be confidence in the decision-making processes and strengthen the relationship between the council and partners
 - b) provide and publish data, which is reliable, timely and robust
 - c) be able to respond effectively to service provision and quality of life issues affecting our communities.

Scope

3. This policy document provides an overarching, corporate approach to the management of data quality to support decision making. Service specific policies and procedures will flow from this corporate policy, where relevant and necessary, thereby ensuring that all the corporate standards outlined in this policy are maintained across the council.
4. This policy supports any data collection including personal information such as contact details held within various major systems across the council.
5. This policy applies to managing the quality of data provided from systems:
 - a) Owned and managed by the council e.g. where services are provided directly by West Lancashire Borough Council.
 - b) Co-owned by the council and managed by a third-party delivering services on behalf of West Lancashire Borough Council e.g. a contractor or arm length organisation providing local services.
 - c) Owned and managed by partner agencies where data is supplied to West Lancashire Borough Council.

(Arrangements to secure data quality for (b) will be through inclusion of relevant clauses in procurement contracts and for (c) through data sharing protocols with key partners.)

6. This policy is aimed at officers and members within West Lancashire Borough Council and underlines the importance that the Council places on

data quality. It is a document which is available to all stakeholders and will be published on the Council website accordingly.

Background

7. Government departments, inspectors and regulators require information to meet their responsibilities for making judgments about performance and governance. With the abolition of inspection regimes, including removal of the Audit Commission's data quality assessment and assurance, more emphasis is now placed on local arrangements and self-regulation. The weight attached to published data as the basis for reducing the burden of regulation and awarding freedoms and flexibilities has significantly increased the importance and emphasis on the quality of the data being used.
8. The council's approach to data quality is informed by a set of standards recommended in 'Improving Information to Support Decision Making Standards for Better Quality Data' (Audit Commission) and 'Managing Local Performance: A Toolkit for Data Quality' (Local Government Association).

Characteristics of good data quality

9. *Robust data*: Producing robust data is an integral part of our operational, performance management, and governance arrangements. The council recognises that there are several key characteristics of good quality data. The data which we report and make decisions on should be:
 - a) **Accurate** - Data should be sufficiently accurate for its intended purposes. Accuracy is most likely to be secured if data is captured as close to the point of activity as possible. Data should be captured once only, although it may have multiple uses. The importance of the uses for the data must be balanced with the costs and effort of collection. Where compromises must be made on accuracy, the resulting limitations of the data should be clear.
 - b) **Valid** - Data should be recorded in an agreed format and used in compliance with recognised council and national standards. Where proxy data is used to compensate for an absence of actual data, it must be considered how well this data is able to satisfy the intended purpose.
 - c) **Reliable** - Data should reflect stable and consistent data collection processes across the council.
 - d) **Timely** - Data should be available within a reasonable time period, quickly and frequently enough to support information needs.
 - e) **Relevant** - Data captured should be relevant to the purposes for which it is used. This entails periodic reviews of requirements to reflect changing needs.
 - f) **Complete** - All data should be captured, in accordance with the definitions, or based on the information needs of the council and data collection processes matched to these requirements. Monitoring missing, incomplete, or invalid records can provide an indication of data quality and can also point to problems in the recording of certain data items.

10. *Data quality objectives:* The council's corporate objectives for data quality define a framework of management arrangements which will assure partners and other stakeholders that the quality of our data is reliable and sustainable. The council's corporate data quality objectives are to:
 - a) ensure arrangements for governance, monitoring and review of data are formalised and an organisational culture that values the quality and reliability of data is fostered
 - b) provide a framework of systems, policies and procedures to improve management of data within the organisation and in partnership with others to ensure the highest possible data quality whilst ensuring that resources allocated to data quality are proportionate to the benefit gained
 - c) provide effective training for our staff and members on expectations in terms of the standards of data quality
 - d) ensure that the information processed and used is held securely and confidentially in accordance with the law, including the Data Protection Act and Freedom of Information Act
 - e) ensure that published information is accessible, timely, valid, and accurate.

11. *Data quality standards:* The council is committed to collecting and processing data according to national, or where these are not available, locally defined standards. A formal set of quality requirements will be applied to all data which is used by the council, shared externally, or provided by a third-party organisation. Achieving these standards will satisfy ourselves and our stakeholders that the data is sound and that it can be used with confidence.

12. *Systems and processes:* The council will ensure that appropriate systems are in place for the collection, recording, analysis and reporting of data. The council recognises the importance of these systems operating on a right first-time principle. The council will effectively consult with staff and partners when developing or implementing new information systems.

13. The council will use the principle of 'collect once and use numerous times' (COUNT) to underpin data collection and storage.

14. *Data Security:* The council will ensure that data is stored in a secure environment with appropriate security and system backups for all business-critical systems. The access and use of data should be appropriate to the data user and comply with relevant legislation (such as the Data Protection Act and the Freedom of Information Act). Systems will be regularly tested to ensure processes are secure. Adequate business continuity plans will be developed and maintained.

Partnership Working: Information sharing is crucial to partnership working. It

is essential that we have confidence in shared data or data supplied by third parties. The council will ensure that a formal framework for data sharing with partners is put in place. This includes identifying and complying with all relevant legal, compliance and confidentiality standards. A validation process will be established for all data provided by partners or other third parties.

15. *Data use and reporting:* The council will ensure that data is used appropriately and in the right forum, so that reliable data is at the centre of decision making. Arrangements will be put in place to ensure that data is also used to manage and improve the delivery of services. Reported information will be made available to staff who produce it to reinforce understanding of the way it is used.
16. *Internal control and validation:* The council will ensure that it has effective validation procedures in place to ensure the accuracy of data used. Data returns will be supported by a clear and complete audit trail and subject to service, corporate and internal audit verification checks. Any errors discovered during the audit will be corrected within established timescales and any improvement actions will be acted upon to continuously improve the council's approach to data quality.

Roles & Responsibilities

17. The council is committed to ensuring that it has the right people with the right skills and knowledge to deliver effective services. This policy applies to all staff within West Lancashire Borough Council who have a responsibility for data quality. However, it is recognised that where staff are assigned a specific data quality role, that role should be clearly defined and documented. To ensure that data quality is managed effectively and to secure a culture of data quality throughout the council, it is important to provide a clear assignment of responsibility throughout the council as outlined below:

Role	Areas of Responsibility
Director of Transformation & Resources	Corporate Management lead for data quality, with responsibility for formulation of policy and overall review and audit of arrangements to ensure compliance
Data Protection Officer	Corporate Management lead with responsibility to enforce compliance with the data quality policy in accordance to the Data Protection Act 2018 and UK GDPR.
Heads of	<ul style="list-style-type: none"> ▪ Ensuring that adequate, safe systems are in place, which hold an acceptable standard of information

<p>Service</p>	<ul style="list-style-type: none"> ▪ Ensuring that the information they provide is accurate, timely and meets relevant guidance ▪ Raising awareness of the data quality policy and implementation throughout the service area ensuring that staff responsible for data are aware of the requirements of the data quality policy.
<p>Information Governance Function</p>	<ul style="list-style-type: none"> ▪ Regularly reviewing and reporting on compliance to the Director of Transformation Services, DPO and via the Information Governance Committee. ▪ Monitoring compliance with the data quality policy and procedures and liaising with the appropriate officers to rectify any non-compliance ▪ Establishing and seeking agreement of a corporate set of indicators that evidence the importance of data quality throughout the council and with partners. ▪ Undertaking review of data accuracy for any medium and high-risk data prior to submission ▪ Carrying out audit checks, establishing systems to validate data quality and reporting back to those who provide data informing the Information Governance Team of any changes to data and/or supporting definitions as they arise.
<p>Systems Teams/ Data Providers</p>	<ul style="list-style-type: none"> ▪ Designated officers with specific responsibility for management of data and/or systems within their service grouping. ▪ Administration of the data system and ensuring that the data in the system is accurate. It is the responsibility of all staff who input, store, retrieve or otherwise manage data to ensure that it is of the highest quality ▪ Liaising with service performance teams in development and ownership of definitions.
<p>Internal Audit/ External Audit</p>	<ul style="list-style-type: none"> ▪ Providing assurance on the effectiveness of data quality, conducted within the audit annual plan ▪ Providing advice and guidance, utilising processes such as DPIA's, to support the establishment of data quality controls for new system developments and providing assurance on the effectiveness of data quality controls in existing systems ▪ Independently test check data linked to the internal audit review programme to provide assurance that it is accurate.
<p>All council staff and Elected Members</p>	<ul style="list-style-type: none"> ▪ Required to adhere to the Data Quality Policy and have a responsibility to ensure that data is handled in a responsible way and that all reasonable efforts are made to ensure the quality of data. ▪ Training and development of staff and an understanding of the importance of data quality for elected members will underpin the achievement of high levels of data quality. Staff will be supported in their responsibility towards capturing quality data. ▪ Data sharing issues with partners will be addressed by staff

	<p>working closely with partners to resolve them. This includes taking reasonable steps in keeping personal data accurate and up to date in line with requirements of the Data Protection Act.</p> <ul style="list-style-type: none"> ▪ The commitment to data quality will be clearly communicated throughout the council to re-enforce the message. Policies, procedures, and guidance will be developed and updated in association with relevant staff. To ensure this policy is embedded, key actions will be developed, monitored, and reviewed.
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Evaluation/Monitoring/Measurement

18. A framework will be implemented to underpin the requirements outlined in this policy for monitoring and review of data quality and to address the results of data quality reviews.
19. Arrangements will be put in place to monitor the quality of data shared between partners whenever new data sharing is required.
20. The council will ensure that it adequately manages risk associated with GDPR data compliance.
21. The council will formally report on data quality as follows:
 - a) services will regularly report issues arising from data quality reviews through departmental management teams or managers
 - b) compliance with the data quality policy and procedures will be reported by the information governance function
 - c) outcomes of internal/external audit reviews will be shared with relevant officer groups and will be regularly reported to the IG Committee, Audit Committee, Corporate Management Team, and Scrutiny Committee. This process will enable the monitoring and review of any previously agreed improvement actions to ensure they have been implemented.
22. Non-compliance to this policy will be reported to the DPO and Corporate Management Team. This will be done on a routine BAU basis. Non-compliance with partners will also be pursued and rectified.
23. The policy is supported by operational procedures and guidance notes.
24. The Data Protection and Impact assessment process will identify data processing and storage arrangements which will be reviewed and updated regularly, alongside the introduction of an annual return for data owners, which will be completed and signed off. The processes will include specific arrangements for ensuring data quality at the point of data capture, during the processing of that data, and appropriate data quality checks before data is released.

25. Service teams will promote policy and procedures and regularly review and report on compliance and be effective in rectifying any non-compliance.
26. Compliance with this policy will be reviewed and reported through routine internal/external audit of the council's systems of internal control and where relevant findings result in a 'limited assurance or no assurance' opinion, details will be reported to the council's Audit and Governance Committee.
27. The council will ensure that arrangements are in place to evaluate the effectiveness and embedding of this policy through:
 - a) regularly reviewing and reporting on compliance with the data quality policy and procedures
 - b) regularly monitoring any actions that support this document.

Review

28. This policy will be formally reviewed at least every three years by the Corporate Management Team (CMT) to ensure that any national or local guidelines, standards or best practice that have been issued and that the council needs to work to, are reflected in a timely manner.

Equality and Diversity

29. West Lancashire Borough Council is committed to promoting equality of opportunity, valuing diversity, and ensuring discrimination, harassment or victimisation is not tolerated. Our policy is to treat people fairly, with respect and dignity. We also comply with the legal requirements of the Equality Act 2010 in relation to age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.



Report of: Chief Operating Officer

Relevant Portfolio Holder: Councillor Mr Ian Moran - Leader of the Council / Portfolio Holder for Economic Regeneration

Contact for further information: Name (Extn. 5237) Peter Morrison
(E-mail: peter.morrison@westlancs.gov.uk)

SUBJECT: CORPORATE PEER CHALLENGE

Wards affected: Borough wide

1.0 PURPOSE OF THE REPORT

1.1 To advise Cabinet that the Local Government Association will be supporting the council with a Corporate Peer Challenge (CPC) in the coming months.

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW & SCRUTINY

2.1 That the Committee consider the content of the report and that the agreed comments of Executive Overview and Scrutiny Committee be passed to Cabinet for consideration.

3.0 RECOMMENDATIONS TO CABINET

3.1 That Cabinet note the contents of the report and the indicative timetable at appendix 1.

4.0 WHO ARE THE LOCAL GOVERNMENT ASSOCIATION (LGA)?

4.1 The LGA is a national membership body for local authorities which works on behalf of its members to support, promote and improve local government.

4.2 The LGA is a politically-led, cross-party organisation that works to ensure local government has a strong, credible voice with national government. Their aim is to influence and set the political agenda on issues that matter to councils so that they are able to deliver local solutions to national problems.

5.0 WHAT IS CORPORATE PEER CHALLENGE?

- 5.1 As part of their support offer, the LGA provides a range of resources and tools to help councils with support and challenge to improve. CPC brings together political and managerial leadership, through the use of member and officer peers to provide robust, strategic and credible challenge and support. CPC also enhances the capacity within the sector and helps to avoid insularity within councils.
- 5.2 The LGA advise that the key principles on which peer support is based have been overwhelmingly endorsed by councils and include the following:
- councils are responsible for their own performance
 - stronger local accountability leads to further improvement
 - councils have a sense of collective responsibility for performance in the sector as a whole
 - the role of the LGA is to help councils by providing the necessary support
- 5.3 The LGA are also keen to point out that CPC is not:
- a sector-owned form of inspection
 - a scored assessment
 - a detailed service assessment
 - driven by external requirements or a set of Key Lines of Enquiry
 - reported to government, although the LGA strongly encourages councils to publish the results
- 5.4 The council will be given the opportunity to define the scope and process, so that it best meets our needs and the needs of the council and community. In addition to this, the challenge team will also assess the council against the following five core elements;
1. Local priorities and outcomes – does the council understand its local context and place and use that to inform a clear vision and set of priorities?
 2. Organisational and place leadership – Does the council provide effective leadership of place through its elected members, officers and constructive relationships and partnerships with external stakeholders?
 3. Governance and culture – Is there effective political and managerial leadership supported by good governance and decision-making arrangements that respond to key challenges and enable change and transformation to be implemented?
 4. Financial planning and management – Does the council have a financial plan in place to ensure long term viability and is there evidence that this is being implemented successfully?
 5. Capacity for improvement – Is organisational capacity aligned with priorities and does the council influence, enable and leverage external capacity to focus on agreed outcomes?

6.0 CORPORATE PEER CHALLENGE – THE PROCESS

- 6.1 In autumn 2019, the LGA invited West Lancashire Borough Council to take part in a CPC however, this had to be put on hold given the emergence of the Covid pandemic.
- 6.2 More recently, the LGA have indicated that they intend to recommence their CPC programme and have offered a challenge for West Lancs, in March 2022. The team will be on site during this time, usually for three to four days, and will hold meetings and workshops to meet staff, citizens and other interested parties.
- 6.3 Ahead of the CPC site visit, the LGA will work with the council to plan the scope of the challenge, identify a suitable and robust challenge team and then plan the process. An initial scoping meeting will be arranged with the leader and chief operating officer, usually four to six months in advance of the CPC. At this meeting the following will be discussed and agreed:
- the main focus of the challenge
 - the nature and composition of the peer team
 - when it would be best to undertake the CPC
 - the value and purpose of any preparatory work / material
 - the nature and form of feedback at the end of the CPC
- 6.4 To ensure the council gets the most appropriate challenge, support and ideas for our specific needs, the peer team will be drawn up in line with the council's needs and will reflect the main focus of the CPC; the council will agree the composition of the team. Once agreed, the LGA encourage the respective leaders and chief officers to make contact and discuss the CPC, confirming each other's expectations.
- 6.5 The LGA anticipate that virtually all of the background preparatory information and documentation will be available in the public domain and therefore the process will not place unnecessary burdens on the council. Any requests for information will be proportionate to the scope and focus of the CPC. The council will however be required to prepare a "position statement" about the main focus of the CPC, this will help the peer team understand the issues involved and can be discussed at the scoping meeting.
- 6.6 At the end of the site visit feedback will be provided, the format this takes will be agreed at the scoping meeting, but usually a roundtable session including an audience of the council's choosing. At this event, the CPC team will share its views and offer comments on the core components and the agreed areas of focus.
- 6.7 A feedback report will be prepared and shared with the council which will outline the main findings and conclusions, recommendations for improvement and innovation, signposting of good practice and case study material. The LGA will also offer an improvement planning session, wider feedback event, or other activity which will enable discussion and development of plans to take forward the learning from the CPC.
- 6.8 It is up to the council how it then use the feedback provided and if it decides to publish the results, although the LGA strongly encourages councils to do so as this shows a commitment to being accountable to the communities being served.

One suggestion cited by the LGA is that the council might publish a statement setting out the findings and recommendations of the peer challenge team along with any improvement actions the council has agreed.

- 6.9 There is an expectation that the council will commit to a follow up visit within two years after the CPC. This will help the council assess and demonstrate the impact of the CPC and the progress made against the areas of improvement and development. This will be a lighter-touch version and does not have to involve all of the original peer team, although experience demonstrates that on-going dialogue with members of the peer team develops and this has proved valuable.

7.0 SUSTAINABILITY IMPLICATIONS

- 7.1 At this time there are no significant sustainability impacts associated with this report and, in particular, no significant impact on crime and disorder. However, the outcome of the CPC and any resultant improvement actions may have an impact.

8.0 FINANCIAL AND RESOURCE IMPLICATIONS

- 8.1 There will be a need for officers and stakeholders to engage in the CPC, attending meetings and workshops. The council will also be required to produce a position statement and supportive information ahead of the on-site visit, although the LGA state that the process will be proportionate to the scope of the challenge and will not place unnecessary burdens on the council.

- 8.2 It is expected that the resource implications will be met using existing resources.

9.0 RISK ASSESSMENT

- 9.1 This item is for information only and therefore does not require a formal risk assessment and no changes have been made to risk registers.

10.0 HEALTH AND WELLBEING IMPLICATIONS

- 10.1 At this time there are no health and wellbeing implications arising from this report.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

The decision does not have any direct impact on members of the public, employees, elected members and / or stakeholders. Therefore no Equality Impact Assessment is required.

Appendices

- 1 Indicative Timetable
- 2 Minute of Executive Overview & Scrutiny Committee – 21 October 2021
(Cabinet only)

APPENDIX 1 – Indicative Timetable

Corporate Peer Challenge

Milestone	Date	Comments
Scoping meeting	Usually 4 to 6 months before onsite visit	The following will be determined at the scoping meeting; <ul style="list-style-type: none"> • Main focus of the challenge • Agree make up of challenge team • Value & purpose of any preparatory work / material • Nature & form of feedback
Respective chief officers / leaders make contact	Following scoping meeting	To help get the most from the CPC, the chief officers & leaders are encouraged to make contact after the scoping meeting to discuss and agree each other's expectations
Position statement	Following scoping meeting	The Council will be required to prepare a short statement setting out the current position in relation to the area of focus and the 5 core elements of the CPC. This will help the challenge team understand the issues involved
Information / document review	Following the scoping meeting / before site visit	The challenge team expect that most of the information and documentation needed for the CPC will already be in existence and accessible in the public domain however, there may be a need to support this process
Peer challenge team onsite	March 2022	Date yet to be agreed but the team are usually on site for 3 to 4 days and will hold meeting and workshops with staff, citizens and other interested parties
Onsite feedback session	March 2022	At the end of the onsite visit, the CPC team will provide a feedback session. The nature and form of this feedback will be agreed at the initial scoping meeting
Feedback report	March/April 2022	A feedback report will be shared with the council. This will include the main findings and conclusions, recommendations for improvement and innovation, signposting of good practice and case study material



Report of: Chief Operating Officer

Relevant Portfolio Holder: Councillor Gareth Dowling

Contact for further information: Peter Morrison (Extn. 5237)
(E-mail: peter.morrison@westlancs.gov.uk)

SUBJECT: FOOD INSECURITY

Wards affected: Borough wide

1.0 PURPOSE OF THE REPORT

- 1.1 To share with members the findings report following a research study into food insecurity within West Lancashire.
- 1.2 To recommend actions for implementation that will help tackle food insecurity within the borough in a dignified way, and help address the root causes.

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW AND SCRUTINY COMMITTEE

- 2.1 That the Committee consider the content of the report, and that the agreed comments of Executive Overview and Scrutiny Committee be passed to Cabinet for consideration.

3.0 RECOMMENDATIONS TO CABINET

- 3.1 That Cabinet note the minutes of Executive Overview and Scrutiny Committee attached at appendix 3.
- 3.2 That Cabinet note the findings of the research study and agree to the implementation of the following opportunities, identified in section 5 of the report, to address food insecurity;
 - That the Chief Operating Officer nominates a senior officer within the Council to take overall responsibility for co-ordinating a response to tackling food insecurity in the borough.
 - The establishment of a cross-sector food insecurity forum, led by a WLBC officer, to strengthen ties and support cross-sector co-ordination and that this

- forum commits to a sustainable and dignified approach to tackling food insecurity in the borough.
- Where applicable, the Council and partners highlight the issues which cause food insecurity and their impact at both a regional and national level.
- 3.3 That Cabinet endorse the Portfolio Holder for Communities and Community Safety as Food Security Champion for West Lancashire, providing political leadership at both a local and national level.
- 3.4 That the newly established cross-sector forum, in consultation with the Food Security Champion, consider the other opportunities identified within the research report and where appropriate seek Cabinet / Council approval for their implementation.
-

4.0 BACKGROUND

- 4.1 Council approved the commissioning of a study which would examine Food Insecurity within West Lancashire that would map the existing support available and inform potential development of preventative, sustainable and cost-effective solutions.
- 4.2 Following a tender exercise, Iconic Consulting were appointed and scheduled to commence work on the study in March 2020. However, due to the emerging issues related to the Covid-19 pandemic and lockdown restrictions, it was agreed it would be prudent to postpone the study. At this time there were concerns about the consultant's ability to gather robust evidence of food insecurity, given the competing demands on stakeholder's time to assist and the atypical picture which was emerging in relation to families accessing food.
- 4.3 In September 2020, it was agreed with Iconic Consulting that the research should go ahead which involved the following tasks;
- A review of literature on food insecurity including the nature and extent of the problem, the characteristics of those experiencing it, and initiatives developed elsewhere to address the issue.
 - Analysis of local, regional and national data related to food insecurity.
 - A brief review of local, regional and national policy.
 - A mapping exercise to gather information on existing services in West Lancashire that seek to address food insecurity.
 - Consultation with 17 stakeholders including Councillors and senior staff from WLBC, and service providers in West Lancashire that seek to address food insecurity, including local foodbanks, welfare support, and other community and voluntary sector organisations.
 - Consultation with five West Lancashire residents with "lived" experience of food insecurity. The interviews gathered the residents' views and experiences of times when they have struggled to feed themselves or their families, and considered how people in their situation could be better supported in the future. The residents volunteered to take part in the research following awareness raising by local third sector organisations supporting people experiencing food insecurity.

- A workshop with nine participants – three officers/elected members from WLBC and six representatives from local third sector organisations supporting people experiencing food insecurity and poverty. The workshop discussed the emerging study findings and potential opportunities to address food insecurity in West Lancashire in the future.
- An assessment of the costs and benefits of the potential opportunities identified during the study to tackle food insecurity. The assessment considered the economic, social and environmental costs/benefits.

- 4.4 In addition to the tasks listed in paragraph 4.3 Iconic Consulting held feedback sessions to share the draft findings. Sessions were held with the Communities Sector Open Forum, a communities group, established and supported by the Council, to help address the issues in our communities as a result of COVID-19, the Council's Corporate Management Team and a session was offered for members of the Council. The final findings report is included at appendix 1.
- 4.5 During the session with members of the Council, the Portfolio Holder for Communities and Community Safety volunteered to act as the Food Security Champion and expressed a commitment to achieving the outcomes of the findings report.

5.0 KEY FINDINGS – THE SCALE OF THE PROBLEM

- 5.1 Some of the key findings from the study are highlighted below. Table 1 sets out the food insecurity estimates within the borough for 2018. These estimates have been identified using headline findings for the UK and applying them locally. The report highlights that food insecurity can be closely linked to fuel poverty, with people often having to make the difficult decision of 'heating or eating'. Data from the Council's Financial Inclusion Strategy 2021-24 shows that 11.5% or approximately 5,489 households were in fuel poverty in 2018 and this figure could be used as an approximation of the scale of the problem.

Indicator	UK Figures	West Lancashire Estimates
<u>Households</u> experiencing food insecurity	9.8%	4,580 households
<u>Households</u> experiencing severe food insecurity (severe = skipping meals, experiencing hunger)	2.8%	1,310 households
Children aged under 16 living in food insecure households	11.0%	2,175 households

Table 1 - Food Insecurity in West Lancashire (pre – COVID-19)

- 5.2 Cabinet will be aware that COVID-19 has had a significant impact on food insecurity and poverty throughout the UK, brought about by furlough, job losses, welfare dependence and mental health;
- The Food Foundation reported that food insecurity **quadrupled** during the first lockdown in spring 2020.
 - The Trussell Trust reported an **89%** increase in foodbank use in April 2020 and 100,000 people using foodbanks for the first time.

- Independent foodbanks reported an increase in usage of **177%** in May 2020
- 5.3 During the pandemic the three established foodbanks in the borough Skelmersdale, Ormskirk and Digmoor Community foodbank together with the Brichwood Centre provided a total of 10,522 emergency food parcels from the start of July to the end of December 2020. This equates to an average of 405 parcels per week.
- 5.4 Some of the drivers that lead to food insecurity will not come as a surprise, and include the following;
- Commonly, the benefits system
 - Debt
 - Addiction
 - Family breakdown
 - Challenging life experiences e.g. eviction, divorce
 - Adverse work experience e.g. redundancy, reduced hours
 - Ill-health
 - Lack of informal support from friends and family

6.0 OPPORTUNITIES TO ADDRESS FOOD INSECURITY

6.1 Section 4 of the research study sets out the findings of a mapping exercise which details the existing support available across the borough to address food insecurity, this includes emergency food aid, community food shops, community cafés and kitchens, community growing spaces and welfare services.

6.2 The mapping exercise, together with consultation with local stakeholders and the consultant's knowledge of initiatives in other areas have informed Section 5 of the study, which identifies potential opportunities to address food insecurity in West Lancashire. These opportunities have been presented under the following headings;

6.2.1 Influencing policy at a national level

- WLBC and partners highlight the issues which cause food insecurity and their impact at a regional and national level.

6.2.2 Strategic actions for West Lancashire

- Improved co-ordination and co-operation
 - Establishment of a cross-sector forum, led by WLBC, to strengthen ties and co-ordination.
 - The forum commits to a sustainable and dignified approach to tackling food insecurity in the borough.
 - An existing senior officer of the Council takes overall responsibility for co-ordinating a response to tackling food insecurity.
 - A WLBC councillor takes on the role of Food Security Champion, providing political leadership at a local and national level.
- Funding for organisations
- Funding for individuals

6.2.3 Local initiatives in West Lancashire

- Person-centred rapid response team to support new referrals / service users, to identify and address the root causes of food insecurity and build in a proactive referral policy
- Extension of the Café Birchwood approach in other areas to provide a dignified and engaging means of support
- Development of additional access points for emergency food to address geographic gaps outside of Ormskirk and Skelmersdale and limited opening times
- Extension of community food shop network including rollout of joined-up services such as Village Food Club that address underlying causes
- Expansion of the community growing spaces and development of a scheme to use produce from space including Burscough Community Farm
- Enhance links with the local agricultural sector to improve the supply of affordable, locally grown food
- Encourage the use of third-party waste reductions approaches such as the OLIO app, which enables free distribution of perishable foods to divert to landfill

6.3 A number of the above opportunities could be implemented relatively quickly and without the need for additional resources. These have been identified in paragraphs 3.2 and 3.3 of the report and it is recommended that these are implemented as a priority. It is also recommended that the newly established cross sector forum, in consultation with the Food Security Champion, review the other opportunities identified within the findings report and progress them as appropriate.

7.0 SUSTAINABILITY IMPLICATIONS

7.1 The proposals will result in a co-ordinated approach to food insecurity across West Lancashire, helping residents to access healthy food and looking to address the root causes so that we can support a more sustained approach.

8.0 FINANCIAL AND RESOURCE IMPLICATIONS

8.1 It is expected that the proposals outlined for implementation will have some resource implications, however these will be met utilising existing resources.

9.0 RISK ASSESSMENT

9.1 The research study highlights the impact and scale of food insecurity in the borough. Failure to act and implement the initiatives presented will mean that the root causes of food insecurity will not be addressed.

10.0 HEALTH AND WELLBEING IMPLICATIONS

10.1 Food insecurity and poor nutritional intake can significantly impact on an individual's health and wellbeing. The research identified that stress, depression and anxiety associated with food insecurity affect more than half of households who are referred to foodbanks. Children who grow up in food insecure homes are more likely to have poor health and worse educational outcomes compared to children growing up in food secure homes.

10.2 The recommendations look to provide a co-ordinated approach to food insecurity within West Lancashire in a dignified manner and help address the root causes.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

There is a direct impact on members of the public, employees, elected members and / or stakeholders, therefore an Equality Impact Assessment is required. A formal equality impact assessment is attached as an Appendix to this report, the results of which have been taken into account in the Recommendations contained within this report

Appendices

1. Appendix 1 – Food Insecurity in West Lancashire – Iconic Consulting
2. Appendix 2 – Equality Impact Assessment
3. Appendix 3 – Minutes of Executive Overview and Scrutiny Committee – (Cabinet only)

Food Insecurity in West Lancashire

Final Report

April 2021

West Lancashire Borough Council

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1 Introduction

West Lancashire Borough Council (WLBC) commissioned this research on food insecurity to inform the potential development of preventative, sustainable and cost-effective policy solutions to food insecurity in West Lancashire. The study set out to:

- Evaluate the socio demographic and other characteristics of households in the Borough experiencing food insecurity to develop a clear understanding of the local picture.
- Establish a better understanding of who is using foodbanks in the Borough and provide insight into potential gaps in accessing them or gaps in accessing sufficient welfare support.
- Understand the severity and chronicity of household food insecurity and how often people are receiving assistance from foodbanks and other supporting agencies.
- Establish the economic status of those facing insecurity.
- Establish and assess the current support and provision already available in the Borough to address the issue.
- Consider the health implications of those living with food insecurity.

In addition, the study set out to consider:

- The steps the Borough can take to prevent food inequality.
- How the Borough can make the best use of the range of services and approaches already available and respond more effectively.
- Opportunities for communities across the Borough to grow their own food, through the Community Food Growing network, West Lancashire Allotment Federation, primary and secondary schools.
- How community centres and voluntary organisations can support the local Birchwood Café model and divert supermarket waste food from landfill.
- How the Borough can invest in longer term sustainable solutions so that more can be done to make people less reliant on foodbanks and alternatives.
- Prevention opportunities through financial inclusion and other initiatives.
- Long-term sustainable models to prevent food insecurity.
- How the project will support wider social value in the Borough i.e. social, environmental and economic costs and benefits.

Iconic Consulting was commissioned by WLBC to undertake the research. The study was due to start in March 2020 but was paused because of the Covid-19 pandemic and lockdown restrictions. WLBC gave the go-ahead for the research to begin in September 2020 and it has involved the following tasks:

- A review of literature on food insecurity including the nature and extent of the problem, the characteristics of those experiencing it, and initiatives developed elsewhere to address the issue.
- Analysis of local, regional and national data related to food insecurity.
- A brief review of local, regional and national policy.
- A mapping exercise to gather information on existing services in West Lancashire that seek to address food insecurity.
- Consultation with 17 stakeholders including Councillors and senior staff from WLBC, and service providers in West Lancashire that seek to address food insecurity, including

local foodbanks, welfare support, and other community and voluntary sector organisations.

- Consultation with five West Lancashire residents with lived experience of food insecurity. The interviews gathered the residents' views and experience of times when they have struggled to feed themselves or their families, and considered how people in their situation could be better supported in the future. The residents volunteered to take part in the research following awareness raising by local third sector organisations supporting people experiencing food insecurity.
- A workshop with nine participants – three officers/elected members from WLBC and six representatives from local third sector organisations supporting people experiencing food insecurity and poverty. The workshop discussed the emerging study findings and potential opportunities to address food insecurity in West Lancashire in the future.
- An assessment of the costs and benefits of the potential opportunities identified during the study to tackle food insecurity. The assessment considered the economic, social and environmental costs/benefits.

This report is structured as follows:

- Section 2 sets out the nature and extent of food insecurity in West Lancashire.
- Section 3 summarises policy and services designed to address food insecurity.
- Section 4 describes the existing support in West Lancashire to address food insecurity and identifies gaps in provision.
- Section 5 considers opportunities to address food insecurity in West Lancashire in the future.
- Section 6 draws together the study conclusions.

2 Food insecurity in West Lancashire

In this section we outline the nature and extent of food insecurity in West Lancashire. The section starts with a definition of food insecurity. It then draws on the literature and national data to identify the socio demographic and economic characteristics of households experiencing food insecurity, and the severity and chronicity of household food insecurity in West Lancashire. The literature and data are also utilised to identify the characteristics of foodbank users and how often people tend to receive assistance from foodbanks. The health implications of food insecurity are also summarised. Finally, the impact of Covid-19 on food insecurity is addressed.

What is food insecurity?

An extensive literature review on food insecurity in the UK undertaken by Heriot-Watt University, on behalf of the Trussell Trust¹, highlighted the most commonly used definition of food insecurity:

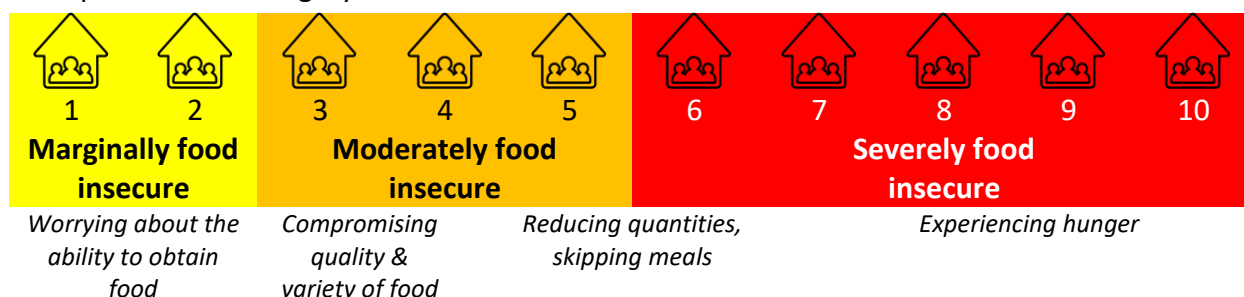
‘Food insecurity exists whenever the availability of nutritionally adequate and safe foods, or the ability to acquire acceptable foods in socially acceptable ways, is limited or uncertain’.

The report highlighted the significance of the definition, referring ‘to the social and economic problem of lack of food due to resource or other constraints’ which it distinguished from ‘fasting or dieting or the effects of illness’. It also noted that the definition captured ‘a range of experiences, from going without meals and not being able to afford a nutritionally adequate diet, to feeling insecure about where the next meal is going to come from’.

Severity of food insecurity

The severity of household food insecurity varies, and the term tends to be broken down into three categories – households that are marginally, moderately, or severely food insecure.

Surveys have been used to examine whether households are food insecure, and to estimate the severity of the issue. The surveys tend to use a standard set of ten questions (see Appendix). Originally used in the US Household Food Security Survey Module the questions have been applied internationally, including in the UK where they form part of the Food & You survey in England, Wales and Northern Ireland, and the Scottish Health Survey. Responses to the ten questions are used to estimate the severity of household food insecurity using the scale below; examples of each category are shown beneath the scale.



¹ Sosenko F, Littlewood M, Bramley G, Fitzpatrick, S, Blenkinsopp, J & Wood, J, 2019. [A State of Hunger. A study of poverty and food insecurity in the UK](#)

The extent of household food insecurity in the UK and West Lancashire

The headline findings from the 2016-18 surveys referred to above show that in the UK:

- 9.8% of households experienced food insecurity.
- 2.8% of households experienced severe food insecurity.
- 11.0% of children aged under 16 lived in food insecure households.

The above food insecurity figures for the UK can be used to estimate food insecurity for other geographies including West Lancashire. Although such estimates are relatively simple, they serve a useful purpose in the absence of more detailed modelling on food insecurity. Using demographic data produced by Lancashire County Council², estimates of food insecurity in West Lancashire for 2018 are as follows:

- 4,580 households in West Lancashire experienced food insecurity.
- 1,310 households in West Lancashire experienced severe food insecurity.
- 2,175 children aged under 16 in West Lancashire lived in food insecure households.

Food insecurity can be closely linked to fuel poverty, with people often having to make the difficult decision of 'heating or eating'. The West Lancashire Financial Inclusion Strategy 2021-24 shows that 11.5% of households in West Lancashire were in fuel poverty in 2018 which was approximately 5,480 households³. This figure could be used as an alternative approximation of food insecurity in West Lancashire. The Financial Inclusion Strategy also notes that there are between 21-28% of households with children under 16 in West Lancashire living in relative poverty (defined as households that receive 50% less income than average median incomes) and another 21-28% living in absolute poverty (defined as households where income is insufficient to afford basic necessities of life such as food, clothing, or shelter).

It should be noted that the above figures relate to the extent of food insecurity and poverty before the Covid-19 pandemic. As discussed elsewhere in the report, the pandemic led to a significant increase in food insecurity and poverty throughout the UK.

Who is affected by food insecurity?

Extensive literature exists on the households affected by food insecurity. The Heriot-Watt University and The Trussell Trust report cited above found the chances of being food insecure were higher among the following household types:

- Lower income households (annual income below £10,400).
- Lone-parent households.
- Single working-age adult households.
- Households who rented, particularly social renters.
- Unemployed people.
- Younger people (aged 16 to 24).
- People affected by ill-health.

The study also found that gender could be an additional factor in some households and noted that in households with two adults and at least one dependent child, the women tended to be more food insecure than the men. The authors suggested this was because women were more likely to skip or reduce their own meals so the children could eat.

² Lancashire County Council, 2018. [Demographic Dashboard](#)

³ [Financial Inclusion Strategy 2021-24](#)

Our literature review confirmed that low-income is a critical factor in food insecurity. Clearly, households where disposable income is limited are more susceptible to food insecurity than those with greater incomes. In addition, evidence shows that food insecurity has been increasingly problematic for low-income households over time - between 2004 and 2016, food insecurity among low-income adults across the UK rose from 28% in 2004 to 46% in 2016⁴. One factor that can exacerbate or reinforce issues such as food insecurity among low-income households is the so-called 'poverty premium'. This occurs when low-income households face disproportionately higher costs or charges for utilities such as energy, access to internet and mobile phone bills⁵. Research by the University of Bristol estimated the poverty premium costs the average low-income household £490 a year, although the cost to some households is as high as £1,190 a year⁶.

Foodbanks and foodbank users

Foodbanks began to appear in the UK around 2010 and their use has been steadily increasing since in response to rising levels of food insecurity. The Trussell Trust network of foodbanks, constituting around 61% of all foodbanks in the UK, grew from 65 in early 2011 to 1,261 in 2019. By 2019, there were also 809 independent foodbanks in the UK bringing the total to 2,070. Together these foodbanks are estimated to have distributed three million emergency food parcels across the UK in 2019. The Trussell Trust reported that more three-day emergency food parcels were given out in North West England than in any other part of the UK⁷. The Heriot-Watt University report estimated that approximately 2% of all UK households used a foodbank in 2018/19. IFAN, the Independent Food Aid Network, estimated there were at least 961 independent foodbanks in November 2020⁸.

The Trussell Trust estimate that the average number of foodbank visits over a year was 2.6. It should be noted that use of a Trussell Trust foodbank usually requires a voucher issued by referral organisations such as a local authority, advice provider or Jobcentre/DWP and households are generally limited to three referrals to a Trussell Trust foodbank in a six-month period. Independent foodbanks set their own eligibility criteria and access tends to be less stringent and more frequent than the Trussell Trust foodbanks.

The Heriot-Watt University report highlighted that four fifths of Trussell Trust foodbank users were severely food insecure. The profile of foodbank users is therefore not surprisingly, similar to that of those affected by food insecurity. Significant demographic factors prevalent among foodbank users include:

- Low income.
- Unemployment.
- Ill-health.
- Lone parents.

⁴ Loopstra R, Reeves A, Tarasuk V. The rise of hunger among low-income households: an analysis of the risks of food insecurity between 2004 and 2016 in a population-based study of UK adults. 2019

⁵ All-Party Parliamentary Group on Hunger and Food Poverty, 2014. [Feeding Britain: A strategy for zero hunger in England, Wales, Scotland and Northern Ireland](#)

⁶ Davies S, Finney A, Hartfree, Y, 2016. [Paying to be poor: uncovering the scale and nature of the poverty premium](#). University of Bristol's Personal Finance Research Centre

⁷ Trussell Trust, 2019. [End of year stats](#)

⁸ IFAN, 2020. [Independent Food Bank Emergency Food Parcel Distribution in the UK February to November 2019 and 2020](#)

- Working-age adult living alone.
- Living in rented accommodation.

The Heriot-Watt University report also highlighted that young people are at risk of food insecurity but are less prevalent among foodbank users, suggesting they are less likely than other groups experiencing food insecurity to access emergency food parcels.

The need for support from a foodbank was very clearly demonstrated by the finding that 94% of foodbank users were destitute (see Appendix for a definition of destitution). Median weekly equivalised household income after housing costs was approximately £50 per week in 2018 and therefore substantially lower than the official relative poverty threshold of £262 per week after housing costs.

It is important to note that foodbank use is not confined to people living in deprived areas⁹. As the evidence presented in this section demonstrates, the key factors are personal circumstances and socio demographic characteristics, not area of residence.

Drivers of food insecurity and foodbank use

Food insecurity is driven by low income, material deprivation and poverty. There is substantial evidence that the main reason people are referred to a foodbank is linked to the benefits system. This includes delays, sanctions and benefit changes, which together account for around 52% of referrals made to foodbanks by Citizens Advice Bureaux¹⁰. The All-Party Parliamentary Inquiry into Hunger report on ‘Feeding Britain’ identified additional reasons for foodbank use including debt, addiction, and experiences of family breakdown.

In 2019, The Trussell Trust’s Introduction to a Study of Poverty and Food Insecurity in the UK¹¹ noted that evidence about drivers of foodbank use ‘highlight the role of key policy developments since 2011, such as benefit sanctions, the roll-out of Universal Credit, cuts in Housing Benefit, changes to disability benefits, and the freezing of benefits’. As well as benefits-related issues, the report went on to identify other drivers of foodbank use as:

- Challenging life experiences such as eviction or divorce.
- An adverse work-related experience such as losing a job or reduced hours.
- Ill-health or a disability.
- Lack of informal support from friends and family.

A recent survey of independent foodbanks¹² found that almost all indicated that people with benefit issues and people who were unemployed made up a significant proportion of their clients. For those in work, the increased use of zero hours contracts and wage stagnation have resulted in more people being in ‘precarious, insecure, low-paid work’¹³. The report noted:

‘Quite a few foodbanks reported that groups less often observed in Trussell Trust foodbanks made up a large proportion of their clients. For example, 71% of

⁹ Garrat, 2017. [Foodbank use in the UK is more complex than suggested, according to new research](#)

¹⁰ [Citizens Advice Bureaux foodbank survey](#) (Citizens Advice, 2014)

¹¹ Sosenko F, Littlewood M, Bramley G, Fitzpatrick, S, Blenkinsopp, J & Wood, J, 2019. [A State of Hunger. A study of poverty and food insecurity in the UK](#). The Trussell Trust

¹² https://uploads.strikinglycdn.com/files/0681ad7a-2d07-489f-9c11-77dc3d1aa968/Report_IndependentFoodBankStudy_Dec2019-pdf.pdf

¹³ [Tackling Poverty Together](#) (Devlin and Ramsay, 2016)

(independent) foodbanks reported people in part-time work made up a large proportion of their clients; 62% reported people on zero-hour contracts made up a large proportion of their clients; and 36% even reported having a large proportion of people in full-time work. Among Trussell Trust foodbanks, only 14% of households using foodbanks include someone with employment, and this is very rarely full-time employment’.

Furthermore, the survey of independent foodbanks found that a higher proportion (37%) reported that people with no recourse to public funds made up a significant proportion of their clients, compared to only 5% of Trussell Trust foodbanks. Waiting for a benefit payment or decision was one of the three most common reasons for independent foodbank use and many of the foodbanks in the survey also reported debt, benefit sanctions, and insufficient incomes to meet living costs as among the three most common reasons for their clients’ accessing foodbanks.

The Health Foundation’s review of progress in addressing health inequalities highlighted by the Marmot review¹⁴ concluded that the main reasons for the increases in foodbank use are ‘the impact of low wages and increasing costs of other household necessities, and the freezing of benefit rates in 2016 and other changes to the benefit system, which reduced the value of benefits’. The report also cited evidence of the impacts on foodbank use of rising housing costs, the five-week wait for the first Universal Credit payment, cuts to support programmes (such as Healthy Start), limits to eligibility for free school meals, and decreasing food welfare budgets.

Health implications of food insecurity

In 2019 the Food Foundation analysed price data for 94 healthy and unhealthy foods and drinks (using categories developed by the Food Standards Agency). In each year between 2007 and 2017 the average price of healthy food was more expensive than unhealthy food. The poorest decile of English households would need to spend close to three-quarters of their disposable income on food to meet the guidelines in the NHS Eatwell Guide, compared with only 6% of income for households in the richest decile¹⁵.

The Health Foundation review cited above, examined the evidence that shows that in the previous 10 years, working-age families with children within the five lower income deciles had experienced the most significant and negative impacts in the long-term as a result of tax and welfare policies affecting their ability to buy nutritious food and remarked that:

‘There is also widespread concern at food insecurity and poor nutritional intake and impacts on health and wellbeing; likely contributing to inequalities in cancer, diabetes and coronary heart disease. Stress, depression and anxiety associated with food insecurity affect more than half of households who are referred to foodbanks and a quarter of households have a member with a long-term physical condition or illness in 2018. Children who grow up in food insecure homes are more likely to have poor health and worse educational outcomes compared with children growing up in food secure homes’.

¹⁴ Health Foundation Feb 2020. [Health Equity in England: the Marmot review 10 years on](#)

¹⁵ <https://foodfoundation.org.uk/wp-content/uploads/2019/02/The-Broken-Plate.pdf>

Poor diet is a risk factor in obesity¹⁶, cancer, coronary heart disease (CHD) and diabetes¹⁷. Poor diet is characterised by excessive intake of saturated fat, salt or sugar which are common in processed food, and an insufficient consumption of fruit and vegetables, and dietary fibre.

Food insecurity also has social and psychological impacts such as social isolation, anxiety and depression. The impact on children can be particularly negative, with reports of children in Lancashire taking food from school bins¹⁸. The social and psychological consequences of experiencing food insecurity, combined with the physical health costs of an inadequate diet, present key challenges when trying to improve health, reduce health inequalities and reduce health costs¹⁹.

The impact of Covid-19

Food insecurity and foodbank use increased significantly during the Covid-19 pandemic.

In April 2020, a report for the Food Foundation²⁰ estimated that the number of adults who were food insecure in Britain quadrupled under the lockdown, with key factors being availability of food in shops, and lower incomes (including amongst those typically not previously at risk of food insecurity). The report concluded that susceptibility to food insecurity worsened for the economically vulnerable, including those experiencing income losses and self-isolation. Our consultation with a small number of West Lancashire residents with lived experience of food insecurity included one person with longstanding mental health issues. This resident reported their increased anxiety during the pandemic prevented them from going food shopping and as a result there were times when they did not eat.

The Trussell Trust reported an 89% increase in the number of emergency food parcels provided in April 2020 compared to the same month in 2019. Research undertaken for the Trust by Heriot-Watt University and the National Institute for Economic and Social Research²¹, found that people who had not previously used foodbanks did so during the lockdown. The research found that almost 100,000 households received support from a foodbank in the Trussell Trust network for the very first time between April and June 2020. The research also forecast future demand for foodbanks based on the economic impact of the pandemic. The findings predicted a significant rise in levels of destitution in the UK by the end of 2020, and at least an extra 300,000 emergency food parcels likely to be distributed by foodbanks in the Trussell Trust network in the last quarter of 2020 – an increase of 61% compared to the previous year. The research suggested that levels of need could be even higher than forecast depending on factors such as the strength of the economy and a second wave of Covid-19 (which subsequently occurred). The latest information available shows that the Trussell Trust's foodbank network provided 1,239,399 emergency food parcels to people in crisis between April and September 2020 compared to 843,655 in the same months in 2019.

¹⁶ [Understanding Food in the Context of Poverty, Economic Insecurity and Social Exclusion](#) (Food Standards Agency in Northern Ireland, 2015)

¹⁷ [Food Poverty and Health Briefing Statement](#) (The Faculty of Public Health of the Royal Colleges of Physicians, 2005)

¹⁸ [Hungry children 'eating from school bins' in Morecambe](#) (BBC, 2019)

¹⁹ [Food Poverty](#) (NHS Health Scotland, 2018)

²⁰ https://foodfoundation.org.uk/wp-content/uploads/2020/04/Report_COVID19FoodInsecurity-final.pdf

²¹ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2020/09/the-impact-of-covid-19-on-food-banks-report.pdf>

IFAN also reported significant increases in the number of emergency food parcels distributed by independent foodbanks as a result of the pandemic²². They reported a 177% increase in the number of emergency food parcels distributed in May 2020 compared to May 2019. In addition, 47% of their members had increased the size of their parcels to support people with a food supply for a longer time period than usual. They also noted that access to referral services has been affected:

‘69% of our data set, have seen an increase in the number of self-referrals or have started to accept self-referrals (15%) as a result of the COVID-19 crisis. Although telephone and internet-based systems have replaced some referral services, these are not necessarily accessible to people living with no or low income. Of the 69 organisations reporting to have started to accept self-referrals and an increase in self-referrals, 46% reported supporting people unable to access referral agencies. 19 of these 32 organisations had supported up to 40 households in this situation’.

The Poverty and Inequality Commission²³ found that community organisations in Scotland reported that demand for emergency food aid had been rising during the pandemic and they expected this to continue as more people in poverty become aware of the help offered and more people experienced poverty for the first time. Many organisations, they claimed, were working to full capacity and had concerns over whether they would be able to continue to meet the rising demand.

As the pandemic has continued and the impacts of furlough, job losses and welfare dependence have increased, concerns have grown about increasing levels of poverty, with more families struggling to make ends meet. A high-profile campaign by Marcus Rashford and others to extend access to free school meals during school holidays highlighted the issue of the impact of food insecurity on children and this became an ongoing political issue²⁴. The Office for Budget Responsibility (OBR), the Treasury’s independent forecaster, reported in July 2020 that unemployment could rise beyond the levels seen in the 1980s. The latest figures from the ONS show that the unemployment rate was 5.0% in the quarter November 2020 - January 2021²⁵.

²² <https://www.foodaidnetwork.org.uk/ifan-data-since-covid-19>

²³ <https://povertyinequality.scot/wp-content/uploads/2020/06/Food-insecurity-PIC-response-and-recommendations-June-2020.pdf>

²⁴ <https://www.independent.co.uk/news/uk/politics/free-school-meals-live-vote-petition-uk-mps-marcus-rashford-boris-johnson-b1308103.html>

²⁵ [Employment in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

3 Addressing food insecurity

This section of the report summarises the key interventions aimed at supporting people experiencing food insecurity, and highlights calls to tackle the underlying causes. National and local policies are also summarised.

Supporting people experiencing food insecurity

The following summarises five key interventions aimed at tackling food insecurity in the UK. These summaries set the scene for the mapping of interventions in West Lancashire presented in section 4.

Emergency food parcels / foodbanks

Emergency assistance in the form of a food parcel for households experiencing food insecurity. The parcels tend to include a nutritionally balanced range of food supplies intended to support the recipients through an emergency situation for a short period of time such as three or seven days. This category includes foodbank services although emergency food parcels are provided by many other organisations in the public, community and voluntary sectors. A referral is often required from another service (such as a health service, Citizen's Advice Bureau, local authority welfare rights service, or third sector provider) and access can be limited to a prescribed number of uses in a specific timeframe; Trussell Trust, the main foodbank provider in the UK, flags up users who present with more than three vouchers in a six-month period. Parcel contents tend to be sourced through donations from food retailers, wholesalers and producers or the general public, as well as being supplied by intermediary organisations such as FareShare that redistribute surpluses from the food supply chain, including supermarkets. Some initiatives seek to refer or signpost people to local advice and support services in an attempt to address the underlying issues that led to them needing an emergency food parcel.

Community food shops

Variably referred to as community food shops, larders, fridges, co-operatives, pantries or food clubs, this type of support is set up to feel like a shop and allows people to choose from the items available. There may be a small cost per visit and/or membership fee and there can be limits on the number of items that can be taken per visit. A referral is not usually necessary although some do operate on a referral-only basis. Food tends to come from the same sources as those listed above for emergency food parcels. Additional essentials such as toiletries, laundry, cleaning products and personal care items may be available, adding to the retail-like environment. These initiatives tend to have a no-questions asked ethos and so generally do not have formal relationships with advice and support services, although some do. Some also provide additional support such as informal advice on budgeting or suggested recipe cards. Broadly speaking, these initiatives tend to have dignity and choice as key principles in the way they provide their service and have become more prevalent for the reasons discussed below.

Community kitchens and cafés

These initiatives provide low-cost food in community settings and tend to be centred around bringing people together and tackling social isolation as well as addressing food insecurity. Some incorporate additional support in the form of donated clothing or drop-in visits from advice and support services. There is often informal 'pastoral' type support available if wanted. Most are community-based, volunteer-led initiatives with limited and insecure funding. Operating hours can also be limited. They rely on surplus and donated food from a variety of sources including those listed above. Their ability to provide consistent quality and range, especially perishables (fresh fruit, vegetables, dairy and meat) can be a challenge.

Community growing projects

These initiatives are recognised as a helpful and dignified addition to helping people to access low-cost food. While community growing projects have a role in the alleviation of household food insecurity it is important to note that some projects - including many allotments - do not specifically aim to tackle the issue. As well as traditional allotments, community growing projects connected to schools, community food or welfare projects such as Homestart encourage people to grow their own food, get involved in growing food for sale at low cost, or to grow, prepare and eat food together. Some include cookery workshops or lessons, advice on food and healthy eating or signposting to other services.

Practical cooking skills

Opportunities for people to acquire and improve their ability to cook healthy nutritious food from scratch. Sessions are delivered in a variety of settings including in some community kitchens where people are encouraged to join in with preparing the communal meal and some community food initiatives situated within wider community projects, growing schemes or hubs. Some provide help with budgeting skills, or signpost to other services.

Addressing food insecurity is closely associated with the provision of emergency food parcels, particularly by foodbanks, although this is not the only type of intervention, as shown above. As the number of foodbanks and the level of use have increased quite markedly in recent years, some academic papers have questioned the model²⁶ arguing that ‘this practice undermines calls for direct actions to both reduce the production of surplus food and to address upstream drivers of food insecurity and ensure the right to food’. A ‘cash first’ approach has been advocated whereby people in financial crisis are encouraged to access existing financial entitlements through advice and support as an alternative to emergency food aid; the approach has drawn on experience from the Menu for Change project in Scotland and is advocated by the likes of the Independent Food Aid Network and Sustain and has been adopted by the Scottish Government.

As well as concerns about tackling the root financial causes of food insecurity, the need for sustainability and for a rights-based approach to support, concerns have been raised about the reliance on volunteers to provide emergency food aid. Furthermore, some food insecure people or households are reluctant, or unable, to access foodbanks because of: 1) feelings of embarrassment and shame, 2) a belief that it does not offer them what they need, 3) lack of availability locally, particularly in rural areas or areas poorly served by public transport, or 4) that the local foodbank is open so infrequently that it is not perceived as accessible.

Recognition has grown that support for people experiencing food insecurity needs to be more compassionate and respectful. Dignity has become a key principle in delivering initiatives to enable improved access to nutritious and affordable food²⁷. Dignity underpins many of the alternatives to emergency food aid including community kitchens, larders, pantries and other community food retail initiatives. Additionally, opportunities to grow food through allotments and community gardens are being seen as a further helpful addition to the range of initiatives that can facilitate dignified access to sufficient and sufficiently nutritious food. Similarly, practical cooking skills projects are seen as a dignified means of supporting people to help themselves and improve their ability to access a good nutritious, affordable diet.

²⁶ <https://foodresearch.org.uk/publications/is-it-appropriate-to-use-surplus-food-to-feed-people-in-hunger/>

²⁷ <https://www.nourishscotland.org/projects/dignity/>

In September 2020, Sustain published guidelines for developing projects²⁸ which concluded:

‘Although their scope in addressing the underlying causes of poverty is variable, community food retail initiatives can help maximise families’ incomes and provide community-based solidarity. People should be able to feed themselves and their families in a dignified way. Food aid initiatives should sit alongside advocacy for more sustainable and long-term changes to policies around wages and benefits that reflect the real cost of living and a situation where healthy food is affordable to all... The current food system does not make it easy for people on a low-income to access an affordable healthy diet and diverse retail models can help mitigate this, with some offering more sustainable and/or dignified solutions than others’.

National policy - addressing the root causes of food insecurity

There is widespread recognition, from academics and those supporting people experiencing food insecurity, of the need to address the root causes of the issue. For example, the Trussell Trust recently stated²⁹:

‘We are clear that food cannot be the answer to people needing a foodbank – and that everyone should have enough money to afford essentials. That is why we need a national social security system which provides everyone with enough to keep them out of serious financial hardship, and is responsive to individual needs and changing circumstances. But it is also vital to have a safety net at the local level, which can be adapted and tailored to local needs and can provide flexible discretionary emergency support when people are at risk of falling through gaps in the national system. Local welfare assistance, whereby local authorities provide crisis support to people, is a fundamental part of this local safety net’.

Central government allocated funding to all upper tier local authorities in England for the Local Welfare Assistance scheme to help people on low incomes or receiving benefits in an emergency situation. The funding was passed on to councils on a non-ring-fenced basis and with no statutory duties attached. The funds were expected to be concentrated on those facing greatest difficulty in managing their income and to enable a more flexible response to emergency situations through a combination of cash and goods. Availability, awareness and access to the scheme across England is mixed.

The Government commissioned an independent review as part of the development of a national food strategy. The review’s initial report³⁰ noted that:

‘Most disadvantaged children can get left behind by food insecurity and the lifelong legacy of poor nutrition in childhood and that in the post-lockdown recession, many more families will struggle to feed themselves adequately. A Government that is serious about “levelling up” must ensure that all children get the nutrition they need’.

A joint report from the IPPR thinktank and the TUC³¹ argued that the UK’s social security offering, even with recent amendments in response to the economic impact of the pandemic, was

²⁸ <https://www.sustainweb.org/publications/community-food-retail-and-food-poverty/?section=#>

²⁹ Trussell Trust, 2020. [Local Lifelines Investing in Local Welfare During and Beyond Covid-19](#).

³⁰ <https://www.nationalfoodstrategy.org/>

³¹ <https://www.ippr.org/research/publications/a-family-stimulus>

inadequate to cope with the expected steep rise in joblessness caused by the pandemic. As a result, the report forecast increased reliance on foodbanks for families, and called for specific welfare measures to reduce child poverty.

Public Health England's strategy 2020-25³² makes no mention of food insecurity or access to food, but includes the ambition to:

'Enable current and future generations to live in local environments that promote a healthier weight as the norm and make it easier for everyone, regardless of background, circumstance or where they live, to access healthier food, enjoy healthier diets and live active lifestyles'.

West Lancashire policy

Health and wellbeing is a priority in West Lancashire and this study directly addresses recommendation 21 of Lancashire's Fairness Commission report³³ which stated:

'We recommend an increase in the number of sustainable locally-led community projects such as community food growing, co-operatives and 'grow, cook and eat' projects to produce, distribute and share quality, healthy food.'

The Fairness Commission heard that the drivers of food insecurity in West Lancashire reflect the national picture, and added:

'The trade-off between food and fuel poverty ("eating or heating"), for example, is all too real and many older people struggle to maintain their standard of living ... Those requiring support from the benefits system to maintain a basic standard of living are currently facing significant challenge with increasing dependency on support from foodbanks and short-term lenders ... Those currently in work reported reduced workplace benefits and problems with zero-hour contracts. Charities that try to provide a route back to work for lower-skilled jobseekers reported that the cost of transport to work can significantly reduce income to such an extent that new employees are forced to use foodbanks. These challenges are particularly acute for former addicts who may be stigmatised because of past dependency on alcohol or drugs. Low pay is exacerbated by the rising cost of energy and foodbank volunteers suggested a correlation between food and fuel poverty'.

West Lancashire's Financial Inclusion Strategy 2021-24³⁴ acknowledges that difficulty paying food bills can be one impact of financial exclusion. The Strategy aims to ensure there is a comprehensive offer for all citizens of West Lancashire to tackle poverty and financial inequalities across the Borough and it sets out the following objectives:

- To be a Council that enables and empowers partners, specialist agencies and stakeholders to work together to deliver a range of relevant and supportive financial inclusion services that meets the needs for all citizens.
- To offer a borough-wide brand for services and key messages to promote awareness and improve access, use and signposting of existing and any new services.

³² [Public Health England Strategy 2020-25](#)

³³ [Fairer Lancashire Fairer Lives](#)

³⁴ [Financial Inclusion Strategy 2021-21](#)

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- To be a borough that will tackle digital exclusion, and work with partners to provide other cost effective solutions where there is an identified need.
 - To build on and develop access and opportunities to training and employment targeted at key financially vulnerable groups.
 - To provide a one door, multi-agency offer with access to other advice services so citizens facing financial hardship are supported at the right time and through an effective referral process.

This study on food insecurity is also linked to the Council Plan 2019-2021³⁵ which prioritises delivering tangible and visible improvements in the Borough and engaging and empowering local communities. The Plan includes commitments from the Council to provide a wide range of opportunities that promote health and wellbeing in the community, target resources to most effectively support improvements in health and/or reduce health inequalities in the Borough, and to implement the Health and Wellbeing Strategy³⁶. The Health and Wellbeing Strategy includes the following commitments: undertaking community food initiatives to provide residents with essential dietary and lifestyle advice to enable healthier living; provision of a health professional team to carry out community engagement to encourage healthier lifestyles, such as undertaking health walks, delivery of exercise sessions, sports activities; and food seminars in local schools, colleges and community buildings, as well as providing accredited nutritional training.

³⁵ [Council Plan 2019-2021](#)

³⁶ [West Lancashire Health and Wellbeing Strategy 2018-21](#)

4 Food insecurity and welfare support in West Lancashire

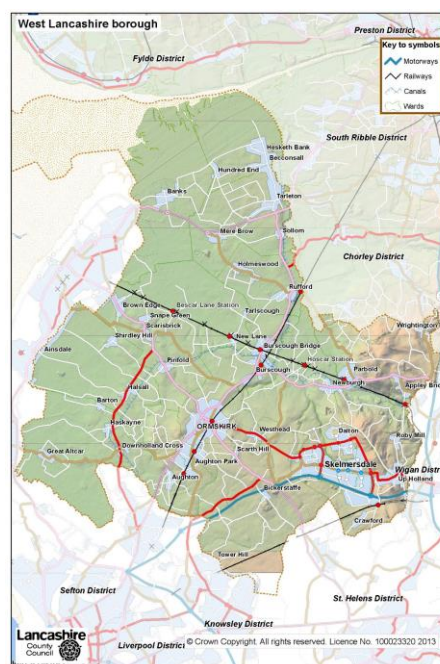
This section utilises information gathered by the mapping exercise to establish and assess the current support available in the Borough to address food insecurity, this includes welfare support as well as services directly addressing food insecurity. Where available, information is presented on the number and characteristics of those accessing these services in West Lancashire. The section also seeks to identify potential gaps in existing support. Findings from our consultation with people with lived experience of food insecurity are presented where relevant.

Emergency food parcels / foodbanks

The mapping exercise identified three established foodbanks in West Lancashire that provide emergency food parcels. Two of the providers are part of the Trussell Trust national network of foodbanks (Ormskirk and Skelmersdale) and Digmaor is independent.

Provider	Status	Access points	Delivery
Ormskirk Foodbank	Part of Trussell Trust network	<ul style="list-style-type: none"> New Church House, Ormskirk town centre 	Approximately 40 volunteers
Skelmersdale Foodbank	Part of Trussell Trust network	<ul style="list-style-type: none"> Ecumenical Centre, Skelmersdale town centre Oak House, Tanhouse, Skelmersdale Trinity Methodist Church, Old Skelmersdale 	3 part-time staff and approximately 30 volunteers
Digmaor Community Foodbank	Independent foodbank operated by Evermoor Enterprises	<ul style="list-style-type: none"> Evermoor Hub, Digmaor, Skelmersdale 	Approximately 15 volunteers

As shown in the table above, two foodbanks are based in Skelmersdale and one in Ormskirk. Between them Skelmersdale Foodbank and Digmaor Community Foodbank have four distribution points across the town. This includes a town centre location and access points in Tanhouse, Digmaor and Old Skelmersdale. Ormskirk is served by only one distribution point in the town centre. Approximately 60% of West Lancashire’s population live in Skelmersdale and Ormskirk and are therefore within reasonable travelling distance of an existing foodbank (ignoring for now barriers such as public transport services and finance). The most obvious geographic gap in access points is the northern villages such as Banks, Hesketh Banks and Tarleton which are approximately 10 miles north of Ormskirk. Previously, an independent foodbank (the Grove) existed in Burscough before it ceased operating in early 2020. Burscough is approximately 3 miles north of Ormskirk.



As part of the same network, the two Trussell Trust foodbanks reported they work collaboratively to serve

distinct catchment areas. Data provided by the two foodbanks shows that service users were distributed across West Lancashire. Beneficiaries were concentrated in the two main towns of Skelmersdale and Ormskirk, where the majority of West Lancs residents live. The data shows that residents of Burscough and the northern villages do access the foodbanks in Ormskirk and Skelmersdale. Ormskirk Foodbank reported that some people from the northern villages use Southport Foodbank as it is more accessible, particularly when relying on public transport. Table 2 shows the main location (wards) of Trussell Trust foodbank users in 2020.

Foodbank	Wards	Vouchers
Skelmersdale Foodbank	Tanhouse	237
	Skelmersdale South	125
	Ashurst	124
	Digmoor	98
	Skelmersdale North	95
	Moorside	72
Ormskirk Foodbank	Scott	206
	Knowsley	67
	Burscough East	55
	Derby	53
	Burscough West	50
	Aughton Park	25

Digmoor Community Foodbank reported support was available to anyone in West Lancashire, although they tend to support residents of Skelmersdale, particularly the local neighbourhood where they are located. This was supported by Skelmersdale Foodbank which reported its service users figures for Digmoor were lower due to the presence of Digmoor Community Foodbank.

Foodbanks in some other areas have outreach centres to enable people to access support closer to home which is more convenient, can save them time and money travelling, and can engage people who may otherwise not seek support. As noted above, West Lancashire’s foodbanks have a number of access points in Skelmersdale and Ormskirk but none outside the main towns meaning, prior to Covid-19, residents from other areas had to travel to one of the towns, or Southport, to access support. Public transport can be a barrier to accessing a range of essential services and one of the foodbanks reported access can be difficult given the public transport system in West Lancashire and they had experience of people taking taxis to return home with their emergency food parcel. During Covid-19 lockdowns, emergency food parcels have been delivered to those in need which was a valuable service, albeit a temporary one. Once the lockdown restrictions end, those in need outside Skelmersdale and Ormskirk will face the same challenges accessing support. For this reason, we recommend in section 5, the development of additional emergency food aid access points in West Lancashire. We are aware there have been some tentative discussions among Burscough based organisations regarding foodbank services in the area following the demise of The Grove; outreach by one of the established foodbanks may be an option.

Skelmersdale Foodbank has plans to increase the times people can visit to pick up an emergency food parcel in the future. Their plans include evening and weekend opening to make it easier for working people, including those working shifts, to access support. Before the pandemic, the three foodbanks had limited daytime opening hours on weekdays only.

During the Covid-19 pandemic, the three foodbanks provided significant support to those in need. Emergency food parcels were also provided by Birchwood, a charitable organisation based in the Tanhouse Centre in Skelmersdale as part of a co-ordinated approach to support people in need during the crisis. Recipients were identified by a wide range of public and third sector organisations. Birchwood provides a range of support for vulnerable people experiencing difficulties with their mental health and well-being, and had provided Christmas hampers for a number of years (as the other emergency food aid providers have also). Birchwood’s food parcels included a week’s worth of shopping including toiletries, and some ready cooked meals prepared by the Centre’s chef. Data gathered by WLBC showed a total of 10,522 emergency food parcels were provided by the three foodbanks and Birchwood from the start of July to the end of December 2020 – an average of 405 per week. The independent providers were responsible for the majority of the parcels with Birchwood averaging 249 and Digmaor 126 parcels per week; Ormskirk Foodbank and Skelmersdale Foodbank averaged 14 and 15 parcels per week respectively during the period. During the Covid-19 pandemic, emergency food parcels have also been provided to a small number of people in need in the northern parts of West Lancashire by Hesketh Bank and Tarleton Helpers. This is a smaller scale demand-led service operated by clergy and volunteers at All Saints Parish Church, Hesketh Bank and Our Lady Help of Christians Catholic Church, Tarleton.

Skelmersdale and Ormskirk Foodbanks provided valuable information on the number and characteristics of those accessing emergency food provision. The data showed that over 4,100 people were fed by Skelmersdale and Ormskirk Foodbanks in 2020, including over 1,700 children. Skelmersdale Foodbank accounted for approximately two thirds of the total. The two foodbanks issued approximately 1,500 vouchers. Digmaor Community Foodbank estimated about 15 people used the foodbank each day before the Covid-19 pandemic, a figure that had doubled since then.

Indicator	Ormskirk Foodbank	Skelmersdale Foodbank	Total
Adults	942	1,452	2,394
Children	606	1,116	1,722
Total fed	1,548	2,568	4,116
Vouchers	601	949	1,550

The data from Skelmersdale and Ormskirk Foodbanks also showed:

- A 37% increase in the number of people fed from 2019 to 2020 made up of a 32% increase in the number of adults fed and a 46% increase in the number of children fed.
- Single households were the main recipients accounting for 35% of the total, followed by families (27%), single parents (24%), and couples (13%).
- The main reasons recorded for needing a parcel were: low income (44%), benefit changes (23%), benefits delays (14%), debt (11%), and sickness (8%).
- The main referral agencies varied between to the two foodbanks. At Skelmersdale Foodbank the two main referral agencies were West Lancs ARK (46%) and WLBC (34%), whereas at Ormskirk Foodbank the main sources were Jobcentre Plus (43%) and self-referral (27%).

The three foodbanks all reported some repeat use of their services. Digmaor has a voucher system issued by the likes of Social Workers and Health Visitors although people without a voucher are also supported. Generally, they try to limit users to three parcels in a six-month

period although they reported this was not strictly enforced. Digmaor reported a small but significant number of regular users including “people who visit every couple of months and people who have been coming here for years”. The Trussell Trust’s use of a voucher and comprehensive IT systems flags up repeat users who receive more than three vouchers in a six-month period. Skelmersdale Foodbank take a proactive approach to such cases, which involves contacting the referral agency to make them aware of the situation and to encourage them to discuss it with the person. By doing so, the foodbank is attempting to reduce reliance on their support and tackle the root cause of the food insecurity. This proactive approach could provide a template for support across West Lancashire.

Ormskirk supports people without vouchers, and they account for approximately 1 in 10 of their service users. The Ormskirk Trustees took the decision to do so as an increasing number of people were presenting without vouchers looking for support. Ormskirk volunteers have access to a folder of agencies they can signpost users on to for additional support for a range of issues including money and debt, mental health, substance misuse, and domestic violence. Churches Together in Ormskirk, which operates the foodbank also run West Lancs Debt Advice which provides a close relationship with that service. Ormskirk reported some regular users including some presenting as often as once a month. Our consultation with a small number of West Lancashire residents experiencing food insecurity confirmed some had made repeated use of foodbanks over a sustained period of time without being offered support to address the underlying issues that led to them seeking emergency food aid. Overall, it is our view that there is scope to improve support to tackle the underlying causes of food insecurity among foodbank users in West Lancashire.

Table 1 demonstrated that the emergency food providers in West Lancashire are heavily reliant on volunteers to deliver their services. Only Skelmersdale Foodbank has paid staff, with three part-time employees (Project Manager, Warehouse Manager and Distribution Manager) in addition to approximately 30 volunteers. The recruitment of paid staff was made possible by a fixed-term grant from the Trussell Trust which the Foodbank reported reflected the Trustees’ desire for the organisation to be resilient, sustainable and professionally run as well as reflecting the ongoing need in the town. The Foodbank also reported the recruitment of staff had made a positive difference to the organisation and their operations. Ormskirk and Digmaor foodbanks are both entirely volunteer run. The time and commitment shown by all of the volunteers is invaluable and highly commendable, allowing the three providers to support people experiencing food insecurity across West Lancashire over a number of years. However, voluntary sector organisations in general can face ongoing challenges such as capacity, skills gaps, and partnership working which can impact on service delivery and development. The experience of Skelmersdale Foodbank suggests paid staff can make a positive difference to services and we recommend that Ormskirk and Digmaor foodbanks give due consideration to a similar model. The three foodbanks may also wish to consider greater co-operation as a means of sharing costs such as warehousing and transportation, and minimising risk.

The food and other essentials such as toiletries and cleaning products, provided by West Lancashire’s foodbanks are sourced from donations and FareShare. The foodbanks benefit from a series of collection points in supermarkets across West Lancashire and neighbouring areas which gather public donations. They are also members of FareShare which distributes surplus food from supermarkets and suppliers. The three foodbanks also benefit from direct donations from the public and local companies. All reported an increase in food donated during the Covid-

19 crisis, for example, Skelmersdale saw an increase from 16 tonnes of food donated in 2019 to 20.5 tonnes in 2020. Ormskirk Foodbank also reported a significant increase in donations, and they re-distributed some of their surplus stock to Birchwood in the run-up to Christmas. Not only did this make best use of the donated goods, but it also demonstrated the good relations that exist among emergency food providers in West Lancashire. Local farmers donated significant volumes of food during the pandemic which would otherwise have gone to waste, for example, a local producer donated potatoes that could not be sold, as intended, to food outlets that were forced to close during the lockdown. The three foodbanks reported that the contents of their food parcels are tailored to the recipients, within the constraints of the supplies they have available. They strive to include healthy, nutritious contents, and take account of dietary needs and choices. Contents also reflect household size and age of household members. Trussell Trust foodbanks provide three-day emergency parcels. Digmoor has a flexible approach and will provide supplies for a longer period where appropriate.

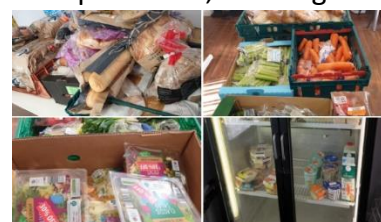
Community food shops

As highlighted in section 3, community food shops are increasingly part of services to address food insecurity, and this is the case in West Lancashire. The mapping exercise identified three providers that include community food shops alongside other services designed to address food insecurity.

Provider	Location	Access	Cost
Birchwood	Tanhouse Community Centre, Skelmersdale	Drop-in	Voluntary donations
Digmoor Community Foodbank	Evermore Hub, Digmoor, Skelmersdale	Drop-in	Voluntary donations
Village Food Hub	Banks, Hesketh Banks, Tarleton and surrounding villages	Click and collect	Membership £5 per week

The Village Food Hub was opened in December 2020 by Compassion Acts, the organisation delivering Southport Foodbank and Southport Food Pantry. It currently operates a click and collect service for people from Banks, Hesketh Banks, Tarleton and the surrounding villages – it therefore provides a valuable service to the northern parts of West Lancashire. It is aimed at those people who are “just about managing” and not in emergency need of food. This service is part of a co-ordinated approach that aims to tackle the root causes of food insecurity. Unlike the other two community food providers, it works on a membership basis. For £5 per week members can choose food worth approximately £20. Access to the Food Hub is via referral from a local organisation rather than drop-in, and once enrolled Hub members are linked into the organisation’s benefits advice, budgeting and Next Steps service. Next Steps aims to help people progress without the need for the foodbank or food pantry and includes mentoring, counselling, life coaching, and the opportunity to attend Compassion Acts’ allotment in Birkdale, Sefton, to learn how to grow food. This is a holistic approach which aims to tackle the root causes of food insecurity and could provide a template for support across West Lancashire.

The community food shops operated by Digmoor Community Foodbank and Birchwood complement their other food-related services. During the Covid-19 pandemic, the Digmoor service has opened daily, when restrictions allow, having previously been available once a week. Approximately 40 people per day use the shop, twice the level before the pandemic. Shoppers pay for items if they can, for example, the shop sells five tins for £1. Fresh vegetables, bread and frozen ready meals are usually available. Money generated by the shop is used to support Digmoor’s food-related services and provide a small but symbolic element of sustainability. Birchwood is also open daily and shoppers make a voluntary donation if they can. It also has a range of produce including fresh vegetables, bakery, tins and packets, as well as some cooked meals. Our consultation with West Lancashire residents experiencing food insecurity included some who had used the community shops at Birchwood and Digmoor. It was striking how frequently these residents used the shops and how reliant they were on them for their essential food supplies. It was also noteworthy that these residents had not been supported to address the underlying issues which led them to use the community food shop. Although the consultation demonstrated the community shops provide a very valuable service to people in need it also demonstrated a level of dependency and lack of focus on addressing the underlying issues. These findings have informed the opportunities presented in section 5 on how partners could better support people experiencing food insecurity in the future.



An increasing number of Trussell Trust foodbanks are opening community food shops across the UK as part of their dignified response to food insecurity. At present neither Ormskirk nor Skelmersdale Foodbank has a shop, or as far as we are aware plans to open one. Generally, community food shopping in West Lancashire is relatively small-scale and opportunities therefore exist to expand provision, linked to support to address the underlying issues.

Community cafés

Café Birchwood is a key element of Birchwood’s services. Formerly known as the Junk Food Café, the service was established to reduce the amount of surplus food going to landfill. The food is sourced from supermarkets and producers for use in the café, as well as the community food shop and emergency food parcels described above. The organisation reported that approximately 60 tonnes of food had been diverted from landfill in the last year. Prior to the Covid-19 pandemic, Café Birchwood operated from three regular venues and supported approximately 6,650 people.

Location	Days	2019 beneficiaries
Tanhouse Community Centre	<ul style="list-style-type: none"> Monday 5-6 pm Wednesday 12-1 pm 	3,577
Ecumenical Centre	<ul style="list-style-type: none"> Thursday 12-1 pm 	776 (Jan – April only)
The Zone	<ul style="list-style-type: none"> Friday 12-1 pm 	2,303 (May – Dec only)
		6,656

The café marked special events such as International Women’s Day, Valentine’s Day, Christmas, and Easter with appropriately themed menus. A monthly café also operated from West Lancashire College and the organisation was also catering for events and parties.

In 2019, volunteers provided approximately 3,200 hours input at Café Birchwood. The volunteers fulfil several roles including preparing and cooking food in the kitchen, front of house and waiting, cleaning, collecting donations and running the complementary pop-up community food shop. The volunteers work alongside Birchwood’s paid staff.

Café Birchwood is also referred to as Birchwood’s Social Inclusion Café reflecting its role in meeting the organisation’s goals. The café embraces a dignified response to tackling food insecurity in a number of ways. Firstly, it aims to create a welcoming atmosphere with tablecloths, flowers and table decorations, music and a table-waiting service. Secondly, diners pay for their meal, albeit at an affordable level of £2 for a three course meal, with under 5s eating for free. Thirdly, the café was previously accompanied by a pop-up community food shop, although this has become a more permanent feature at the Tanhouse Centre during the Covid-19 pandemic, as noted above. Café Birchwood is a dignified and holistic approach (alongside the community shop and cooking courses) to the issue of food insecurity that could provide a template for support across West Lancashire.

Birchwood’s cooking courses have gone online during the Covid-19 crisis and attracted approximately 10 people per week. No other practical cooking courses were identified during this study.

Birchwood was one of a number of organisations, including Digmaor Community Foodbank, providing meals for families during school holidays. Both these organisations have supported local families in this way for a number of years, before the Government provided funding to extend free school meals to school holidays following a high-profile campaign instigated by footballer Marcus Rashford.

Several other community cafés exist across West Lancashire. For example, a weekly lunch club operated on Tuesdays serving two-course meals at the Ecumenical Centre in Skelmersdale (which also functions as a distribution point for Skelmersdale Foodbank), and a similar service operated from Cottage Lane Mission on Wednesdays serving a three-course meal for £5 to approximately 65 people per week. These community cafes tend to be very local, often provided by church or voluntary groups, and are aimed at addressing social isolation, making them difficult to map effectively in a study focused on food insecurity.

Community growing

The table below summarises the key community growing opportunities in West Lancashire. As discussed in section 3, community growing projects and allotments can be part of a sustainable approach to tackling food insecurity

Table 6 – Community growing in West Lancashire			
Organisation/initiative	Location	Management	Size
WLBC allotments	Ormskirk	WLBC	27 plots
Digmaor Inspired Growers Allotment Society	Skelmersdale	Independent	8 plots
Hesketh Bank Allotments and Leisure Gardeners Association	Hesketh	Independent	64 plots
Roby Mill Community Allotment Group	Roby Mill	Independent	8 plots
St Teresa’s Allotment Group	Upholland	Independent	34 plots
Appley Bridge Allotment Society	Appley Bridge	Independent	14 plots
Lawns Avenue	Upholland	Parish Council	17 plots

Table 6 – Community growing in West Lancashire			
Organisation/initiative	Location	Management	Size
Skelmersdale Horticultural Society	Skelmersdale	Independent	60 plots
Liverpool Road	Skelmersdale	Independent	22 plots
Richmond Avenue	Burscough	Independent	14 plots
Burscough Community Farm	Burscough	Independent	18 acres

The West Lancs Community Food Growing project was established after a study found that West Lancashire was very poorly served by the provision of allotments, with the Borough only having 2.5 plots per 1,000 households against a national average of 15 plots per 1,000 households. The report, commissioned by NHS Central Lancashire and carried out by the Wildlife Trust in 2009, also found that there were waiting lists in most areas and particularly for allotments in the Skelmersdale area (where there were over 100 names on the waiting list). By working with local communities between 2009 and 2019, the project helped to almost treble the number of allotments - from 107 to 301 - which is a rate of approximately 6 per 1,000 households. The project aimed to get more people involved in growing their own food and eating more healthily, working with local communities and schools to set up community food growing initiatives and providing help in finding the land (and funds) that might be needed. As part of the project, some raised beds were placed in primary schools and linked into the curriculum. Fruit trees have also been planted in some schools. The annual potato day is a significant event in Skelmersdale, run and promoted by the West Lancashire Allotments Federation.

In addition to the community growing opportunities shown in table 6, a new 12 plot allotment site is being planned in Skelmersdale as part of the new housing scheme at Barnes Road. WLBC is working with Lancashire County Council to finalise details and planning approval has recently been secured. WLBC has also considered working at neighbourhood level to utilise redundant pockets of land, green spaces and brick boxes to provide community growing opportunities. The Council plans involved providing seeds for hardy vegetables for residents to help themselves to, and planting fruit trees. Some local organisations such as Birchwood have used spare land or planters to grow produce. We are also aware of attempts to improve links between the local community, including schools, and the local agricultural sector. One of the stakeholders we spoke to was keen to make links at local level with landowners, farmers and local companies to enable people to grow affordable food.

Burscough Community Farm is a Community Interest Company or social enterprise established in 2014 to improve health and wellbeing and reconnect people with the land. It offers training in growing food, keeping chickens and bees, wood crafts and permaculture, and has in the past supported volunteers from disadvantaged groups including the unemployed, people with mental health issues, and asylum seekers/refugees. The Farm also accepted GP referrals as part of the Active West Lancs 'Fresh Air, Fresh Start' program. Due to its rural location, access via public transport is challenging. Farm produce has been available to purchase including through the Open Food Network. The Farm has previously donated produce to local foodbanks. Community activities were impacted by the Covid-19 pandemic which delayed the relaunching of training and plans for a community allotment (produce would be available to volunteers).

Welfare support services

The table below summarises the key welfare support services in West Lancashire. As shown in the table several public and third sector organisations are involved in the provision of a range of welfare related services. The table is not exhaustive as it excludes small, community-based

initiatives that provide welfare support as part of services focused primarily on issues such as substance misuse or mental health.

Table 7 – Welfare and advice services in West Lancashire		
Organisation/initiative	Location	Description
WLBC Money Advice / Financial Inclusion Team	Skelmersdale and Ormskirk	Budgeting, benefits advice and checks, debt advice, and referrals to CAB and foodbanks where appropriate. Initially support to Council tenants was provided by the Money Advice Team which was expanded to all residents provided by the Financial Inclusion team during the Covid-19 crisis. Home visits available by appointment.
Lancashire Citizens Advice Bureau	Skelmersdale	Part of national network of CABx – debt and money advice, food and fuel poverty – advice and referrals, benefits checks.
West Lancashire Debt Advice	Ormskirk	Debt advice delivered by Churches Together in Ormskirk – help with budgeting advice and work towards debt relief strategy. Contact through phone, messages, emails. Partner with Ormskirk Foodbank.
West Lancs ARK	Skelmersdale	Independent organisation providing advice, signposting and support including specific support for ex-offenders – budgeting, debt advice, housing, employment, training, drug and alcohol use.
SWLICAN (South West Lancashire Independent Community Advice Network)	Skelmersdale	Independent organisation providing advice – welfare, benefits, debt, low income, etc.
Hesketh Bank and Tarleton Helpers	Hesketh Bank and Tarleton	Faith and community group delivering food and picking up prescriptions etc, and supporting families in need during the Covid-19 crisis.
The Storehouse project (Wigan)	Skelmersdale Access in Greenhill Community Hub	Independent organisation that delivers food, furniture, baby items and other essentials to people in need.
Knowsley Credit Union	Skelmersdale access point two days a week	Financial co-operative providing access to affordable loans, savings, and insurance products to residents of West Lancashire, Knowsley, Liverpool, and Sefton.
Unify Credit Union	Remotely or via branches in Wigan, Leigh, Chorley, and Leyland	Financial co-operative providing access to affordable loans, savings, and insurance products to residents of Skelmersdale, Wigan, Leigh, Chorley, and Leyland.
Lancashire Community Finance	Skelmersdale and Burscough	Independent organisation providing money management and debt advice, advocacy, affordable loans. Dedicated Covid-19 helpline to provide expert money, benefits, housing, and debt advice.
Upholland Tawd Vale Lions	Skelmersdale	Independent organisation helping families with household goods and furniture – referrals from social services and other local groups.
Lancashire County Council Welfare Rights Service	-	Promotes benefit take-up and help people with benefit-related issues
Lancashire County Council Crisis Support	-	Crisis support scheme that helps with essential household furniture or white goods

As can be seen in the table above, a range of welfare advice and support services exist in West Lancashire. These services are predominantly located in Skelmersdale and to a lesser extent Ormskirk, although they are available to residents throughout the borough. For many residents, including those in the rural parts of West Lancashire, physical access to the services relies on travelling to the main towns, such as to Skelmersdale to access the CAB or Ormskirk to access West Lancashire Debt Advice. As noted earlier, access to services based in the two towns can be challenging when reliant on public transport. Home visits are available by appointment with WLBC's Money Advice Team.

WLBC is an integral part of the welfare support network in West Lancashire. The WLBC Money Advice Team was initially limited to support for Council tenants although access has been extended to all residents during the Covid-19 crisis with the establishment of the Financial Inclusion Team. The Money Advice/Financial Inclusion service includes budgeting and financial health checks, assistance with benefits applications including Universal Credit, debt advice and referral to the CAB where appropriate. The service can issue foodbank vouchers for those in need of emergency food aid. They can also refer to Lancashire County Council's crisis support scheme which can help people in need acquire essential household items. As noted above, home visits are available by appointment for those who cannot access the Council's offices in Skelmersdale or Ormskirk. Referrals and signposting are received from a range of organisations including the WLBC and County Council staff, police, fire service, health visitors and schools. The WLBC Money Advice team report a steady increase in council tenants seeking advice, rising from 128 in 2016 to 334 in 2019. Figures were not available for 2020 but anecdotally have increased greatly during the Covid-19 pandemic. In addition, WLBC's More Positive Together team is currently assessing support for people who are long-term unemployed, or have complex lives and multiple issues to support them back into employment through confidence building, CV writing, interview preparation, etc.

The other welfare services included in Table 7 were unable to provide up-to-date statistics on service users. However, several provided anecdotal information about changing level and type of need. For example, West Lancashire Debt Advice reported one-off events such a business closure can lead to redundancies and loss of income, while the numbers overstretching with car loans and credit cards can vary year by year. Generally, there are also cycles throughout the year, for example, when schools return after the summer holidays, the additional pressure of school uniform costs can push some families over the edge; council housing report increasing arrears at this time of year as well. Services reported demand for support had risen in recent years and this included a wider range of resident/family type which one consultee described as 'absolutely across the board'.

Several services reported that referrals regularly come in at a time of crisis. For example, consultees described seeing people who were in a 'really desperate' situation, 'robbing Peter to pay Paul', or having to make difficult decisions to 'heat or eat', feed the kids instead of themselves or get school uniform. The impacts on food insecurity were mentioned frequently with foodbank referrals used increasingly as part of the support offered. West Lancashire Debt Advice report that when people get into financial trouble, they tend to leave it late to get help, so that when they do ask for help, it is often with an issue that needs dealing with straight away such as bailiffs, county court judgement, or car parking fines. Sometimes, there is problem that is a legacy of better times, for example taking on an expensive car and then not being able to get out of a finance agreement or car loan when circumstances change. Services including West Lancashire

Debt Advice reported that maximising income through benefits checks or advice can make a significant difference to income, for example helping people to apply for benefits like PIP. Issues with tax credits discrepancies or other benefits mistakes and resultant sanctions are often a contributory factor to people's financial difficulties. Families with three children, only receiving benefits for two, being capped for under occupancy and having to make Council Tax contribution are all benefits-related issues that services highlighted as impacting on finances and contributing to food insecurity.

The Covid-19 pandemic has had a significant effect on demand for welfare support in West Lancashire. As well as referrals for people on benefits, several of the services we spoke to reported supporting more people in work, self-employed people and people on furlough during 2020. They added that referrals were being received from a range of statutory and third sector sources including various Council departments, as well as self-referrals. The consultees reported more acute crises and levels of poverty fuelled by reduced hours and pay or furlough. Most services reported supporting more people in work who were struggling financially, and some were concerned that people who have not needed welfare services before will leave it late to seek help or will simply not know where to go and how to access support.

The WLBC Money Advice service has seen an increase in the numbers of people in employment using their service, with the majority of the increase since Covid-19 in this category. Pre-Covid-19, it was rare for them to be supporting people in full-time employment whereas now this is around half of their caseload. The WLBC Money Advice team also reported that referral numbers were increasing and were now greater than at the start of the pandemic. The establishment of the Financial Inclusion Team had led to non-Council tenants being supported. The CAB also reported changing patterns of demand during the Covid-19 pandemic. Previously benefits issues were the most frequent cause of money troubles. Since the pandemic, the CAB reported seeing an increase in the self-employed, business owners, and those facing redundancy. Conversely, West Lancashire Debt Advice report that 2020 has been quieter, with less debt advice delivered and no foodbank referrals all year. They suggested this was perhaps because creditors were pursuing people less during the pandemic.

There was genuine concern among consultees that there will be longer term issues because of the impact of Covid-19 on incomes, even for people in employment. It is feared that debt issues will persist for a long time, especially for people not on benefits, who will need continued support to deal with the ongoing debt issues. Consultees also reported Covid-19 has resulted in pressure on relationships. They reported increasing numbers of people dealing with issues such as relationship breakdown and domestic violence, which can increase pressure on budgets and ability to buy food.

As noted in section 2, the wait for Universal Credit has been shown to be a major cause of financial hardship and a driver of food insecurity. Local services supported this view as they reported issuing rising numbers of food and fuel vouchers. The DWP has attempted to mitigate the situation and during the Covid-19 pandemic, Universal Credit was increased by £20 per week for recipients not limited by the cap. The planned removal of this temporary uplift has been widely criticised with commentators stating it will reduce household income of some of the most vulnerable families which could lead to an increase in debt and food insecurity. During the pandemic, as some of these services have started to use online vouchers, digital exclusion has become an issue for some people.

WLBC and West Lancashire CVS secured funding from DFERA to support people who had been financially impacted by the Covid-19 pandemic. The Emergency Assistance Grants up to the value of £150 for an individual and £250 per household were available to purchase food, essential supplies, essential household goods, removal expenses and housing debt to prevent immediate eviction. Access was via referrals from a range of public and third sector organisations, including schools. Some of those involved in the scheme reported it had been a great success reaching those in need and demonstrating the power of partnership working. This is a good example of the 'cash first' approach to financial crisis, as an alternative to emergency food aid, highlighted in section 3.

The Government allocated funding to all top-tier local authorities for Local Welfare Assistance Schemes. The funding was not ring-fenced and not all areas have an operational scheme. We have been unable to establish the status of the scheme in Lancashire. Crisis support does exist via the County Council to assist people in need to acquire essential household items. The CAB reported recent referrals they had made to this service had been unsuccessful.

This brief overview of welfare services in West Lancashire demonstrates that a range of support is provided by several organisations. However, it is our observation that co-ordination and co-operation is limited and we note the Financial Inclusion Strategy objectives include developing 'a borough-wide brand for services and key messages to promote awareness and improve access, use and signposting of existing and any new services' as well as providing 'a one door, multi-agency offer with access to other advice services so citizens facing financial hardship are supported at the right time and through an effective referral process'.

5 Opportunities to address food insecurity in West Lancashire

This section identifies potential opportunities to address food insecurity in West Lancashire. The opportunities have been informed by our initial consultation and mapping work in the borough, the workshop with local stakeholders which discussed emerging findings and possible actions, and our knowledge of initiatives in other areas. The costs of delivering these potential opportunities and the benefits that would be delivered are also summarised and assessed. Three broad opportunities are presented:

- Influencing policy at a national level.
- Strategic actions in West Lancashire.
- Local initiatives in West Lancashire.

Influencing policy at a national level

The evidence is clear that food insecurity is often the result of a household, quite simply, not having sufficient income. Alleviating poverty and food insecurity therefore, not surprisingly, include a strong focus on income maximisation and national policy. Consultees and the literature highlight the impact of welfare reform and the introduction of Universal Credit as critical factors in food insecurity. The same sources also highlight the impact of low pay and insecure employment. Several consultees encouraged WLBC and partners to continue to highlight the impact of these issues on food insecurity at a regional and national level. This included calls for the local authority to support the Trussell Trust's appeal for 'a national social security system which provides everyone with enough to keep them out of serious financial hardship and is responsive to individual needs and changing circumstances'.

Several other national opportunities were identified during the study. Some would require legislation whereas others would require improved financial support for local authorities to deliver. These opportunities include:

- Piloting a universal basic income scheme.
- Increasing the real living wage.
- Improvements to the Council Tax system including the removal of the under-occupation charge and reduction of proportion that people have to pay, especially for those on lowest incomes.
- Wider use of financial support such as school uniform grants.
- Tackling the issue of high interest loans and loan sharks.
- Rolling out a Healthy Start type initiative alongside Child Benefit.
- Investment in jobs and skills, including strengthening initiatives that enable local people to access job opportunities.

Strategic actions in West Lancashire

Three strategic actions in West Lancashire are recommended to help address food insecurity in the borough:

- Improved co-ordination and co-operation.
- Funding for organisations.
- Funding for individuals.

Improved co-ordination and co-operation

This study has shown numerous organisations are involved in delivering a range of activities to address food insecurity in West Lancashire. Connections, joint working and relationships among these organisations were generally good, and have strengthened in recent months via the Community Sector Open Forum meetings arranged to co-ordinate the response to the Covid-19 pandemic. However, overall West Lancashire’s collective response to tackling food insecurity could be more co-ordinated and joined-up, in our view. WLBC is well placed to provide a lead on this issue and improve co-ordination and we therefore recommend:

- A cross-sector food insecurity forum, led by WLBC, is created to strengthen ties and co-ordination.
- The forum commits to a sustainable and dignified approach to tackling food insecurity in West Lancashire.
- An existing senior officer from WLBC takes overall responsibility for co-ordinating West Lancashire’s response to tackling food insecurity.
- A WLBC councillor takes on the role of food security champion for West Lancashire providing political leadership at a local and national level.

WLBC representatives at the workshop indicated the Council would give due consideration to the above recommendations.

Funding for organisations in West Lancashire

The mapping exercise demonstrated that several organisations involved in tackling food insecurity are small, volunteer-led groups with limited capacity. In order to tackle food insecurity more effectively, they require additional resources. We therefore recommend WLBC, Lancashire County Council and West Lancashire CVS seek to provide additional resources – financial and in-kind – to help organisations improve their work to tackle food insecurity and poverty in a sustainable and dignified way.

Funding for individuals in West Lancashire

Section 2 demonstrated the close link between food insecurity and financial crisis, and highlighted recommendations in the literature for solutions to be based on tackling the root causes of food insecurity. For example, the Trussell Trust has called for ‘a safety net at the local level, which can be adapted and tailored to local needs and can provide flexible discretionary emergency support when people are at risk of falling through gaps in the national system. Local welfare assistance, whereby local authorities provide crisis support to people, is a fundamental part of this local safety net’. Although some emergency financial support is available in West Lancashire it is limited and several consultees suggested an expansion of hardship grants would have a positive impact on the numbers experiencing food insecurity in the area. The Emergency Assistance Grants available during the Covid-19 crisis demonstrated the value of additional targeted financial support and we therefore recommend that WLBC and partners seek to continue a scheme of this nature. Such a scheme would embrace the ‘cash first’ approach to tackling food insecurity highlighted in section 3.

Local initiatives in West Lancashire

The following local initiatives were identified during the study as potential opportunities to tackle food insecurity in West Lancashire:

1. A proactive, co-ordinated, **rapid response from services** that ensures anyone experiencing food insecurity in West Lancashire is effectively supported to tackle the

root causes of their food insecurity. This would involve early intervention by frontline services that encounter a person experiencing food insecurity who would be actively supported to receive the help they need, for example, to reduce debts, maximise income/benefits, access credit unions for low-cost loans, budget, learn cooking skills, or grow their own food. This would be an enhancement of the wraparound support that exists in an ad-hoc way at some services at present. It would also address the aims of the Borough's Financial Inclusion Strategy to provide accessible and timely support to people facing financial hardship. Some stakeholders at the workshop suggested partners should utilise local intelligence to focus on people who were most likely to be among the estimated 1,310 severely food insecure households in West Lancashire.

2. Development of **additional access points for emergency food parcel/foodbank** to address geographic gaps outside of Ormskirk and Skelmersdale and the limited opening times when current provision is inaccessible to those in emergency need.
3. **Extension of the community food shop network** including the rollout of joined-up services such as the Village Food Club that seek to address the underlying causes of food insecurity.
4. **Extension of the Café Birchwood approach** in other locations/communities across West Lancashire providing a dignified and engaging means of supporting people.
5. **Expansion of community growing spaces** and the **development of a scheme to use produce from the spaces and allotments**, including Burscough Community Farm, for the benefit of those experiencing food insecurity.
6. **Enhanced links with the local agricultural sector** to improve the supply of affordable, locally grown food to those experiencing food insecurity.
7. Work with local communities and retailers to **promote and encourage use of available third-party waste reduction approaches** such as the OLIO app, which enables free distribution of perishable foods to divert from landfill.

The costs of delivering these potential opportunities and the benefits that would be delivered are summarised below.

Costs of the potential opportunities

The costs of the specific opportunities cover any capital and revenue costs associated with developing the options. Table 8 summarises the costs associated with the delivery of each of the seven options presented above. In terms of capital costs, it is assumed that most of the options could be delivered from existing premises with minimal capital investment. This would include the sharing of some capital items e.g. transport. In terms of revenue costs, the cost of staff has been calculated and where volunteer hours are required, these have been valued using the national living wage (NLW). This is for information only, to highlight the important role that the voluntary sector plays in delivering the options.

The table shows that option 1 would, potentially, be the most costly option as we suggest it will require an additional employee and, given the need to drive the initiative forward, it is assumed the role would require a relatively experienced person. However, it is the option that most directly addresses the underlying causes of food insecurity rather than providing solutions to food insecurity and the benefits, presented in Table 9 reflect this.

Table 8 - Summary of requirements to deliver options and potential costs			
Option	Requirements	Potential capital costs	Revenue / In-kind requirements
Option 1	Rapid response service providing early intervention.	Based WLBC offices.	One FTE - £37,500 (including employers NI, pensions etc). Assumes basic salary of £30,000 to reflect relatively senior role required to oversee the service.
Option 2	a. One additional foodbank access point, possibly Burscough. b. Extended foodbank hours, additional 6 hours per week over evenings and weekend	a. Outreach by existing foodbank, using existing premises in Burscough or another northern village. Will require use of a vehicle for collection / distribution to site.	a. Open 4 hours per week, drawing from pool of 10 to 15 volunteers. Assume 3 to 4 volunteers per week. Approx. 20 volunteer hours per week equivalent to £9,300 p.a. at NLW. b. Evening hours: 2 hours, twice a week. Weekend hours: 2 hours. Draw from existing volunteers. Approx. 25-30 volunteer hours per week equivalent to £13,900 p.a. at NLW.
Option 3	Community food shops. Potential to link to Ormskirk and Skelmersdale foodbanks.	Use of premises, linked to foodbanks. Use of vehicle for collection of produce.	Assume membership model at £5 per week. Open 3 hours twice a week drawing from 15 to 20 volunteers. Volunteer hours are valued at £7,400 p.a. at NLW. 1 staff member (8 hours) could liaise/co-ordinate with foodbank. Cost estimated to be approx. £4,000 p.a.
Option 4	Provision of community café based on Café Birchwood model in Ormskirk or northern villages.	Use of suitable premises with catering facilities.	Income £3 per person, 35 covers per day, £10,500 p.a. Staff cost: chef (8 hours across 2 days) £4,200 p.a. Assume 10 volunteers for 3 hours each day at an equivalent cost of £27,800 at NLW.
Option 5	Community growing spaces.	Identification of suitable green spaces. Possible investment in equipment. Use of transport for delivery of produce.	PT employee to: identify/ develop new sites; co-ordinate volunteers (who may be from vulnerable groups/GP referrals); liaise with foodbanks/community shops to distribute produce. Employee could also develop Option 6. Cost approx. £20,000 (including employers NI, pension etc)
Option 6	Links with agricultural sector.		WLBC & partners to develop links with local agricultural sector to improve the supply of locally grown food to food initiatives. Development of scheme could be part of Option 5 employee remit.
Option 7	Promote waste reduction.		WLBC & partners to promote use of third party food reduction Apps. Promotional material. Undertaken by existing WLBC staff.

Options 2 to 4 provide access to food on either an emergency basis (Option 2) or at a reduced cost (Options 3 and 4). There are a small number of part-time hours involved in Options 3 and 4, but all three of these options are primarily delivered by volunteers. Options 3 and 4 each have estimated staff costs of approximately £4,000 per annum, but these are modest costs compared to the volunteer hours required to deliver the options.

Options 5 and 6 are related to growing initiatives and they could potentially share a part-time employee. Both options deliver locally grown produce and, while this should be encouraged, the volume of produce is likely only be able to make a small contribution to food insecurity. Option 5 however, has the potential to link into other local initiatives and has the potential to create volunteering opportunities for disadvantaged and vulnerable people.

Option 7 has no real costs as it is essentially the promotion of “food apps” which could be included in WLBC promotional material or through its website.

Benefits of the potential opportunities

All the options identified have the potential to help address food insecurity in Wets Lancashire. Option 1 is designed to directly address the underlying causes of food security by providing benefits advice, debt reduction advice etc. The other options provide access to food and dietary/lifestyle advice. The benefits associated with the opportunities are primarily assessed on a qualitative basis, through their contribution to strategic objectives. Drawing on the review of West Lancashire policy in Section 3 the following strategic objectives are considered relevant to the assessment:

- Financial Inclusion:
 - Enable partners, agencies and stakeholders to work together to deliver relevant and supportive financial inclusion services i.e. provision of advice or support to move away from poverty
 - Provision of emergency food or subsidised food to reduce reliance on foodbanks
- Health and Wellbeing:
 - Develop community food initiatives to provide:
 - Advice on growing/consuming healthy food
 - Access to healthier food
 - Contribute to improved mental health
- Social Inclusion:
 - Reduction in social isolation
- Sustainability:
 - Reduce food waste sent to landfill

The contribution to strategic objectives is assessed using a scale where a ★ indicates that an option delivers against the objective. The number of ★ represents the extent to which an option contributes to the strategic objectives with ★★★ representing the maximum contribution. Given that food insecurity is primarily driven by poverty and financial inequalities, the strategic objectives have been weighted; the delivery of financial inclusion services has been given a weighting of 2 in the assessment to reflect its importance.

Table 9 sets out the assessment of the contribution of the options to the strategic objectives. It is assumed that anyone accessing Options 2 (foodbanks) and 3 (community shops) will be referred to the financial inclusion services provided under Option 1. Option 4 is the only option which delivers against at least one objective within each of the four strategic objectives.

The options delivering the highest level of benefits are Options 1 (rapid response from services) and 4 (extending the community café model). These are closely followed by Options 2 (extending access to foodbanks), 3 (additional community shops) and 5 (community growing).

While delivering one of the highest levels of benefits, Option 1 also has the highest cost. However, it is an option which is seeking to deliver a longer term solution to food insecurity and for this reason, it is prioritised as a key initiative.

Option 4 scores highly on the assessment of benefits, but its contribution to the financial inclusion objectives is slightly less than Options 2 and 3 as its benefits derive more from the health and wellbeing objectives.

Options 2, 3 and 5 have the same benefit score but, as with option 4, Option 5 derives most of its benefits from the health and wellbeing objectives while Options 2 and 3 are very focused on providing immediate access to food.

Table 9 - Contribution of options to strategic objectives							
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Financial Inclusion							
- Delivery of financial inclusion services (weighted x2)	★★★	★	★	-	-	-	-
- Provision of emergency/ subsidised food	-	★★★	★★★	★★	★	-	-
Health and Wellbeing							
- Provide advice to grow/consume healthy food	★	-	-	★	★	-	-
- Provide access to healthier food	-	★	★	★★	★★	★★	-
- Enhance mental health	★★	★	★	★	★★	-	-
Social Inclusion							
Reduce social isolation	-	-	-	★★	★★	-	-
Sustainability							
Reduce food waste sent to landfill	-	★	★	★	-	-	★★★
Total contribution to objectives	6	7	7	9	8	2	3
Weighted contribution to objectives	9	8	8	9	8	2	3

6 Conclusions

This comprehensive study provides West Lancashire Borough Council and partner organisations with valuable information on food insecurity in West Lancs. It presents robust evidence on the nature and extent of food insecurity in the Borough, including up-to-date evidence regarding the impact of Covid-19. It also mapped and assessed the support that currently exists to tackle food insecurity in West Lancashire which helped identify potential opportunities to develop support further in the future.

Using national evidence, the study estimated that approximately 4,600 households in West Lancashire experienced food insecurity prior to the Covid-19 pandemic, including approximately 1,300 households that experienced severe food insecurity. The situation has undoubtedly worsened during the pandemic with national evidence suggesting the numbers experiencing food insecurity and accessing foodbanks increased by up to 90%. The study found that the chances of being food insecure were higher among low-income households, lone-parent households, single working-age adult households, renters particularly social renters, unemployed people, younger people aged 16 to 24, and people affected by ill-health. Foodbanks have become the most recognised means of supporting people experiencing food insecurity and national figures suggest, prior to the pandemic, 2% of UK households had used a foodbank, the average number of foodbank visits over a year was 2.6, and the profile of foodbank users was broadly similar to those experiencing food insecurity. The main reason people are referred to foodbanks is linked to the benefits system, with other important drivers identified as debt, addiction, challenging life experiences such as eviction or divorce, adverse work-related experiences such as losing a job or reduced hours, ill-health or a disability, and a lack of informal support from friends and family. Locally, over 4,100 people were fed by Skelmersdale and Ormskirk Foodbanks in 2020, including over 1,700 children. This was an increase of 37% from 2019 with a greater number of families with children seeking help during 2020. Evidence was also presented that food insecurity tends to lead to a less healthy and nutritious diet which can be associated with a range of physical and mental health issues.

The study identified a range of initiatives nationally to try to address food insecurity including emergency food parcels/foodbanks, community food shops, community kitchens and cafés, community growing projects, and support to develop practical cooking skills. Our mapping exercise established that all of the above exist in West Lancashire to varying degrees. Key support includes three established foodbanks that provide emergency food parcels, the innovative Café Birchwood and other community cafés, three community food shops including the Village Food Hub, and a network of welfare support providers. The mapping exercise also highlighted gaps including a concentration of support in Skelmersdale and to a lesser extent Ormskirk, as well as limited co-ordination between services to join-up support to tackle the root causes of food insecurity.

Looking to the future and trying to address food insecurity in West Lancashire, the study identified a number of opportunities at the national and local levels. Although national issues such as welfare reform and income maximisation are beyond the remit of WLBC and local partners, they have the potential to make a significant difference to tackling the underlying causes of food insecurity and we recommend partners continue to lobby for action. In the absence of such fundamental change, food insecurity is likely to continue and WLBC and partners are therefore encouraged to act on the other opportunities identified during the study and

presented in section 5 of this report to improve co-ordination and the delivery of support to people experiencing food insecurity in West Lancashire. An assessment of the costs and benefits of the potential opportunities suggests that a proactive, co-ordinated, rapid response from services that ensures anyone experiencing food insecurity in West Lancashire is effectively supported to tackle the root causes of their food insecurity has the potential to make the greatest impact.

It is hoped the findings of this report assist West Lancashire and partner organisations with their continued efforts to tackle food insecurity in West Lancs.

Appendix

Food insecurity

For these statements, please tell me whether the statement was OFTEN true, SOMETIMES true, or NEVER true for your household in the last 12 months.

1. “We worried whether our food would run out before we got money to buy more.” Was that OFTEN, SOMETIMES, or NEVER true for you in the last 12 months?
2. “The food that we bought just didn’t last, and we didn’t have money to get more.” Was that OFTEN, SOMETIMES, or NEVER true for you in the last 12 months?
3. “We couldn’t afford to eat balanced meals.” Was that OFTEN, SOMETIMES, or NEVER true for you in the last 12 months?
4. In the last 12 months, did you or other adults in the household ever cut the size of your meals or skip meals, because there wasn’t enough money for food? (Yes/No)
5. (If yes to question 4) How often did this happen - almost every month, some months but not every month, or in only one or two months?
6. In the last 12 months, did you ever eat less than you felt you should, because there wasn’t enough money for food? (Yes/No)
7. In the last 12 months, were you ever hungry, but didn’t eat, because there wasn’t enough money for food? (Yes/No)
8. In the last 12 months, did you lose weight, because there wasn’t enough money for food? (Yes/No)
9. In the last 12 months, did you or other adults in your household ever not eat for a whole day, because there wasn’t enough money for food? (Yes/No)
10. (If yes to question 9) How often did this happen - almost every month, some months but not every month, or in only one or two months?

Destitution

People were defined as destitute if they lacked two or more of the following six essentials over the past month because they could not afford them (the ‘destitution on essentials’ criterion), or their income was so low (less than £10 per day for a single person after housing costs) that they were unable to purchase these essentials for themselves (the ‘destitution on income’ criterion):

1. Shelter (have slept rough for one or more nights).
2. Food (have had fewer than two meals a day for two or more days).
3. Heating their home (have been unable to do this for five or more days).
4. Lighting their home (have been unable to do this for five or more days).
5. Appropriate clothing and footwear.
6. Basic toiletries (soap, shampoo, toothpaste, toothbrush).

Source: Sosenko F, Littlewood M, Bramley G. [A State of Hunger. A study of poverty and food insecurity in the UK](#). The Trussel Trust: 2019.

Equality Impact Assessment Form



Directorate:	Service:
Completed by: Peter Morrison	Date: 4 October 2021
Subject Title: Food Insecurity	
1. DESCRIPTION	
Is a policy or strategy being produced or revised:	No <i>*delete as appropriate</i>
Is a service being designed, redesigned or cutback:	No
Is a commissioning plan or contract specification being developed:	No
Is a budget being set or funding allocated:	No
Is a programme or project being planned:	Yes
Are recommendations being presented to senior managers and/or Councillors:	Yes
Does the activity contribute to meeting our duties under the Equality Act 2010 and Public Sector Equality Duty (Eliminating unlawful discrimination/harassment, advancing equality of opportunity, fostering good relations):	Yes
Details of the matter under consideration:	Consider implementing actions from a research study into food insecurity in West Lancashire.
<p><i>If you answered Yes to any of the above go straight to Section 3</i></p> <p><i>If you answered No to all the above please complete Section 2</i></p>	
2. RELEVANCE	
Does the work being carried out impact on service users, staff or Councillors (stakeholders):	Yes/No* <i>*delete as appropriate</i>
If Yes , provide details of how this impacts on service users, staff or Councillors (stakeholders): <i>If you answered Yes go to Section 3</i>	
If you answered No to both Sections 1 and 2 provide details of why there is no impact on these three groups: <i>You do not need to complete the rest of this form.</i>	
3. EVIDENCE COLLECTION	
Who does the work being carried out impact on, i.e. who is/are the stakeholder(s)?	Residents of the borough
If the work being carried out relates to a universal service, who needs or uses it most? (Is there any particular group affected more than others)?	Food insecurity can affect all groups

Which of the protected characteristics are most relevant to the work being carried out?	<i>*delete as appropriate</i>
Age	No
Gender	No
Disability	No
Race and Culture	No
Sexual Orientation	No
Religion or Belief	No
Gender Reassignment	No
Marriage and Civil Partnership	No
Pregnancy and Maternity	No
4. DATA ANALYSIS	
In relation to the work being carried out, and the service/function in question, who is actually or currently using the service and why?	Residents who are struggling financially
What will the impact of the work being carried out be on usage/the stakeholders?	A co-ordinated / dignified approach which will help deal with the root causes of food insecurity
What are people's views about the services? Are some customers more satisfied than others, and if so what are the reasons? Can these be affected by the proposals?	Currently there are some gaps in accessing support due to current provision and geography, it is expected that these gaps will be considered further with a view to addressing them
What sources of data including consultation results have you used to analyse the impact of the work being carried out on users/stakeholders with protected characteristics?	Research study carried out by consultants used to ascertain issues affecting residents experiencing food insecurity
If any further data/consultation is needed and is to be gathered, please specify:	None
5. IMPACT OF DECISIONS	
In what way will the changes impact on people with particular protected characteristics (either positively or negatively or in terms of disproportionate impact)?	The changes should support all residents who are experiencing food insecurity
6. CONSIDERING THE IMPACT	
If there is a negative impact what action can be taken to mitigate it? (If it is not possible or desirable to take actions to reduce the impact, explain why this is the case (e.g. legislative or financial drivers etc.).	N/A
What actions do you plan to take to address any other issues above?	No Actions
7. MONITORING AND REVIEWING	
When will this assessment be reviewed and who will	Annually - Cross sector food insecurity forum

review it?	
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**EXECUTIVE OVERVIEW &
SCRUTINY COMMITTEE:**
21 October 2021

CABINET: 2 November 2021

Report of: Corporate Director of Place & Community

Relevant Portfolio Holder: Councillor Gareth Dowling

Contact for further information: Mrs Laura Lea (Extn.5196)
(E-mail: laura.lea@westlancs.gov.uk)

SUBJECT: MINIMUM ENERGY EFFICIENCY STANDARD ENFORCEMENT POLICY

Wards affected: Borough wide

1.0 PURPOSE OF THE REPORT

1.1 To consider and agree the Minimum Energy Efficiency Standard Enforcement Policy.

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW & SCRUTINY

2.1 That the Minimum Energy Efficiency Standard Enforcement Policy attached at Appendix 1 be put before Cabinet to be approved.

2.2 That any agreed comments be referred to Cabinet.

3.0 RECOMMENDATIONS TO CABINET

3.1 That the Minimum Energy Efficiency Standard Enforcement Policy attached at Appendix 1 be approved.

3.2 That any comments from Executive Overview & Scrutiny be considered and agreed.

3.3 That the Corporate Director of Place & Community, in consultation with the relevant Portfolio Holder, be authorised to amend the policy considering any legislative or guidance changes.

3.4 That the Corporate Director of Place & Community, in consultation with the relevant Portfolio Holder, be authorised to review and change the level of financial penalties issued as required.

3.5 That the Corporate Director of Place & Community, in consultation with the relevant Portfolio Holder, be authorised to amend the current Private Sector Housing Enforcement Policy, originally approved by Cabinet, to include the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (the Regulations) (as amended).

4.0 BACKGROUND

4.1 The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (the Regulations), first came into force on the 1 April 2018 but were amended in 2020. The Regulations were brought in to tackle the least energy efficient private rented properties in England and Wales.

4.3 The Regulations set out the minimum level of energy efficiency for private rented properties in England & Wales, known as the Domestic Minimum Energy Efficiency Standard (MEES).

4.4 The Council will be the enforcing authority and can serve financial penalties where the landlord is found to be in breach of the Regulations.

5.0 APPLICATION OF THE REGULATIONS

5.1 The Regulations first came into force on the 1 April 2018 and were amended in 2020. Since 1 April 2018, landlords must not have granted a tenancy to new or existing tenants if the property had an energy performance certificate (EPC) rating of F or G. Since 1 April 2020, landlords must not continue to let a property which is already let if it has an EPC rating of F or G, unless a valid exemption is in place.

5.2 The Regulations apply to all domestic private rented properties that are:

- let on either an assured tenancy (including assured shorthold tenancies), a regulated tenancy (defined in the Rent Act 1977) or a domestic agricultural tenancy (i.e. an assured agricultural tenancy under s.24 Housing Act 1988, a protected occupancy under s.3(6) of the Rent (Agriculture) Act 1976, a statutory tenancy under s.4(6) Rent (Agriculture) Act 1976);
- legally required to have an Energy Performance Certificate (EPC)

5.3 The Regulations do not apply to social housing tenancies.

5.4 Where a property is legally obliged to have an EPC, it will meet the MEES if from either 1 April 2018 or 1 April 2020, it has a valid EPC that shows an energy rating of E or above. If it has a rating of F or G, it will be defined as sub-standard and in breach of the Regulations.

6.0 FUNDING IMPROVEMENTS

6.1 In order to improve the EPC rating of a property, a landlord can make 'relevant energy efficiency improvements'. Such improvements will be listed in the EPC report, a surveyors report or a Green Deal Advice Report.

- 6.2 An improvement will only be a relevant improvement if:
- third-party funding is available to cover the full cost of purchasing and installing the improvement(s); or
 - where third-party funding is unavailable, the improvement(s) can be purchased and installed for £3,500 or less (inclusive of VAT) using the landlord's own funding; or
 - the improvement(s) can be installed through a combination of landlord self-funding and third-party funding with a total cost of £3,500 or less (inclusive of VAT).
- 6.3 Landlords are not required to spend more than £3,500 including VAT on energy efficiency improvements.
- 6.4 If a property's EPC rating cannot be improved to at least an E rating for £3,500 or less, improvements up to that value should still be made and then an 'all improvements made' exemption should be registered.
- 6.5 Funding options are available to landlords and include third party funding e.g. Energy Company Obligation, Local Authority Grants, Green deal finance, self-funding or a combination of third part and self-funding.

7.0 EXEMPTIONS

- 7.1 There are various exemptions that apply to the prohibition on letting a property with an energy efficiency rating below E. If a property meets the criteria for any of the exemptions, the landlord will be able to let it once an exemption has been registered on the PRS Exemptions Register.

8.0 ENFORCEMENT & FINANCIAL PENALTIES

- 8.1 The Regulations will be enforced by the Council. If it is believed that a landlord has breached the Regulations, a compliance notice will be served. If a breach is confirmed, a financial penalty will be issued.
- 8.2 The compliance notice can be served up to 12 months after a suspected breach occurred. This means that a person can be served a notice even if they are no longer the landlord.
- 8.3 If a breach is confirmed, a financial penalty can be served up to 18 months after the breach. The levels of financial penalties can be found at Appendix 2 to the Policy.
- 8.4 The Council can also publish details of the breach on the publicly accessible part of the PRS Exemptions Register and will remain on the Register for at least 12 months.

9.0 RIGHTS OF APPEAL

- 9.1 Landlords can ask the Council to review the decision to serve a penalty notice. If the decision is upheld, landlords can appeal to the First-Tier Tribunal.

10.0 SUSTAINABILITY IMPLICATIONS

10.1 The introduction of the Regulations will result in an improvement in the quality of the Borough's private rented housing stock by ensuring the landlords do everything they can to improve the energy efficiency of their properties.

11.0 FINANCIAL AND RESOURCE IMPLICATIONS

11.1 The introduction of these Regulations will have an impact on resources. There is currently only 1 FTE post within the Private Sector Housing Team that is responsible for enforcement. A further FTE equivalent post will be needed to ensure the Council can meet its legal obligations under these and other new Regulations recently introduced.

11.2 There are financial implications due to the need for another FTE Enforcement Officer post. Whilst income can be generated through the imposition of financial penalties, enforcement is always a last resort and voluntary compliance is always preferred.

12.0 RISK ASSESSMENT

12.1 The Regulations provide an opportunity by increasing the powers available to the Council to ensure the continuous improvement of the Borough's private rented housing stock.

12.2 Failure to adequately carry out these functions is a breach of the Regulations and this presents a risk to the Council.

13.0 HEALTH AND WELLBEING IMPLICATIONS

13.0 The proposal will empower people in vulnerable, deprived and disadvantaged communities to realise their full health potential by ensuring their homes are safe and warm.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

There is a direct impact on members of the public, employees, elected members and / or stakeholders, therefore an Equality Impact Assessment is required. A formal equality impact assessment is attached as an Appendix to this report, the results of which have been taken into account in the Recommendations contained within this report

Appendices

1. Minimum Energy Efficiency Standard Enforcement Policy
2. Equality Impact Assessment
3. Minute of Executive Overview & Scrutiny Committee – 21 October 2021 (Cabinet only)



**PRIVATE SECTOR HOUSING
MINIMUM ENERGY EFFICIENCY STANDARD
ENFORCEMENT POLICY**

1.0 Introduction

- 1.1 The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (the Regulations) (as amended) were brought in to tackle the least energy efficient private rented properties in England and Wales.
- 1.2 The Regulations set out the minimum level of energy efficiency for private rented properties in England & Wales, known as the Domestic Minimum Energy Efficiency Standard (MEES).
- 1.3 Under MEES, since 1 April 2018, landlords of relevant domestic rented properties must not have granted a tenancy to new or existing tenants if the property has an energy performance certificate (EPC) rating of F or G.
- 1.4 Since 1 April 2020, landlords must not continue letting a relevant domestic property which is already let if that property has an EPC rating of F or G, unless a valid exemption is in place. The exemption must be registered before the property is let. If the property is already being let, the landlord must take immediate action to improve the EPC rating or register an exemption.
- 1.5 MEES applies to all domestic private rented properties that are:
 - let on either an assured tenancy (including assured shorthold tenancies), a regulated tenancy (defined in the Rent Act 1977) or a domestic agricultural tenancy (i.e. an assured agricultural tenancy under s.24 Housing Act 1988, a protected occupancy under s.3(6) of the Rent (Agriculture) Act 1976, a statutory tenancy under s.4(6) Rent (Agriculture) Act 1976);
 - legally required to have an Energy Performance Certificate (EPC)
- 1.6 MEES does not apply to social housing tenancies even if they are let on one of the tenancy types above.
- 1.7 Where a domestic private rented property is legally required to have an EPC and is let on a tenancy type described above, it will meet the minimum standard if, from either the 1 April 2018 or 1 April 2020, it has a valid EPC which shows that the energy efficiency rating for the property is E or above. In these cases, the landlord will not be required to take any action.
- 1.8 If MEES applies and the property has an EPC rating of F or G, it will be defined as sub-standard and non-compliant with the Regulations. The landlord must take steps to comply with the regulations by carrying out works to bring the rating up to at least an E rating or by registering an exemption on the PRS Exemptions Register.

2.0 Energy Performance Certificates

- 2.1 Alongside tenancy type considerations, the Regulations only apply to those domestic properties which are legally required to have an EPC. This means properties required to have an EPC by any of the following:

- The Energy Performance of Buildings (Certificates and Inspections) (England and Wales) Regulations 2007
 - The Building Regulations 2010
 - The Energy Performance of Buildings (England and Wales) Regulations 2012
- 2.2 Since 2008, an owner or landlord has, on sale, letting or construction of a property, been required to make an EPC available to the prospective buyer or tenant.
- 2.3 Where an EPC is legally required for a property, not having one is unlawful and could be subject to non-compliance penalties. Trading Standards are responsible for enforcing the Regulations that require an EPC to be made available. An owner or landlord may be fined if they fail to make an EPC available to any prospective buyer or tenant.
- 2.4 Since October 2015, where a landlord hasn't provided an assured shorthold tenant with an EPC, he or she won't be able to evict them using a section 21 notice, the so-called "no fault" eviction procedure.
- 2.5 Where a property already has a valid EPC, this EPC can be retrieved from the Domestic Energy Performance Certificate Register (unless the owner has opted out of the EPC register). When produced, an EPC will also be accompanied by a recommendations report setting out any energy efficiency measures which may be suitable for installation in the property.
- 2.6 Once an EPC is lodged on the EPC register (the EPC assessor is responsible for ensuring this happens) it is valid for a period of ten years. A new EPC is not required each time there is a change of tenancy (or even when the property is sold), provided the earlier certificate is no more than ten years old. An owner, landlord or tenant will be free to commission a further EPC within that ten-year period if they choose.
- 2.7 Once an EPC reaches the ten-year point and expires, there is no automatic requirement for a new one to be commissioned. A further EPC will only be required the next time a trigger point is reached, i.e. when the property is next sold, let to a new tenant, or modified.
- 2.8 There is also no requirement to produce a new EPC after carrying out energy efficiency improvement works to comply with the Regulations. However, for the purposes of the Regulations, it is recommended that landlords do commission a fresh, post installation EPC. A new EPC will reflect the improvements made, alongside any change to the energy efficiency rating of the property. A post installation EPC will, in all likelihood, be the easiest way for a landlord to demonstrate that they have complied with the Regulations.
- 2.9 EPCs relate to the property rather than to the owner or occupier and remain valid irrespective of the owner. Therefore, an EPC obtained by a previous owner of the property will remain valid after a property is sold on, so long as it is less than ten years old.

3.0 Multi-Let Buildings

- 3.1 Buildings that contain multiple self-contained units let to different tenants may have multiple EPCs covering various parts of the building. There may also be a separate EPC relating to the envelope of the building as a whole.
- 3.2 For the purposes of MEES, the minimum EPC requirement is linked to the “property” being let which can be either a “whole building or part of a building”. In cases where the property being let is a discrete unit within a building (for example a room in a house share which is rented out on an individual basis), rather than the entire building, and where there is an EPC for the entire building, but also one for the discrete space being let, then the relevant EPC will be the one for the discrete space.
- 3.3 Where there is only an EPC for the entire building (and where an EPC for the discrete space is not legally required) then that whole-building EPC will be the relevant EPC. The landlord, then, should identify which EPC relates to the “property” that is subject to the relevant tenancy (or tenancies) and take action to improve the energy efficiency rating to the minimum standard, if necessary.
- 3.4 A landlord should seek independent legal advice if they are in any doubt about which EPC is required. As the relevant EPC will be the one related to the property being let, the landlord will only be required to install relevant measures which improve the energy performance of that property. In some cases, measures installed to improve the energy efficiency of a discrete space may also improve the energy efficiency of other spaces or units within a multi-let building. This is entirely acceptable.

4.0 Circumstances where an EPC may not be required

- 4.1 Guidance issued by the Ministry of Housing, Communities and Local Government (MHCLG) notes that an EPC is not required where the landlord (or the seller, if relevant) can demonstrate that the building is any of the following:
- a building that is officially protected as part of a designated environment or because of their special architectural or historic merit where compliance with certain minimum energy efficiency requirements would unacceptably alter their character or appearance
 - a building used as places of worship and for religious activities
 - a temporary building with a planned time of use of two years or less
 - Industrial sites, workshops, non-residential agricultural buildings with low energy demand and non-residential agricultural buildings which are in use by a sector covered by a national sectorial agreement on energy performance
 - stand-alone buildings with a total useful floor area of less than 50m² (i.e. buildings entirely detached from any other building)
 - HMO's (Houses in Multiple Occupation, for example these can be bedsits, hostels, shared houses etc) which have not been subject to a sale in the previous ten years, or which have not been let as a single rental in the past ten years

- 4.2 A building will also not need an EPC where the landlord can demonstrate that it is furnished holiday accommodation as defined by HMRC and the holidaymaker is not responsible for meeting the energy costs.
- 4.3 Under certain circumstances buildings may also be exempt from the requirement to obtain an EPC where it may be demonstrated that they are to be demolished. This is subject to a number of strict conditions as set out in regulation 8 of the Energy Performance of Buildings (England and Wales) Regulations 2012.
- 4.4 There are no other exceptions to the EPC obligations although there may be some transactions which do not qualify as a sale or a letting. If in doubt, legal advice should be sought.

5.0 Voluntary EPCs obtained for properties which are not legally required to have one

- 5.1 In situations where an owner or occupier of a building which is not legally required to have an EPC has obtained one voluntarily (i.e. a voluntary EPC for a property which has not been sold, let or modified within the past ten years), the landlord will not be required to comply with the minimum standard Regulations (and no exemption will be necessary, as the minimum standard Regulations will not apply to that property).
- 5.2 A voluntary EPC may be registered on the official EPC database, but there is no requirement to do so. Where a voluntary EPC has been registered on the database it will supersede any earlier EPC that may have existed for the property, but official registration of a voluntary EPC will not, in itself, require the landlord to comply with the minimum standard.
- 5.3 However, if having acquired a voluntary EPC for a property they let, a landlord subsequently markets that property for let, that act will trigger the legal requirement for the property to have an EPC (and the EPC details will need to be displayed as part of the marketing material for that property). The landlord will be able to use the voluntarily obtained EPC to market the property (so long as the EPC is less than 10 years old), and the fact that the property is now legally required to have an EPC will mean that the property will now be covered by the MEES even though the EPC was initially obtained on a voluntary basis.

6.0 Subletting a domestic private rented property

- 6.1 The responsibility for not letting a domestic property below EPC E applies to any person who lets, or proposes to let, a domestic private rented property.
- 6.2 If the original tenancy allows a tenant to sublet the property and that tenant proposes to enter into a sub-tenancy as a new landlord to a sub-tenant, then that original tenant/new landlord should not let the property until the minimum standard is reached, or until a valid exemption has been registered.

- 6.3 In the case of subletting, an original tenant/new landlord may (subject to the terms of their tenancy) need to obtain consent from their superior landlord before making improvements to meet the minimum standard.
- 6.4 From 1 April 2020, there is a continuing obligation on all domestic landlords to ensure the requirements of the Regulations are met (even where there has been no change or renewal of a tenancy), so the superior landlord should have already taken steps to improve a property to E before a post April 2020 subletting occurs.

7.0 Mixed use properties and tenancy types

- 7.1 The MEES Regulations apply to rented properties that comprise of a mix of residential and commercial units e.g. a building with shops on the ground floor and residential flats above. The triggers for the application of the Regulations will depend on whether particular units are domestic or non-domestic.
- 7.2. Where such a property falls below an EPC rating of E, the landlord will need to examine the tenancy to determine whether the property is domestic or non-domestic for the purposes of the Regulations, and whether it is required to comply with the minimum standard, and if so, by which trigger date.
- 7.3 Where a mixed-use property is rented on an assured tenancy (including an assured shorthold tenancy) for the purposes of the Housing Act 1988, a regulated tenancy under the Rent Act 1977, or a domestic agricultural tenancy under the Energy Efficiency (Domestic Private Rented Property) Order 2015, then it is likely to be considered a domestic property and should be treated accordingly.
- 7.4 If a privately rented property is let under a tenancy but is not considered a “dwelling”, then it will be considered a non-domestic private rented property for the purposes of the Regulations and will need to comply with the minimum standards in accordance with the non-domestic trigger dates.
- 7.5 In all cases it will be for the landlord to check their tenancy arrangements to understand what type of tenancy is in place, and they should seek appropriate legal advice if there is any uncertainty as to whether a property falls within the domestic or non-domestic category.

8.0 Funding Improvements

- 8.1 For the purposes of the Regulations, “relevant energy efficiency improvements” which a landlord may choose to install to enable a sub-standard property to reach EPC E (either a single measure, or a combination of measures as appropriate) are any energy efficiency improvements recommended for the property through any of the following:
- an energy efficiency recommendations report (including the recommendations report accompanying a valid EPC)
 - a report prepared by a surveyor

- a Green Deal Advice Report
- 8.2 A recommended energy efficiency measure will only be a “relevant energy efficiency improvement” for the purposes of the Regulations if:
- third-party funding is available to cover the full cost of purchasing and installing the improvement(s); or
 - where third-party funding is unavailable, the improvement(s) can be purchased and installed for £3,500 or less (inclusive of VAT) using the landlord’s own funding; or
 - the improvement(s) can be installed through a combination of landlord self-funding and third-party funding with a total cost of £3,500 or less (inclusive of VAT).
- 8.3 Landlords will not be required to spend more than £3,500 including VAT on energy efficiency improvements.
- 8.4 If a landlord cannot improve their property to an E rating for £3,500 or less, improvements up to that value should still be made then an 'all improvements made' exemption should be registered.
- 8.5 Landlords can find further advice via the Simple Energy Advice website www.simpleenergyadvice.org.uk
- 8.6 There are 3 ways landlords can fund the improvements to their property:

Option 1: Third party funding

If a landlord secures third-party funding to cover the full cost of improving the property to EPC E:

- the cost cap does **not** apply
- the landlord should make use of all the funding secured to get the property to band E, or if possible higher.

Funding options can include:

- Energy Company Obligation (ECO)
- Local authority grants
- Green deal finance

Option 2: Combination of third-party funding and self-funding

If third-party funding is secured but it is:

- less than £3,500, and
- not enough to improve the property to EPC E

The landlord may need to top up with their own funds to the value of the cost cap.

Any energy efficiency investments made to the property since 1 October 2017 can be counted towards the cost cap. If the property can be improved to and E rating for less than £3,500, that is all that needs to be spent.

Option 3: Self-funding

If a landlord is unable to secure any funding, they will need to use their own funds to improve the property. The landlord will never need to spend more than the cost cap of £3,500.

If the property can be improved to EPC E for less than £3,500, the obligation will be met.

If it would cost more than £3,500 to improve the property to E, the landlord should install all recommended measures that can be installed within that amount, then register an exemption.

If the landlord has made any energy efficiency improvements to the property since 1 October 2017, the cost of those improvements can be included within the £3,500 cost cap.

9.0 Selecting energy efficiency measures

- 9.1 The EPC report will include a list of recommendations detailing measures which should improve the energy efficiency of the property. It will include both a short list of top actions that can be taken, and a more detailed list further down setting out all recommended measures. The recommendations will help the landlord choose which measure or combination of measures to install.
- 9.2 Landlords are free to install any energy efficiency measure(s), but if the chosen improvements do not appear in the list of 'recommended energy efficiency improvements' and they fail to improve the property to EPC E, the landlord will not be able to let the property or register an 'all relevant improvements made' exemption. The landlord will then need to make further attempts to improve the rating to a minimum of E, in order to let the property.

10.0 Exemptions

- 10.1 There are various exemptions that apply to the prohibition on letting a property with an energy efficiency rating below E. If a property meets the criteria for any of the exemptions, the landlord will be able to let it once the exemption has been registered on the PRS Exemptions Register.
- 10.2 Any exemptions from the prohibition on letting sub-standard property which are claimed by a landlord may not pass over to a new owner or landlord upon sale or other transfer of that property. If a let property is sold or otherwise

transferred with an exemption in place, the exemption will cease to be effective and the new owner will need to either improve the property to the minimum standard at that point, or register an exemption themselves where one applies, if they intend to continue to let the property.

10.3 The exemptions are as follows:

10.4 **All relevant improvements made exemption**

This exemption is for properties that are either still rated below E after improvements have been made up to the cost of £3,500 or where there are no improvements that can be made. The exemption lasts for 5 years. On expiry, the landlord must try again to improve the EPC rating. If this is still not possible, a further exemption can be registered.

10.5 **High cost exemption**

This exemption is for properties that cannot be improved because the cost of installing even the cheapest recommended measure would exceed £3,500. This exemption lasts 5 years. On expiry, the landlord must try again to improve the EPC rating. If this is still not possible, a further exemption can be registered.

10.6 **Wall insulation exemption**

This exemption is for properties where the only relevant improvements are cavity wall insulation, external wall insulation or internal wall insulation for internal walls and there is written expert advice showing that these measures would negatively impact the fabric or structure of the property or the building of which it is part. The exemption lasts 5 years. On expiry, the landlord must try again to improve the EPC rating. If this is still not possible, a further exemption can be registered.

10.7 **Third-party consent exemption**

This exemption is for properties where consent is needed from another party for the works to be carried out and despite best efforts, consent cannot be obtained or is given subject to conditions that cannot be reasonably complied with. The exemption lasts for 5 years or where the lack of consent was due to the tenant refusing to let the works be carried out, until the current tenancy ends or is assigned to a new tenant. On expiry, the landlord must try again to improve the rating or register another exemption.

10.8 **Property devaluation exemption**

This is for properties where there is evidence to show that by making energy efficiency improvements, the property would be devalued by more than 5%. In order to register this exemption, a report will be required from an independent surveyor. The exemption lasts for 5 years. On expiry, the landlord should try

again to improve the rating. If this is not possible, another exemption should be registered.

10.9 Temporary exemption due to recently becoming a landlord

If a person has recently become a landlord under certain circumstances, he/she can register a 6 month exemption from the date they became a landlord. On expiry of the exemption, the landlord must have either improved the EPC rating to at least E or registered another valid exemption (if one applies).

11.0 Enforcement and penalties

11.1 The MEES Regulations will be enforced by the Council and there are a range of powers in place to check and ensure compliance.

11.2 If the Council believes a landlord has failed to fulfil their obligations under the Regulations, they may be served with a compliance notice. If a breach is confirmed, the landlord may be issued with a financial penalty.

11.3 The Council will check for different forms of non-compliance, including one or more of the following:

- from 1 April 2018, the landlord let their property in breach of the Regulations
- from 1 April 2020, the landlord continued to let the property in breach of the Regulations
- the landlord has registered false or misleading information on the PRS Exemptions Register

12.0 Compliance notices

12.1 If the Council believes a landlord may be in breach of the Regulations, a compliance notice may be served requesting information to help decide whether a breach has occurred. The compliance notice can be served up to 12 months after a suspected breach occurred.

12.2 The ability to serve a compliance notice on a landlord up to 12 months after the suspected breach means that a person may be served with a notice after they have ceased to be the landlord of the property. Therefore, the Council recommends that landlords retain any records and documents that can demonstrate compliance with the Regulations, even after they are no longer the landlord.

12.3 Any notice served must be in writing and may be sent in hard copy or electronically.

- 12.4 Where a notice is served on a corporate body, it may be given to the company secretary if a suitable named individual cannot be identified.
- 12.5 Where a notice is served on a partnership, it may be addressed to any partner or to a person who has control or management of the partnership business.
- 12.6 A compliance notice may request information on:
- the EPC that was valid for the time when the property was let
 - the tenancy agreement used for letting the property
 - information on any energy efficiency improvements made
 - any Energy Advice Report in relation to the property
 - any other relevant document
- 12.7 The compliance notice may also require the landlord to register copies of the requested information on the PRS Exemptions Register.
- 12.8 The compliance notice will specify:
- the name and address of the person that a landlord must send the requested information to
 - the date by which the requested information must be supplied (the notice must give the landlord at least one calendar month to comply)
- 12.9 The landlord must comply with the compliance notice by sending the requested information to the Council and allow copies of any original documents to be taken. Failure to provide documents or information requested by a compliance notice, or failure to register information on the PRS Exemptions Register as required by a compliance notice, may result in a penalty notice being served.
- 12.10 The Council may withdraw or amend the compliance notice at any time in writing, for example where new information comes to light. The Council may also use the documents provided by the landlord or any other information it holds to decide whether the landlord is in breach of the Regulations.

13.0 Penalties

- 13.1 If the Council confirms that a property is (or has been) let in breach of the Regulations, a financial penalty may be served up to 18 months after the breach. The Council may also publish details of the breach for at least 12 months.
- 13.2 The Council can decide on the level of the penalty, up to maximum limits set by the Regulations. The financial penalties are set out in Appendix 2.
- 13.3 The maximum penalty amounts apply per property and per breach of the Regulations. They are:

- a) up to £2,000 and/or publication penalty for renting out a non-compliant property for less than 3 months
- b) up to £4,000 and/or publication penalty for renting out a non-compliant property for 3 months or more
- c) up to £1,000 and/or publication for providing false or misleading information on the PRS Exemptions Register
- d) up to £2,000 and/or publication for failure to comply with a compliance notice

13.4 The Council cannot impose a financial penalty under both a) & b) in relation to the same breach but can either under a) or b) together with c) & d) in relation to the same breach.

13.5 Where penalties are imposed under more than one of a - d above, the maximum amount the Council can fine a landlord per property and per breach is £5,000 in total.

14.0 Publication Penalty

14.1 A publication penalty means that the Council will publish some details of the landlord's breach on a publicly accessible part of the PRS Exemptions Register. The Council can decide how long to leave the information on the Register, but it will be available for view by the public for at least 12 months.

14.2 The information that the Council may publish is:

- the landlord's name (except where the landlord is an individual)
- details of the breach
- the address of the property in relation to which the breach occurred; and
- the amount of any financial penalty imposed.

14.3 The Council may decide how much of this information to publish, however, the Council may not place this information on the PRS Exemptions Register while the penalty notice could be, or is being reviewed or while their decision to uphold the penalty notice could be or is being appealed.

15.0 Circumstances in which a penalty notice may be served

15.1 The Council may serve a penalty notice (relating to a financial penalty, a publication penalty or both) on the landlord where they are satisfied that the landlord is, or has been in the last 18 months:

- in breach of the prohibition on letting sub-standard property (which may include continuing to let the property after 1 April 2020)
- in breach of the requirement to comply with a compliance notice
- has uploaded false or misleading information to the Exemptions Register.

15.2 The fact that the Council may serve a penalty notice on a landlord up to 18 months after the suspected breach means that a person may be served with a penalty notice after they have ceased to be the landlord of a property.

16.0 What will be included in a penalty notice

16.1 The penalty notice may include a financial penalty, a publication penalty or both. The penalty notice will:

- explain which of the provisions of the Regulations the Council believes the landlord has breached
- give details of the breach
- tell the landlord whether they must take any action to remedy the breach and, if so, the date within which this action must be taken (the date must be at least a month after the penalty notice is issued)
- explain whether a financial penalty is imposed and if so, how much and, where applicable, how it has been calculated
- explain whether a publication penalty has been imposed
- where a financial penalty is imposed, tell the landlord the date by which payment must be made, the name and address of the person to whom it must be paid and the method of payment (the date must be at least a month after the penalty notice is issued)
- explain the review and appeals processes, including the name and address of the person to whom a review request must be sent, and the date by which the request must be sent; and
- explain that if the landlord does not pay any financial penalty within the specified period, the Council may bring court proceedings to recover the money from the landlord

16.2 A further penalty notice may be issued if the action required in the penalty notice is not taken in the time specified.

16.3 When the Council issues a penalty notice which carries a right of appeal, they must tell the landlord about that right of appeal.

17.0 Circumstances in which a penalty notice may be reviewed or withdrawn

17.1 The Council may decide to review its decision to serve a penalty notice, for example when new information comes to light.

17.2 A landlord also has the right to ask the Council to review its decision to serve a penalty notice. This request must be made in writing. The penalty notice must tell the landlord how long they have to make this request, and who it must be sent to. When the Council receives the request, it must consider

everything the landlord has said in the request and decide whether or not to withdraw the penalty notice.

17.3 The Council must withdraw the penalty notice if:

- it is satisfied that the landlord has not committed the breach set out in the penalty notice
- although it is still believe the landlord committed the breach, it is satisfied that the landlord took all reasonable steps and exercised all due diligence to avoid committing the breach; or
- it decides that because of the circumstances of the landlord's case, it was not appropriate for the penalty notice to be served

17.4 If the Council does not decide to withdraw the penalty notice, it might decide to waive or reduce the penalty, allow the landlord additional time to pay, or modify the publication penalty, and must explain the appeals process and how financial penalties can be recovered.

17.5 The Council must inform the landlord of their decision in writing and will do so at the earliest opportunity.

18.0 Recovery of financial penalties

18.1 If a landlord does not pay a financial penalty imposed on them, the Council may take the landlord to court to recover the money.

18.2 The Council may not take the landlord to court to recover the money:

- a) during the period in which the landlord could ask the Council to review their decision to serve the penalty notice, or while they are reviewing their decision to serve the penalty notice; or
- b) during the period in which the landlord could appeal to the First-tier Tribunal, or while there is an ongoing appeal to the First-tier Tribunal, against the penalty notice

19.0 Appeals to the First-tier Tribunal (General Regulatory Chamber)

19.1 The First-tier Tribunal (General Regulatory Chamber) is administered by Her Majesty's Courts and Tribunals Service and is the home for a range of rights of appeal.

19.2 Where a landlord asks the Council to review a decision to serve a penalty notice and on review the decision is upheld, the landlord may then appeal to the First-tier Tribunal against that decision if they think that:

- the penalty notice was based on an error of fact or an error of law

- the penalty notice does not comply with a requirement imposed by the Regulations; or
- it was inappropriate to serve a penalty notice on them in the particular circumstances.

19.3 If a landlord does appeal, the penalty notice will not have effect while the appeal is ongoing. A landlord may also wish to seek legal advice as part of considering or making an appeal if they have not already done so.

Appendix 1

MEEES Enforcement Process

Stage 1 Check to see if the regulations apply by following the guidance at: [Domestic private rented property: minimum energy efficiency standard - landlord guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/private-rented-sector-minimum-energy-efficiency-standard-exemptions/guidance-on-prs-exemptions-and-exemptions-register-evidence-requirements)

Stage 2 Check to see if an exemption has been registered: <https://www.gov.uk/government/publications/private-rented-sector-minimum-energy-efficiency-standard-exemptions/guidance-on-prs-exemptions-and-exemptions-register-evidence-requirements>

If the landlord may be in breach, move to Stage 3.

Stage 3 Serve a compliance notice

The compliance notice must be served within 12 months of the offence. The compliance notice may request the following:

- the EPC that was valid for the time when the property was let
- the tenancy agreement used for letting the property
- information on any energy efficiency improvements made
- any Energy Advice Report in relation to the property
- any other relevant document

The notice can also require the landlord to register copies of the requested information on the PRS Exemptions Register. The notice must specify:

- the name and address of the person that a landlord must send the requested information to
- the date by which the requested information must be supplied (the notice must give the landlord at least one calendar month to comply)

The notice must give the landlord at least 1 month to comply.

Stage 4 Serve a penalty notice

If it is confirmed that the landlord is in breach of one or more of the Regulations (or has been at any time within the last 18 months preceding the date on the penalty notice), a penalty notice may be served.

Where the landlord fails to take the action required by the penalty notice within the period specified, a further penalty notice can be issued.

The penalty notice can include both a financial penalty and a publication penalty.

Stage 5 Publication Penalty

Publication Penalty means registering the penalty charge and landlord's details on the PRS Exemptions Register. The publication cannot be done until:

- the period requesting a review has expired;
- where a review has been requested, the Council has served notice of its decision; or
- where an appeal is made, until the appeal has been determined.

When registering the penalty charge on the PRS Exemptions Register, the following information may be included:

- the landlords name (except where the landlord is an individual)
- details of the breach
- the address of the property where the breach occurred
- the amount of any financial penalty imposed

Appendix 2**Financial Penalty Levels**

	Offence	Financial Penalty	Publication Penalty
A	Renting out non-compliant property for less than 3 months	£500	Y
B	Renting out non-compliant property for 3 – 6 months	£1,000	Y
	Renting out non-compliant property for 6 months or more	£2,000	Y
C	Providing false or misleading information on the PRS Exemptions Register	£500	Y
D	Failure to comply with a compliance notice	£1,000	Y

A financial penalty cannot be imposed under A & B for the same breach. E.g. non-compliant property has been rented out for 6 months, breaching both A & B. Only one penalty can be applied. The decision will be, does the penalty get issued under A or B. If the landlord has also provided false or misleading information and failed to comply with a compliance notice, a financial penalty can be issued under either A or B plus under C & D.

Where financial penalties are imposed due to more than one breach on the same property, the maximum amount the Council can fine the landlord per property is £5,000.

If the total number of penalties per property amounts to more than £5,000, the overall all penalty should be reduced to £5,000 in discussion with the Homelessness & Private Sector Housing Manager.

Equality Impact Assessment Form



Directorate: Place & Community		Service: Homelessness & Private Sector Housing	
Completed by: Laura Lea		Date: 7 September 2021	
Subject Title: Minimum Energy Efficiency Standard Enforcement Policy			
1. DESCRIPTION			
Is a policy or strategy being produced or revised:	Yes	<i>*delete as appropriate</i>	
Is a service being designed, redesigned or cutback:	No		
Is a commissioning plan or contract specification being developed:	No		
Is a budget being set or funding allocated:	No		
Is a programme or project being planned:	No		
Are recommendations being presented to senior managers and/or Councillors:	Yes		
Does the activity contribute to meeting our duties under the Equality Act 2010 and Public Sector Equality Duty (Eliminating unlawful discrimination/harassment, advancing equality of opportunity, fostering good relations):	Yes		
Details of the matter under consideration:	The Minimum Energy Efficiency Standard Enforcement Policy has been produced following the introduction of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (the Regulations) as amended.		
<p><i>If you answered Yes to any of the above go straight to Section 3</i> <i>If you answered No to all the above please complete Section 2</i></p>			
2. RELEVANCE			
Does the work being carried out impact on service users, staff or Councillors (stakeholders):	Yes/No*	<i>*delete as appropriate</i>	
If Yes , provide details of how this impacts on service users, staff or Councillors (stakeholders): <i>If you answered Yes go to Section 3</i>			
If you answered No to both Sections 1 and 2 provide details of why there is no impact on these three groups: <i>You do not need to complete the rest of this form.</i>			
3. EVIDENCE COLLECTION			
Who does the work being carried out impact on, i.e. who is/are the stakeholder(s)?	Private sector landlords and tenants		
If the work being carried out relates to a universal service, who needs or uses it most? (Is there any particular group affected more than others)?	Private sector landlords and tenants		

Which of the protected characteristics are most relevant to the work being carried out?	<i>*delete as appropriate</i>
Age	Yes
Gender	No
Disability	Yes
Race and Culture	Yes
Sexual Orientation	No
Religion or Belief	No
Gender Reassignment	No
Marriage and Civil Partnership	No
Pregnancy and Maternity	No
4. DATA ANALYSIS	
In relation to the work being carried out, and the service/function in question, who is actually or currently using the service and why?	Private sector tenants
What will the impact of the work being carried out be on usage/the stakeholders?	There will be a financial impact on landlords in regards to the new obligations. There will be a positive impact on private sector tenants as they will see an improvement in the standard of their property especially in relation energy efficiency.
What are people's views about the services? Are some customers more satisfied than others, and if so what are the reasons? Can these be affected by the proposals?	N/A
What sources of data including consultation results have you used to analyse the impact of the work being carried out on users/stakeholders with protected characteristics?	N/A
If any further data/consultation is needed and is to be gathered, please specify:	None
5. IMPACT OF DECISIONS	
In what way will the changes impact on people with particular protected characteristics (either positively or negatively or in terms of disproportionate impact)?	There will be a positive impact on private sector tenants as they will see an improvement in the standard of their property especially in relation to energy efficiency.
6. CONSIDERING THE IMPACT	
If there is a negative impact what action can be taken to mitigate it? (If it is not possible or desirable to take actions to reduce the impact, explain why this is the case (e.g. legislative or financial drivers etc.).	N/A
What actions do you plan to take to address any other issues above?	No actions <i>If no actions are planned state no actions</i>
7. MONITORING AND REVIEWING	
When will this assessment be reviewed and who will review it?	Laura Lea September 2022



**EXECUTIVE OVERVIEW &
SCRUTINY COMMITTEE:
21 October 2021**

CABINET: 2 November 2021

Report of: Corporate Director of Place & Community

Relevant Portfolio Holder: Councillor Gareth Dowling

**Contact for further information: Mrs Laura Lea (Extn.5196)
(E-mail: laura.lea@westlancs.gov.uk)**

SUBJECT: PRIVATE RENTED SECTOR ELECTRICAL SAFETY POLICY 2021

Wards affected: Borough wide

1.0 PURPOSE OF THE REPORT

1.1 To consider and agree the Private Rented Sector Electrical Safety Policy 2021.

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW & SCRUTINY

2.1 That the Private Rented Sector Electrical Safety Policy 2021 attached at Appendix 1 be put before Cabinet to be approved.

2.2 That any agreed comments be referred to Cabinet.

3.0 RECOMMENDATIONS TO CABINET

3.1 That the Private Rented Sector Electrical Safety Policy 2021 attached at Appendix 1 be approved.

3.2 That any comments from Executive Overview & Scrutiny be considered and agreed.

3.3 That the Corporate Director of Place & Community, in consultation with the relevant Portfolio Holder, be authorised to amend the policy considering any legislative or guidance changes.

3.4 That the Corporate Director of Place & Community, in consultation with the relevant Portfolio Holder, be authorised to review and change the level of financial penalties issued as required.

- 3.5 That the Corporate Director of Place & Community, in consultation with the relevant Portfolio Holder, be authorised to amend the current Private Sector Housing Enforcement Policy, originally approved by Cabinet, to include the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
-

4.0 BACKGROUND

- 4.1 The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020, came into force on the 1 June 2020. The purpose of the Regulations is to improve safety in all residential premises, particularly in the private rented sector.
- 4.3 The Regulations mean that all private landlords are now legally required to make sure that all electrical installations in their rented properties are inspected and tested by a qualified person at least every 5 years. Copies of all safety reports must also be provided to the tenant or any potential tenant as well as to the Council if requested.
- 4.4 The Council will be the enforcing authority and has powers to require landlords to carry out vital remedial works, carry out works in default and recover any costs from the landlord and serve financial penalties for non-compliance.

5.0 APPLICATION OF THE REGULATIONS

- 5.1 The Regulations came into force on the 1 June 2020 and as of the 1 April 2021, they apply to all private rented tenancies and licences to occupy.
- 5.2 The Regulations will also apply to houses in multiple occupation (HMOs) if the property is the tenants only or main residence and they pay rent. For licensable HMOs, the Regulations require a new mandatory condition to be inserted into the licence covering the need to ensure every electrical installation is in proper working order and safe for continued use.
- 5.2 The Regulations do not apply to:
- Social housing tenancies
 - Lodgers (where the tenant shares the property with the landlord or a member of the landlord's family)
 - Long leases
 - A tenancy that grants a right of occupation for a term of 7 years or more
 - Student halls of residence
 - Hostels or refuges

6.0 LANDLORD OBLIGATIONS

- 6.1 Under the Regulations, landlords must:

- Ensure national standards for electrical safety are met as set out in the 18th Edition of the Wiring Regulations (published as British Standard 7671)
- Ensure all electrical installations in their rented properties are inspected and tested by a qualified and competent person at least every 5 years
- Obtain a report from the person conducting the inspection and test which gives the results and sets a date for the next inspection and test
- Supply a copy of the report to the existing tenant within 28 days of the inspection and test
- Supply a copy of the report to a new tenant before they occupy the premises
- Supply a copy of the report to any prospective tenant within 28 days of receiving a request for the report
- Supply the Council with a copy of the report within 7 days of receiving a written request for a copy
- Retain a copy of the report to give to the inspector and tester who will undertake the next inspection and test
- Where the report shows that further investigative or remedial work is necessary, complete this work within 28 days or any shorter period if specified as necessary in the report
- Supply written confirmation of the completion of the further investigative or remedial works from the electrician to the tenant and the Council within 28 days of the completion of the works

6.2 A report will contain the following classification codes:

- Code 1 (C1): Danger present, risk of injury
- Code 2 (C2): Potentially dangerous
- Further Investigation (FI): Further investigation required without delay
- Code 3 (C3): Improvement recommended (further remedial work is not required for the report to be deemed satisfactory)

6.3 If the report contains a code C1, C2 or FI, the landlord must ensure that further investigative or remedial work is carried out by a qualified person within 28 days or less if specified in the report.

7.0 ENFORCEMENT

7.1 Where the Council is satisfied on the balance of probabilities that a landlord has not complied with one or more of their duties under the Regulations, a Remedial Notice must be served within 21 days of that decision.

7.2 If the landlord is in breach and the report has indicated that urgent remedial action is required, the Council can, with the consent of the tenant, arrange for the necessary works to be carried out and recover any costs from the landlord.

7.3 If the Council does not intend to arrange for the works to be carried out, a Remedial Notice will be served requiring the landlord to complete the works within 28 days.

8.0 FINANCIAL PENALTIES

- 8.1 The Council can issue a financial penalty to a landlord that fails to comply with the Regulations. The levels of financial penalties that can be levied can be found at Appendix 1 in the policy.

9.0 RIGHTS OF APPEAL

- 9.1 Landlords have the right to make written representations to the Council against any remedial action that is proposed. Remedial notices must be appealed within 21 days of the notice being served while the imposition of a financial penalty must be appealed within 28 days.
- 9.2 Landlords have a further right of appeal to the First-Tier Tribunal. The Tribunal may confirm, quash or vary any notice served by the Council.

10.0 SUSTAINABILITY IMPLICATIONS

- 10.1 The introduction of the Regulations will result in an improvement in the quality of the Borough's private rented housing stock by making it a legal requirement to carry out electrical tests on a 5 yearly basis.

11.0 FINANCIAL AND RESOURCE IMPLICATIONS

- 11.1 The introduction of these Regulations will have an impact on resources. There is currently only 1 FTE post within the Private Sector Housing Team that is responsible for enforcement. A further FTE equivalent post will be needed to ensure the Council can meet its legal obligations under these and other new Regulations recently introduced.
- 11.2 There are financial implications due to the need for another FTE Enforcement Officer post. Whilst income can be generated through the imposition of financial penalties, enforcement is always a last resort and voluntary compliance is always preferred.

12.0 RISK ASSESSMENT

- 12.1 The Regulations provide an opportunity by increasing the powers available to the Council to ensure the continuous improvement of the Borough's private rented housing stock.
- 12.2 Failure to adequately carry out these functions is a breach of the Regulations and this presents a risk to the Council.

13.0 HEALTH AND WELLBEING IMPLICATIONS

- 13.0 The proposal will empower people in vulnerable, deprived and disadvantaged communities to realise their full health potential by ensuring their homes are safe and secure.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

There is a direct impact on members of the public, employees, elected members and / or stakeholders, therefore an Equality Impact Assessment is required. A formal equality impact assessment is attached as an Appendix to this report, the results of which have been taken into account in the Recommendations contained within this report

Appendices

1. Private Rented Sector Electrical Safety Policy 2021
2. Equality Impact Assessment
3. Minute of Executive Overview & Scrutiny Committee – 21 October 2021 (Cabinet only)



PRIVATE RENTED SECTOR ELECTRICAL SAFETY POLICY 2021

1.0 INTRODUCTION

- 1.1 The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 came into force on the 1 June 2020. The purpose of the Regulations is to improve safety in all residential premises, particularly in the private rented sector.
- 1.2 Existing legislation already requires landlords to keep their properties free from electrical hazards and it has previously been best practice for landlords to organise periodic inspection and testing and to provide an electrical safety report to the tenant.
- 1.3 The Regulations put existing best practice on a statutory footing with all landlords now being legally required to make sure the electrical installations in their rented properties are safe by having them inspected and tested by a qualified and competent person, at least every 5 years. A copy of the safety report should be provided to the tenant and if requested, to the Council.
- 1.4 Under the Regulations, the Council has the power to require landlords to carry out vital remedial works or arrange for the works to be carried out directly and recover the cost from the landlord. Landlords who don't comply can be served with a financial penalty.

2.0 APPLICATION OF THE REGULATIONS

- 2.1 The regulations came into force on 1 June 2020 and they apply to new tenancies from 1 July 2020 and existing tenancies from 1 April 2021. The relevant date for determining when the new requirements apply is the date on which the tenancy is granted. A new tenancy is one that was granted on or after 1 June 2020.
- 2.2 If a private tenant has a right to occupy a property as their only or main residence and pays rent, then the Regulations apply. This includes assured shorthold tenancies and licences to occupy.
- 2.3 The Regulations do not apply to:
 - Social housing tenancies
 - Lodgers (where the tenant shares the property with the landlord or a member of the landlord's family)
 - Long leases
 - A tenancy that grants a right of occupation for a term of 7 years or more
 - Student halls of residence
 - Hostels or refuges
- 2.4 Houses in multiple occupation (HMOs) are covered by the Regulations if the property is the tenant's only or main residence and they pay rent.
- 2.5 HMOs with 5 or more tenants must have a licence. The Regulations amend the Housing Act 2004 to require a new mandatory condition in the HMO

licence to ensure that every electrical installation is in proper working order and safe for continued use.

2.6 The Regulations do not cover electrical appliances, only the fixed electrical installations such as the wiring, plug sockets, light fittings and consumer unit.

3.0 LANDLORD OBLIGATIONS

3.1 Under the Regulations, landlords must:

- Ensure national standards for electrical safety are met as set out in the 18th Edition of the Wiring Regulations (published as British Standard 7671)
- Ensure all electrical installations in their rented properties are inspected and tested by a qualified and competent person at least every 5 years
- Obtain a report from the person conducting the inspection and test which gives the results and sets a date for the next inspection and test
- Supply a copy of the report to the existing tenant within 28 days of the inspection and test
- Supply a copy of the report to a new tenant before they occupy the premises
- Supply a copy of the report to any prospective tenant within 28 days of receiving a request for the report
- Supply the Council with a copy of the report within 7 days of receiving a written request for a copy
- Retain a copy of the report to give to the inspector and tester who will undertake the next inspection and test
- Where the report shows that further investigative or remedial work is necessary, complete this work within 28 days or any shorter period if specified as necessary in the report
- Supply written confirmation of the completion of the further investigative or remedial works from the electrician to the tenant and the Council within 28 days of the completion of the works

3.2 A report will contain the following classification codes:

- Code 1 (C1): Danger present, risk of injury
- Code 2 (C2): Potentially dangerous
- Further Investigation (FI): Further investigation required without delay
- Code 3 (C3): Improvement recommended (further remedial work is not required for the report to be deemed satisfactory)

3.3 If the report contains a code C1, C2 or FI, the landlord must ensure that further investigative or remedial work is carried out by a qualified person within 28 days or less if specified in the report.

3.4 Landlords can ensure a person is qualified and competent by checking if the inspector is a member of a competent person scheme or by requiring the inspector to sign a checklist certifying their competence, including their experience, whether they have adequate insurance and hold a qualification

covering the current version of the Wiring Regulations and the periodic inspection, testing and certification of electrical installations.

4.0 ENFORCEMENT

- 4.1 Where the Council is satisfied on the balance of probabilities that a landlord has not complied with one or more of their duties under the Regulations, a Remedial Notice must be served within 21 days of the decision that the landlord has not complied with their duties.
- 4.2 Where the Council is satisfied that the landlord is in breach and the report indicates urgent remedial action is required, the Council can, with the consent of the tenant or tenants, arrange for the necessary works to be carried out and recover any costs from the landlord.
- 4.3 Where the Council does not intend to arrange the works, the Remedial Notice served will require the landlord to carry out the necessary works within 28 days. If the landlord does not comply with the Notice, the Council may, with the tenant or tenant's consent, arrange for the works to be carried out and recover any costs from the landlord.

5.0 REMEDIAL NOTICE

- 5.1 The Remedial Notice will:
 - Specify the premises to which the notice relates
 - Specify what the Council believes the landlord has failed to do
 - Specify what needs to be done
 - Require the landlord to take action within 28 days from the day the notice is served
 - Explain the landlord's right to make written representations within 21 days of the notice being served
 - Specify the person, address or email that representations should be sent to
 - Explain provisions about financial penalties and rights of appeal
- 5.2 A landlord will not be in breach of the duty to comply with a remedial notice if they can show they have taken all reasonable steps to comply.
- 5.3 Landlord should keep copies of all communications with their tenants and electricians as they try to arrange to carry out the work including any replies they have had.
- 5.4 If a landlord has been prevented from accessing the premises by the tenant, they will not be required to take legal proceedings against them in order to show that all reasonable steps have been taken to comply with their duties.
- 5.5 Landlords should also keep any evidence they have that shows the electrical installation is in a good condition while they attempt to arrange the works. This could include the servicing record and previous condition reports.

6.0 REMEDIAL ACTION

- 6.1 The Council may, with the consent of the tenant or tenants, arrange to carry out remedial work in the following circumstances:
- If a landlord does not comply with a remedial notice
 - If the report indicates that urgent remedial action is required and the landlord has not carried this out within the period specified in the report
- 6.2 Where the Council authorises and carried out the remedial works, a qualified and competent person will be appointed.
- 6.3 The Regulations require that the authorised person must give at least 48 hours' notice to the tenant. They may be asked by the tenant and the landlord to produce evidence of their identity and a letter from the local housing authority confirming their authority to carry out the required works.
- 6.4 The Council will recover the costs incurred from the landlord.

7.0 REMEDIAL ACTION FOLLOWING NON-COMPLIANCE WITH A REMEDIAL NOTICE

- 7.1 Where the Council intends to carry out the remedial work following the landlord's non-compliance with the Remedial Notice, the landlord will be notified in writing. The notification will specify:
- The address of the property where the work will be undertaken
 - The power under which the remedial action is to be taken
 - The date when the remedial action will be undertaken (at least 28 days from the date served)
 - The right of appeal against this decision
- 7.2 The Council will arrange for the works to be carried out within 28 days of the end of the notice period unless the landlord appeals. Where there is an appeal, the works will be arranged within 28 days of the appeal decision confirming or varying the Council's decision.
- 7.3 As already stated, the landlord will not be in breach of the duty to comply with the Remedial Notice served if they can show they have taken all reasonable steps to comply.

8.0 URGENT REMEDIAL ACTION

- 8.1 Where the Council has arranged for urgent remedial action to be carried out, the landlord will be notified of this within 7 days of the works starting. The Council will:
- Serve a notice on the landlord and all occupiers of the premises in relation to which the works are being carried out; or
 - Fix a notice to the premises

8.2 The notice will state:

- What action is going to be undertaken
- The address of the property where the action will be undertaken
- The legal power
- The date when that urgent remedial action was or will be started
- The rights of appeal and the period of time within which an appeal may be made
- Details of any financial penalty and the right of appeal against the financial penalty

9.0 FINANCIAL PENALTIES

9.1 The Council can impose a financial penalty on a landlord where they have failed to comply with the Regulations.

9.2 The process for issuing a financial penalty can be found in the Civil Penalties Charging Policy and at Appendix 2.

9.3 The levels of financial penalty that will be levied by the Council can be found at Appendix 1.

10.0 RIGHT TO MAKE WRITTEN REPRESENTATIONS

10.1 In the first instance, landlords have the right to make written representation and appeal against any remedial action that is proposed.

10.2 Remedial notices must be appealed within 21 days of the notice being served.

10.3 The imposition of a financial penalty must be appealed within 28 days.

10.4 The Council has 7 days to respond to any written representations received.

10.5 Landlords then have the right of appeal to the First-tier Tribunal. The Tribunal may confirm, quash or vary notices served by the local housing authority.

11.0 RIGHT OF APPEAL AGAINST REMEDIAL ACTION

11.1 A landlord can appeal to the First-Tier Tribunal within 28 days from the day the Remedial Notice is served. The Tribunal may allow an appeal to be made after this date if it is satisfied that there are good reasons for the failure to appeal on time.

11.2 A landlord can appeal on the grounds that all reasonable steps had been taken to comply or reasonable progress had been made towards compliance when the notice was served.

11.3 If an appeal is lodged, the remedial notice is suspended until the appeal is finally determined or withdrawn.

12.0 APPEALS AGAINST URGENT REMEDIAL ACTION

12.1 A landlord can appeal to the First-Tier Tribunal within 28 days from the date the urgent remedial action was or was to be started.

12.2 A landlord can appeal on the grounds that all reasonable steps had been taken to comply or reasonable progress had been made towards compliance when the urgent remedial action started.

13.0 APPEALS AGAINST DEMANDS FOR THE RECOVERY OF COSTS

13.1 Any appeal against a demand for the recovery of costs must be made within 21 days from the day the demand was served.

13.2 Landlords can appeal on the grounds that all reasonable steps had been taken to comply or reasonable progress had been made towards compliance with the notice when the Council gave notice of their intention to enter and take the remedial action.

14.0 APPEALS AGAINST A FINANCIAL PENALTY

14.1 Any appeal must be made within 28 days beginning with the day after the day the final notice to impose a financial penalty was served.

14.2 Landlords can appeal the decision to impose the penalty or the amount of the penalty.

14.3 On appeal the final notice is suspended until the appeal is determined or withdrawn.

Appendix 1

Offence	Civil Penalty	
Failure to ensure all electrical installations have been inspected and tested by a qualified and competent person at least every 5 years	1 st Offence	£3,000
	2 nd Offence	£6,000
	Subsequent offences by same person/company	£15,000
Failure to obtain a report from the person conducting the inspection and test which gives the results and sets a date for the next inspection and test	1 st Offence	£1,000
	2 nd Offence	£2,000
	Subsequent offences by same person/company	£3,000
Failure to supply a copy of the inspection report to the existing tenant within 28 days of the inspection and test	1 st Offence	£500
	2 nd Offence	£1,000
	Subsequent offences by same person/company	£1,500
Failure to supply a copy of the inspection report to a new tenant before they occupy the premises	1 st Offence	£500
	2 nd Offence	£1,000
	Subsequent offences by same person/company	£1,500
Failure to supply a copy of the inspection report to any prospective tenant within 28 days of receiving a request for the report	1 st Offence	£500
	2 nd Offence	£1,000
	Subsequent offences by same person/company	£1,500
Failure to supply the local housing authority with a copy of this report within 7 days of receiving a written request for a copy	1 st Offence	£1,000
	2 nd Offence	£2,000
	Subsequent offences by same person/company	£3,000

Failure to retain a copy of the report to give to the inspector and tester who will undertake the next inspection and test	1 st Offence	£1,000
	2 nd Offence	£2,000
	Subsequent offences by same person/company	£3,000
Where the report shows that further investigative or remedial work is necessary, failure to complete this work within 28 days or any shorter period if specified as necessary in the report	1 st Offence	£5,000
	2 nd Offence	£10,000
	Subsequent offences by same person/company	£20,000
Failure to supply written confirmation of the completion of the further investigative or remedial works from the electrician to the tenant and the local housing authority within 28 days of completion of the works	1 st Offence	£1,000
	2 nd Offence	£2,000
	Subsequent offences by same person/company	£3,000

Appendix 2

Enforcement Procedure

Step 1 Request a copy of the most recent electrical inspection report

The landlord will be required to supply a copy of the most recent report to the Council within 7 days of the request being made. The request to the landlord must be in writing, this can be by letter or email.

Step 2 Consider whether urgent remedial action should be taken

If the report shows that urgent remedial action is required and the landlord has not carried this out within the period specified in the report, a decision must be made as to whether the Council should arrange for the works to be completed.

If the works are to be arranged, the landlord must be notified of this within 7 days of the work starting.

Draft an Urgent Remedial Action Notice and serve this on the landlord and all occupiers of the property. A copy of the notice must also be fixed to the property.

Step 3 Serve a Remedial Notice

If the Council is satisfied on the balance of probabilities that the landlord has not complied with one or more of their duties under the Regulations, and urgent remedial action is not being carried out, a Remedial Notice must be served on the landlord within 21 days of the decision that the landlord has not complied. The notice will require the landlord to undertake the necessary works within 28 days.

Step 4 Non-compliance with a Remedial Notice

If the landlord does not comply with the Remedial Notice, a decision should be made as to whether the Council will arrange for the works to be done. If the decision is yes, serve a Remedial Action Notice. The work cannot begin until 28 days after the Notice has been served as the landlord has a right of appeal.

Step 5 Issue a Civil Penalty for Non-compliance with a Remedial Notice

If the landlord fails to comply with the Remedial Notice a Civil Penalty will be issued.

The process for serving a Civil Penalty can be found in the Civil Penalty Charging Policy.

Equality Impact Assessment Form



Directorate: Place & Community		Service: Homelessness & Private Sector Housing	
Completed by: Laura Lea		Date: 6 September 2021	
Subject Title: Private Rented Sector Electrical Safety Policy 2021			
1. DESCRIPTION			
Is a policy or strategy being produced or revised:	Yes	<i>*delete as appropriate</i>	
Is a service being designed, redesigned or cutback:	No		
Is a commissioning plan or contract specification being developed:	No		
Is a budget being set or funding allocated:	No		
Is a programme or project being planned:	No		
Are recommendations being presented to senior managers and/or Councillors:	Yes		
Does the activity contribute to meeting our duties under the Equality Act 2010 and Public Sector Equality Duty (Eliminating unlawful discrimination/harassment, advancing equality of opportunity, fostering good relations):	Yes		
Details of the matter under consideration:	The Private Rented Sector Electrical Safety Policy 2021 has been produced following the introduction of the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020		
<p><i>If you answered Yes to any of the above go straight to Section 3</i></p> <p><i>If you answered No to all the above please complete Section 2</i></p>			
2. RELEVANCE			
Does the work being carried out impact on service users, staff or Councillors (stakeholders):	Yes/No*	<i>*delete as appropriate</i>	
If Yes , provide details of how this impacts on service users, staff or Councillors (stakeholders): <i>If you answered Yes go to Section 3</i>			
If you answered No to both Sections 1 and 2 provide details of why there is no impact on these three groups: <i>You do not need to complete the rest of this form.</i>			
3. EVIDENCE COLLECTION			
Who does the work being carried out impact on, i.e. who is/are the stakeholder(s)?	Private sector landlords and tenants		
If the work being carried out relates to a universal service, who needs or uses it most? (Is there any particular group affected more than others)?	Private sector landlords and tenants		

Which of the protected characteristics are most relevant to the work being carried out? Age Gender Disability Race and Culture Sexual Orientation Religion or Belief Gender Reassignment Marriage and Civil Partnership Pregnancy and Maternity	<i>*delete as appropriate</i> Yes No Yes Yes No No No No No
4. DATA ANALYSIS	
In relation to the work being carried out, and the service/function in question, who is actually or currently using the service and why?	Private sector tenants
What will the impact of the work being carried out be on usage/the stakeholders?	There will be a financial impact on landlords in regards to the new obligations. There will be a positive impact on private sector tenants as they will see an improvement in the standard of their property especially in relation to electrical safety.
What are people's views about the services? Are some customers more satisfied than others, and if so what are the reasons? Can these be affected by the proposals?	N/A
What sources of data including consultation results have you used to analyse the impact of the work being carried out on users/stakeholders with protected characteristics?	N/A
If any further data/consultation is needed and is to be gathered, please specify:	None
5. IMPACT OF DECISIONS	
In what way will the changes impact on people with particular protected characteristics (either positively or negatively or in terms of disproportionate impact)?	There will be a positive impact on private sector tenants as they will see an improvement in the standard of their property especially in relation to electrical safety.
6. CONSIDERING THE IMPACT	
If there is a negative impact what action can be taken to mitigate it? (If it is not possible or desirable to take actions to reduce the impact, explain why this is the case (e.g. legislative or financial drivers etc.).	N/A
What actions do you plan to take to address any other issues above?	No actions <i>If no actions are planned state no actions</i>
7. MONITORING AND REVIEWING	
When will this assessment be reviewed and who will review it?	Laura Lea September 2022



**EXECUTIVE OVERVIEW & SCRUTINY
COMMITTEE: 21 October 2021**

CABINET: 2 November 2021

Report of: Corporate Director Place and Community

Relevant Portfolio Holder: Councillor Gaynar Owen

**Contact for further information: Mr Stephen Benge (Extn. 5274)
(Email: stephen.benge@westlancs.gov.uk)**

**SUBJECT: LOCAL PLAN REGULATION 18 (SCOPE, ISSUES & OPTIONS)
CONSULTATION**

Wards affected: Borough wide

1.0 PURPOSE OF THE REPORT

1.1 To seek authorisation to publicly consult on the scope of a new Local Plan and on the West Lancashire Local Plan 2023-2040: Issues & Options material.

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW & SCRUTINY COMMITTEE

2.1 That the Committee consider the content of this report and its Appendices A – H and that the agreed comments of the Committee be passed to Cabinet for their consideration.

3.0 RECOMMENDATIONS TO CABINET

3.1 That regard be had to the agreed comments of the Executive Overview & Scrutiny Committee (21 October 2021; provided at Appendix I), the Sustainability Appraisal and Habitats Regulations Assessment of the Issues & Options material (provided at Appendices B and C respectively), and the Duty to Co-operate Statement (provided at Appendix D).

3.2 That the Local Plan 2023-2040 Issues & Options material (provided at Appendix A) be approved for public consultation and that comments on the scope of a new Local Plan also be sought as part of this public consultation.

4.0 BACKGROUND

- 4.1 Cabinet approved a new Local Development Scheme, which included a timetable for the preparation of a new West Lancashire Local Plan, in March 2020. (An updated Local Development Scheme was approved subsequently in September 2021). Since March 2020, officers have prepared or commissioned a number of documents and reports which form part of the evidence that will inform the preparation of the new Local Plan. In particular, they have prepared a set of Issues & Options consultation material (Appendix A), and its accompanying Sustainability Appraisal (Appendix B), and have commissioned a Habitats Regulations Assessment (Appendix C), all for public consultation.
- 4.2 In relation to the preparation of evidence, officers have been preparing the following evidence documents, all of which will be available alongside the Issues & Options Topic Papers for information and / or comment during the public consultation:
- West Lancashire Strategic Housing and Employment Land Availability Assessment 2020/21;
 - Sustainable Settlement Study 2021;
 - Thematic Evidence Papers.
- 4.3 Other evidence on further topics (including a housing and employment development needs assessment) is being prepared, or will be prepared in due course, but the above provides a good starting point and has provided key information to inform the Issues & Options Topic Papers.
- 4.4 It is vital that the Council demonstrates that it has co-operated with neighbouring local planning authorities and other key organisations in the preparation of a new Local Plan, in order to fulfil the 'Duty to Co-operate'. The Duty to Co-operate is a legal requirement of Local Plan preparation and is an ongoing process. If the Council is found not to have complied with this Duty, it can mean that the Local Plan could be rejected by a Local Plan Inspector at the first step in a Local Plan Examination, in which case the Council would have to start its Local Plan preparation again. As such, it is crucial that the Council provides evidence to show how it has fulfilled the Duty to Co-operate. Therefore, a Duty to Co-operate Statement will be written at each stage of Local Plan preparation to aid with this. The Duty to Co-operate Statement for this Issues & Options Stage is provided at Appendix D.

5.0 CURRENT POSITION

- 5.1 Having undertaken the work outlined above, and having taken on board feedback from the Local Plan Cabinet Working Group, a set of material has been finalised with a view to publicly consulting on the Scope, Issues & Options for a new Local Plan. This marks the first step in the preparation of the new Local Plan where the public are involved. To maximise the efficient use of Council resources and to save time in the Local Plan preparation process, it is proposed that there will be two simultaneous and linked consultations at this stage: one on the general scope of a new Local Plan and one on the Issues & Options material.

- 5.2 The consultation material comprises the following:
- The 'Scope' of the new Local Plan, i.e. what the Plan is intended to cover;
 - A 'portrait' of West Lancashire Borough at present, looking at the different settlements and areas, and themes such as the economy and environment;
 - The main planning-related issues affecting West Lancashire;
 - A Vision for West Lancashire at 2040, the end of the plan period;
 - A series of Objectives for the Local Plan, which are intended to help achieve the plan's Vision. These Objectives are accompanied by indicators, by which it should be possible to measure whether the Objectives are being achieved;
 - A set of proposed policy areas, outlining the suggested and alternative approaches for each policy.
- 5.3 Please note that the material at Appendix A is in Adobe PDF format. It is envisaged that paper copies of consultation material (for those people unable to access the internet) will be broadly similar in appearance to the material at Appendix A. But as highlighted in paragraph 5.7 below, the consultation is intended to be predominantly online, and the online consultation material, whilst containing the same wording as the material in Appendix A, is likely to be somewhat different in appearance, being prepared using the Council's recently-acquired consultation software, 'Bang the Table'.
- 5.4 It is important to note that at this stage of preparing the Local Plan, the Council is not choosing or discussing specific sites where development might be allocated. However, stakeholders will be able to make comments on a set of sites that have been put forward by landowners and/or their agents as possible future development sites. These sites were submitted to the Council following a 'Call for Sites' exercise in spring 2020, and make up the Council's Strategic Housing and Employment Land Availability Assessment ('SHELAA') 2020/21. If new sites were to be required for allocation as the Local Plan advances, the sites would be chosen from this 'pool of sites' (and / or from any additional sites submitted to the Council over coming months). The reason inviting feedback on the SHELAA sites at this stage is so that comments on the sites' suitability (or otherwise) for future development can be made without the immediate pressure and polarisation that occurs as soon as particular sites are proposed for allocation as development sites.
- 5.5 In terms of new Local Plan policies, the consultation material lists all the policies that are proposed to be included in the new Plan, along with a summary of the preferred approach for each policy, and a set of alternative approaches that could be taken. The exceptions are site allocation policies (housing sites / employment sites) as no sites are yet proposed for allocation, and housing and employment land requirement policies, as no figures are currently provided. Site allocations and land requirements policies are therefore omitted from this Scope, Issues & Options consultation.
- 5.6 The consultation will be open in the way that interested parties are invited to respond, but will also provide structure and direction through a series of questions placed throughout the consultation material, which invite comments on particular matters. There will be an option to respond to the Issues & Options

Consultation by essentially undertaking a survey answering these questions, but the consultation will allow more general comments to be submitted as well.

- 5.7 It is proposed that the consultation material will be predominantly online, with a number of separate items, rather than one very long document. This is to encourage as many people as possible to get involved in the consultation to shape their Borough's future. By having separate items and a user-friendly 'home page' linking to different topics and documents, it is hoped that people will find it easy to go quickly to the sections that interest them, and to make comments. For those unable to access or read online material, paper versions of the material can be made available upon request.
- 5.8 Similarly, responses will be strongly encouraged to be made online, although paper-based responses will be accepted from those unable to use the internet and / or access online content. This is consistent with Section 2.4.2 of the Council's Statement of Community Involvement.

6.0 NEXT STEPS

- 6.1 Should Cabinet approve the public consultation on the Scope of the Local Plan and on Issues & Options, the consultation is intended to take place over ten weeks from Thursday 18 November 2021 to Thursday 20 January 2022. This is longer than the 'usual' six week period for such consultations, to reflect the fact that the period spans Christmas and New Year.
- 6.2 As with previous Local Plan consultations, the core of consultation responses has to be submitted as written representations, either as a general comment (on the Scope or on the Issues & Options) or as a response to a survey / questionnaire. Respondents will be required to provide their name and postal or email address (responses cannot be anonymous), although individuals' addresses and any other contact details will be kept strictly confidential in line with Data Protection requirements.
- 6.3 To support this online consultation process, the Council will seek to disseminate information on the content of the Issues & Options consultation in a variety of ways, including:
- A press release, sent to local media;
 - An advertisement in the Champion Newspaper as the consultation period starts, with leaflets sent to addresses in the Borough that do not receive the Champion newspaper;
 - Announcements and information on the Council's website;
 - Letters / emails to all contacts on the Local Plan consultation database (which includes all statutory consultees, Parish Councils, and other major stakeholders), and to those who submitted sites in the 2020 Call for Sites exercise;
 - A briefing for All Council Members;
 - A briefing for Parish Councils;
 - Contact with local education providers, from primary schools to Edge Hill University;

- Social media feeds via the Council's Facebook, Twitter and Instagram accounts.

6.4 The Strategic Planning team plan to engage with stakeholders during the consultation period in a variety of ways, including:

- The placing of material on deposit in suitable public venues, for example libraries;
- Unstaffed exhibitions;
- A dedicated set of Local Plan webpages on the Council's website to make the information about the Issues & Options easily accessible, and to make it simple to respond to the consultation;
- Public events (most likely online, in the light of, Covid-19, and depending on technical matters), where attendees will be able to engage in discussion with Council officers on the Issues & Options and related material;
- A developers' forum.
- Contact with local businesses.

6.5 Following the close of the consultation, officers will collate the written responses received and consider the issues and suggestions raised. It is intended that a further round of public consultation will take place in autumn 2022 specifically on housing and employment land requirements, and on proposed site allocations. Following consideration of representations submitted to both these consultations, it is intended that a final draft Local Plan (known as the 'Publication Local Plan') will be consulted upon in autumn 2023, before being submitted to central government for Examination in early 2024. It is hoped that the new Local Plan can be adopted by the end of 2024.

7.0 SUSTAINABILITY IMPLICATIONS

7.1 Although the decision being considered in this report only relates to a public consultation exercise, it is part of the wider preparation of a new Local Plan and the Local Plan will have definite (and hopefully very positive) implications for sustainability. However, at this early stage in the preparation of the Local Plan, it is impossible to identify what the precise implications will be. The Sustainability Appraisal of the Issues & Options (see Appendix B) does provide an indication of the sustainability implications of the various options being considered.

8.0 FINANCIAL AND RESOURCE IMPLICATIONS

8.1 The new Local Plan is being produced by the Council's Strategic Planning, Regeneration & Implementation Team. However, a document as wide-ranging as a Local Plan will inevitably involve input from various parts of the Council (as well as external stakeholders and partners).

8.2 The costs associated with the public consultation exercise required for the Scoping, Issues & Options consultation will be covered by existing general revenue budgets and no additional costs are expected to be incurred at this stage.

8.3 The cost of producing the Local Plan in its entirety will be met from the Growth and Development Service's revenue budgets together with the previously agreed contribution from Council Reserves for the costs of additional evidence studies and the Examination of the Local Plan.

9.0 RISK ASSESSMENT

9.1 Given that the decision being considered only relates to whether the Council should publicly consult on the Scope and on Issues & Options for the new Local Plan, there is minimal risk to the Council related to this decision. However, the wider preparation of a Local Plan does carry some risks, either related to the costs of abortive work if the Local Plan is ultimately found unsound or not legally compliant, or related to the reputation of the Council should any proposals within the Local Plan prove unpopular.

9.2 However, the undertaking of public consultation such as the Scope, Issues & Options helps minimise these risks due to the fact that carrying out such consultation ensures legal requirements are being met and that a robust Local Plan is being prepared. It also ensures that all interested parties are being given an opportunity to make known their views to the Council, for the Council to consider in the preparation of the Local Plan. While the latter mitigation may not ultimately prevent those upset with particular proposals from expressing their dissatisfaction to the Council, the Council will be able to support the fact that they have given all interested parties a fair hearing and taken into account of representations made.

10.0 HEALTH AND WELLBEING IMPLICATIONS

10.1 The new Local Plan is being prepared with health and wellbeing at its heart. There are strong links between health and planning, and a number of the proposed Plan policies relate directly to health. The Local Plan will be subject to health impact assessments as it passes through its various preparation stages. The Health Impact Assessment for the Issues & Options stage of the Local Plan is provided at Appendix F.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

While the Issues & Options consultation documents themselves do not have any direct impact on members of the public, employees, elected members and / or stakeholders, it is part of a wider process to prepare a Local Plan which will have a direct impact. The preparation of the Local Plan is subject to an Equality Impact Assessment, provided at Appendix E.

In addition, the actual decision being made by Cabinet is whether to undertake a public consultation and so, again, there is an impact on the public and stakeholders.

Therefore, an Equality Impact Assessment on the actual consultation is required; this is provided at Appendix H.

Appendices

Appendix A – Local Plan Issues & Options consultation material

Appendix B – Sustainability Appraisal of the Local Plan Issues & Options

Appendix C – Habitats Regulations Assessment of the Local Plan Issues & Options

Appendix D – Duty to Co-operate Statement

Appendix E – Equality Impact Assessment of Local Plan Preparation

Appendix F – Health Impact Assessment

Appendix G – Data Protection Impact Assessment

Appendix H – Equality Impact Assessment of Local Plan Scope, Issues & Options Consultation

For Cabinet meeting only:

Appendix I – Agreed Comments of Executive Overview & Scrutiny Committee
(21 October 2021)

Appendix A

West Lancashire Local Plan 2023-2040

Scope, Issues & Options Material

Please note this material comprises several different elements that together make up the Scope, Issues & Options consultation material, as listed below. These are not 'one document' as such, but are collated together in this Appendix A.

1. Scope
2. Portrait of West Lancashire
3. Issues
4. Vision
5. Objectives
6. Indicators
7. Policy Areas

Scope

We are preparing a new Local Plan for West Lancashire to cover the period 2023 – 2040.

We are inviting you to comment on what this new Local Plan for West Lancashire should contain (the 'scope' of the new Local Plan).

To help inform your thoughts on any comments you may wish to make at this initial 'scoping stage', we have listed below the policy areas that we think the new Local Plan should contain. In preparing these, we have sought to put sustainable development, health, nature, and the Council's declaration of a climate emergency at the heart of thinking on the new Local Plan

- **Strategic Policies**

- Delivering sustainable development – the 'settlement hierarchy' and the 'presumption in favour of sustainable development' (from national planning policy)
- Housing requirements, employment land requirements, distribution of development around West Lancashire
- Climate change and environmental sustainability
- Settlement boundaries, Protected Land and Green Belt
- Strategic sites

- **Housing and Communities Policies**

- Whereabouts housing can be located (general policy)
- Housing site allocations
- Using land efficiently – 'brownfield' versus 'greenfield' development; housing density
- Dwelling sizes
- Affordable housing
- Housing for older people
- Custom and self-build housing
- Accommodation for students
- Accommodation for caravan and houseboat dwellers
- Accommodation for Gypsies, Travellers and Travelling Showpeople
- Temporary agricultural workers' dwellings
- Principles of 'place-making'
- Preserving the Borough's heritage
- Community Facilities

- **Economy and Employment Policies**

- Employment areas
- Employment site allocations
- The rural economy
- Town centres
- Education: Edge Hill University, skills and training

- **Environment and Health Policies**
 - Preserving and enhancing the Borough's nature
 - Landscape and land resources
 - Flood risk and water resources
 - Contamination and pollution
 - Air quality
 - Green infrastructure, open space, trees, woodlands and hedgerows:
 - Healthy eating and drinking

- **Transport and Infrastructure Policies**
 - Transport networks and access
 - Parking standards and electric vehicle charging points
 - Digital connectivity
 - Low carbon and renewable energy
 - Energy efficiency in new developments
 - Water efficiency in new residential developments

- **Other Policies**
 - Sequential tests – where they are required and how to do them
 - Viability of development – what the Council will expect
 - Developer contributions

Your Views

Is there anything else you think the new Local Plan should cover?

(Please list the items and explain why they should be included in the new Plan)

Is there anything in the list above that you think should **not be included in the new Local Plan?**

Do you have any other comments about the 'scope' of the new Local Plan?

West Lancashire Local Plan 2023-2040

A PORTRAIT OF WEST LANCASHIRE

October 2021

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A Portrait of West Lancashire

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1 Introduction

1.1 This 2021 'Portrait of West Lancashire' describes the different parts of West Lancashire, looking at six sub-areas of the Borough:

- Skelmersdale with Up Holland
- Ormskirk with Aughton
- Burscough
- The Northern Parishes (Rufford, North Meols (Banks), Tarleton, Hesketh Bank)
- The Eastern and Southern Parishes (Bispham, Dalton, Hilldale, Lathom, Newburgh, Parbold, Wrightington, and Bickerstaffe, Lathom South, Simonswood)
- The Western Parishes (Halsall, Downholland, Great Altcar, Scarisbrick)

1.2 It also looks at the Borough as a whole in terms of social and population matters, economic matters, transport and infrastructure, and the natural and built environment. More detail on these topics may be found in the [Thematic Evidence Papers](#) and the [Annual Monitoring Reports](#) (links →).

1.3 This document is essentially an update of the 'Spatial Portrait' contained in the 2012 [West Lancashire Local Plan](#) (link →). It reflects what has changed since 2012 in terms of the nature of West Lancashire and how the Borough functions in the wider Lancashire / Liverpool City Region area. From this, and from the Thematic Papers, one can identify what the most significant planning-related [issues](#) (link →) are for West Lancashire.

2 Skelmersdale with Up Holland

- 2.1. Skelmersdale with Up Holland is designated in the current Local Plan as a Regional Town, the highest tier of West Lancashire's settlement hierarchy. 37% of the Borough's population live there (circa 35,000 in the unparished area of Skelmersdale and over 7,000 in the parish of Up Holland). The area contains a large number of services and facilities, a large stock of housing and employment opportunities. Retail and leisure uses are being improved and there are regular bus services that provide links to Liverpool, Wigan and Southport.
- 2.2. Although historically there was some industry in the Skelmersdale with Up Holland area, the area was predominantly rural until the early 1960s with Up Holland being the larger settlement and Skelmersdale just a small mining community. However, this changed with the establishment of Skelmersdale New Town in 1961 which was planned to accommodate people displaced from the conurbation of Liverpool. Skelmersdale has subsequently grown to become the largest and most populous settlement in the Borough, but has not reached its originally planned size of 80,000 residents.
- 2.3. Skelmersdale has a younger, more varied population structure than other areas of the Borough. However, life expectancy in the Skelmersdale wards of Digmaor, Birch Green and Tanhouse is the lowest in the Borough with men in the most deprived areas having life expectancies almost 10 years less than those in the least deprived areas¹. Skelmersdale is the most deprived area in West Lancashire with 14 of its 23 Lower Super Output Areas (60%) featuring in the 20% most deprived LSOAs nationally (compared with a figure of 14% for the remainder of West Lancashire). There is therefore a clear polarisation within the Borough between those areas with the highest and lowest levels of deprivation.
- 2.4. Rates of unemployment are above average in Skelmersdale. The town has the highest proportion of people in the Borough with no qualifications and there is limited knowledge-based employment available. A significant proportion of Skelmersdale's residents are employed in the town, particularly in manual work in the manufacturing and industrial industries, suggesting that the skills base in the town is low.



Skelmersdale 'youth' Zone

¹ The Seven Wards: A Focus on Skelmersdale, S Collins, Lancashire County Council, March 2015

2.5. The area has good access to the strategic road network with connections to the M58 and M6 beyond, as well as A-roads to Wigan, Ormskirk and St Helens. However, Skelmersdale has the highest proportions of people owning no vehicle, meaning that access to employment and services is increasingly dependent on public transport, and the location of facilities near to housing. The only railway station (Up Holland) is situated to the south east of Skelmersdale, relatively distant and disconnected from residential populations and only providing a limited service between Kirkby and Manchester Victoria via Wigan. As such, Skelmersdale is one of the largest towns in the country without a railway station. This has led the Council and its partners (Lancashire County Council and Merseytravel) to investigate the feasibility of providing a new rail link, joining the Kirkby-Wigan line with a new rail station in Skelmersdale that would provide direct services to both Liverpool and Manchester.

2.6. Skelmersdale, being a 'New Town', consists of clear residential, industrial and retail zones, separated by areas of green space. The presence of sizable employment areas on its outskirts means that the town is West Lancashire's key location for employment, containing 43% of all the Borough's employee jobs and over 70% of the Borough's designated employment land. The town centre contains the purpose-built Concourse Shopping Centre and bus station, some associated services, offices, the new West Lancashire College campus and an Asda superstore at the north-eastern fringe.



The Concourse

2.7. Work has begun on the Skelmersdale Town Centre regeneration scheme. The proposals plan to breathe new life into the area by bringing significant investment and new jobs, whilst also providing multiple benefits for the entire community. Connections through Skelmersdale will be improved and the development includes the construction of a new high street as well as enhancement to the public areas outside the library and a new leisure centre. A new cinema is also proposed in the Concourse Shopping Centre and work is ongoing to ensure this becomes a reality. This would help enhance the town centre's limited entertainment and night-time economy and should reduce the leakage of such spending from the Borough.

2.8. The new town legacy means that just under half of all homes in Skelmersdale are rented and while there is a large stock of housing, its quality is not always high and the choice of larger dwellings can be limited. Residential areas are of varying quality. The 'Radburn' style road layout means the town is essentially congestion-free. Pedestrians are largely segregated from the road system through a network of footpaths, underpasses and footbridges. Use of some of these facilities is limited because of a

perceived risk of crime. There are three local centres at Ashurst, Sandy Lane and Digmaor which offer a range of smaller shops and services.

2.9. The new town has extensive green spaces, with 56% of the area being classed as such. It includes Tawd Valley Park and the Green Flag awarded Beacon Country Park along with a variety of playing fields, wooded cloughs and other open spaces, giving much of the town an open, 'green' feel. The town is surrounded by Green Belt, much of which is the best and most versatile agricultural land (grades 1, 2 and 3a) with the highest quality grades 1 and 2 concentrated to the south and west of Skelmersdale. Additionally, there are several locally important biological heritage sites within and surrounding the town, in particular the Tawd Valley running from the north of the town right into the town centre. The area identified as being at risk from flooding is limited and is primarily confined to a narrow band following the River Tawd.

2.10. Aside from the lack of a rail link serving Skelmersdale and the need to provide an improved town centre, Skelmersdale with Up Holland is generally well served by local services and infrastructure, especially given that the town was originally intended to accommodate more than double its current population. In terms of education, primary school provision is more than adequate and, while attainment levels at secondary level could be improved, there is sufficient secondary school provision.



The Beacon

2.11. Up Holland adjoins Skelmersdale to the east and includes a conservation area and a scheduled ancient monument (Up Holland Benedictine Priory) as well as a nationally important wildlife site at the former Ravenhead Brick Works. It contains a local centre with a range of services, although residents arguably look more towards Wigan than to West Lancashire to meet their needs.



Up Holland Church

3 Ormskirk with Aughton

- 3.1. Ormskirk is an attractive, relatively compact, historic market town situated centrally within West Lancashire. It is the Borough's second largest settlement (2011 population 18,000) and functions as the Borough's administrative centre. Ormskirk contains a full range of facilities and services – retail (town centre shops and two small retail parks), a twice-weekly market (first granted a charter in 1286), leisure, sports,



Ormskirk's historic market

civic functions, primary and secondary schools, a university, hospital, rail and bus stations, and a business park and industrial estate (although the amount of employment land for a settlement the size of Ormskirk is relatively low). The town centre is pedestrianised, much of it lying within a conservation area, containing historic and landmark buildings such as the clock tower and Ormskirk Parish Church with its distinctive joint spire and tower. There is a small parade of shops on County Road in the northern part of Ormskirk, providing local retail and services. Parts of Ormskirk have periodically suffered from flooding associated with the Hurlston Brook which runs south-east to north-west through the town.

- 3.2. Aughton (2011 population of Aughton Parish: 8,000) is a mainly residential area lying directly south of Ormskirk on the rising ground of Holborn Hill, with Christ Church tower a local landmark and 'gateway' into Aughton from Ormskirk. While historically its own entity, Aughton effectively now functions as a 'suburb' of Ormskirk. Properties in Aughton tend to be less old, more 'up market', and less densely spread out than in much of Ormskirk. Apart from two small local centres, Aughton tends to rely on Ormskirk for its facilities and services.

- 3.3. Being a moderately sized town, Ormskirk with Aughton in general has good infrastructure provision, with the widest range of services in West Lancashire. The town has reasonable public transport links to surrounding areas, with a fifteen minute frequency electric rail service to Liverpool, and an hourly diesel service to Preston. However, there are no direct east or west rail links (e.g. to Manchester or Southport). Several bus routes converge at Ormskirk bus station, connecting to Liverpool, Southport, Preston, Skelmersdale and Wigan.



Ormskirk rail station

3.4. The M58 motorway can be accessed three kilometres south east of the settlement, and the A59 provides good north-south road links, whilst the A570 provides north west – south east links. However, there are issues with congestion on the one-way road system around Ormskirk town centre, leading to problems with air quality (with the Borough's only designated Air Quality Management Area being located on Moor Street, adjacent to the bus station). At times, there is congestion between Ormskirk and the M58 motorway junction. Proposals for a bypass were in existence for several decades, but have been shelved, and the future planning for the area is being undertaken on the basis of there being no bypass. Cycling levels for the town are below average, the 'unfriendliness' of the one-way system for cyclists being a factor. Lancashire County Council has prepared a 'Movement Strategy' that seeks to improve traffic conditions for all road users in Ormskirk town centre. Various projects are planned or underway including improved cycle links, and a new bus station.

3.5. Recent housing development of Ormskirk with Aughton has generally been 'infill' and / or 'brownfield' in nature with the exception of Grove Farm, a 300 home greenfield site on the northern edge of Ormskirk. There has been little employment and commercial development in the town, except in the case of retail; indeed several former employment sites have been redeveloped for housing.



3.6. Like other centres, Ormskirk town centre has suffered as a result of general retail trends (out-of-town and internet shopping, and COVID-19). However, the town centre has generally fared better than average, and still has a good number of independent, specialist shops. The night-time economy has developed since 2012, with several new bars and restaurants, boosted by the patronage of the local student population. The Borough Council and local partners are working hard to help the Town Centre bounce back from the COVID-19 pandemic and its effects.

3.7. Apart from small pockets of relative deprivation in Scott Ward, Ormskirk is generally of average affluence. Aughton is one of the most well-to-do areas of the Borough, with many large and expensive properties, its affluence being borne out through national statistics on multiple deprivation, average earnings, car ownership, qualifications, etc.

3.8. Edge Hill University saw significant expansion between 2000 and 2020, and is currently a thriving and popular university with an attractive campus. However, the increase in student numbers has raised issues, most notably a proliferation of houses in multiple occupation in Ormskirk (there are now in the order of 450), leading to a marked change in character in some residential streets, and a much-diminished supply of

affordable or cheaper homes for sale or rent by non-students. More recently, student numbers have stabilised. Coupled with the provision since 2012 of up to 1,000 new purpose-built student bed-spaces on the University campus and in Ormskirk town centre, there are indications that demand for HMOs has lessened recently. Edge Hill University provides a significant boost to the local economy, jobs- and trade-wise (1,830 full time equivalent jobs, including direct and indirect jobs, and jobs supported by student expenditure)². One of the goals of the future planning of the area is the retention of Edge Hill graduates in suitable quality jobs in the Borough.



Edge Hill University Campus

² Edge Hill University, Economic and Social Contribution, Turley, May 2020

4 Burscough

4.1. Burscough is the third largest settlement in West Lancashire (2011 population of Burscough Parish 9,500), and functions as a 'Key Service Centre', providing a good range of services to surrounding rural areas and a significant area of employment land for a town its size. The settlement and its attractive surrounding rural area are flat, and mostly in agricultural use, although Martin Mere (internationally important wetlands and designated Special Protection Area, and an established tourist attraction) lies 1.5 kilometres (1 mile) north west of Burscough. There is some historical interest in and around Burscough, with the remains of an Augustinian priory, a number of listed buildings and Conservation Areas, and the Leeds-Liverpool Canal, which runs east-west through the settlement, with a branch towards Rufford, Tarleton and the River Ribble at the Burscough 'Top Locks' conservation area.



Leeds-Liverpool Canal, Burscough

4.2. Burscough town centre is popular and vibrant with a range of shops including a large supermarket, a sports centre, independent businesses, GP Practices, a well-attended church, GP Practices and a library . It is also home to Burscough Wharf, a unique collection of shops, businesses and other facilities in converted historic buildings adjacent to the Canal. A small retail park, which includes a Booths supermarket, an Aldi supermarket, a petrol filling station and a number of other shops, is located on the southern edge of the settlement providing out of centre retail. There is also planning permission for some office units on the site. Education-wise, Burscough has a secondary school and several primary schools.



Burscough Wharf

4.3. Over the past four decades, Burscough has expanded significantly, following a number of sizeable housing developments. The Yew Tree Farm site (75 hectares, south west of Burscough) has been allocated in the current Local Plan for housing and employment uses, as well as some safeguarded land for potential longer-term development.

4.4. Burscough is reasonably well-connected transport-wise. Two railway routes run through Burscough: from Southport to Wigan / Manchester with a half-hourly service,

and from Ormskirk to Preston with an hourly service. There is no direct connection between the two lines, although the reopening of “the Burscough Curves” has been mooted for a number of years to make this connection. A small number of bus routes serve Burscough, but most are infrequent and do not run in the evenings, meaning that connection by public transport even to nearby Ormskirk can be difficult. The A59 dissects the settlement north-south, and carries heavy traffic at times. The A5209 runs from Burscough towards the M6 and is heavily used, including by HGVs travelling to and from Burscough’s employment areas, even though it is not an ideal route due to the nature of the road as it runs through Burscough and the Eastern Parishes.

- 4.5. Local residents’ main infrastructure concerns relate to drainage and flooding. Even though no part of the town of Burscough is within Flood Zone 2 or 3, it can suffer from problems with surface water drainage and sewer flooding at times of extremely heavy rainfall and New Lane WWTW (which serves Burscough, Ormskirk and parts of Scarisbrick and Rufford) and some of the sewers in Burscough are close to capacity. However, United Utilities are working to address the capacity issue at New Lane WWTW and work closely with the Council to ensure that new developments do not make surface water flooding issues worse.
- 4.6. Burscough as a whole is ‘average’ in terms of affluence / deprivation, its ‘percentage figures’ for various indicators being similar to those for West Lancashire as a whole, although there are localised areas within Burscough with higher than average unemployment rates and related deprivation.

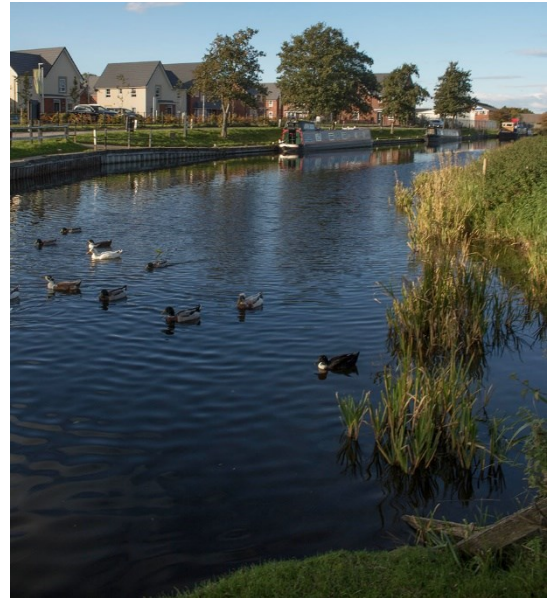


Burscough Bridge rail station

5 The Northern Parishes

5.1. The Northern Parishes in the current Local Plan contain four main villages (Tarleton, Hesketh Bank, Banks and Rufford) within the four parishes of Tarleton, Hesketh-with-Becconsall, North Meols and Rufford respectively.

5.2. Tarleton is the largest of the villages (population of Tarleton Parish circa 5,600). Located within the village centre are a variety of services, including shops, a library and medical facilities and there is a secondary school serving the whole of the Northern Parishes located in the north of the village. The village benefits from being located on the A59/A565 corridor, with good road access to Ormskirk, Burscough, Rufford, Southport and Preston, although there can be congestion on the 'spine road' through the settlement at peak times as traffic from both Tarleton and Hesketh Bank queues towards the A565 / A59 junction.



Tarleton

5.3. Hesketh Bank, the second largest village (population of Hesketh-with-Becconsall Parish circa 4,000), is located directly to the north of Tarleton and effectively forms one linear built-up area with Tarleton on either side of Hesketh Lane / Station Road. The River Douglas / Rufford Branch of the Leeds-Liverpool Canal forms the eastern boundary of the two villages. Hesketh Bank village centre offers some basic services such as a supermarket but looks to the nearby settlement of Tarleton for support regarding services such as secondary education provision and GP Practices. Hesketh Bank in particular has suffered from water supply issues, primarily due to low water pressure if pumps fail or, more commonly, due to the demand from the horticultural businesses in the area. However, United Utilities have been working closely with the



Supermarket, Hesketh Bank

horticultural businesses to rectify this situation. Tidal flood defences have been and will continue to be improved at Hesketh Out Marsh by the setting back of defences further inland, thus creating a large area of saltmarsh.

5.4. The settlement of Banks is located along the A565 corridor in the north west of the Borough adjacent to Crossens (Sefton). A significant proportion of Banks lies within Flood Zone 3 and is thus treated as being at high risk of flooding from rivers and the

sea. The population of Banks is circa 4,000. The number of services within Banks is limited, meaning residents often rely on facilities in neighbouring Sefton (Southport).

5.5. Rufford is located along the A59 and has a population of circa 2,000. The village lacks basic facilities with only one small shop, with residents often relying on Burscough for services and facilities. Rufford has a railway station on the Ormskirk to Preston line, but services are sporadic and do not operate on Sundays. Rufford Old Hall is a very valuable heritage asset located within the settlement and adjacent to the Rufford Branch of the Leeds-Liverpool Canal, with a leisure and tourism offer. Mere Sands Wood Nature Reserve lies to the west of Rufford.



Rufford rail station

5.6. Other smaller settlements within the Northern Parishes include Holmeswood and Mere Brow. The area also contains two large caravan parks, as well as 'Leisure Lakes', a sizeable rural tourist attraction.

5.7. The Northern Parishes primarily have an employment sector based around agriculture, horticulture and produce packing industries. Hesketh Lane and Station Road (the only road in and out of the north of Tarleton and Hesketh Bank) can become heavily congested with a combination of HGVs accessing packing facilities and local traffic, causing significant issues at peak times. Traditional employment uses have mainly moved out of the Northern Parishes, with two former large industrial sites and a former hospital site being developed for housing.

5.8. From a nature conservation and landscape perspective, the Northern Parishes have several areas of ecological and landscape value, including the River Douglas corridor, and all but Rufford parish sit on the edge of the Ribble Estuary, which is an internationally protected site for its ecology (primarily migratory birds) and takes up a large part of the north of the Borough. The landscape in and around Rufford Old Hall is designated as an Area of Landscape History of Regional Importance.



6 The Eastern and Southern Parishes

6.1. The Eastern Parishes in the current Local Plan are formed from ten parishes (Bickerstaffe, Bispham, Dalton, Hilldale, Lathom, Lathom South, Newburgh, Parbold, Simonswood and Wrightington) and the rural parts of Up Holland parish. This area surrounds Skelmersdale to the north, west and south-west. The Eastern Parishes area can be divided into a 'northern area' including a series of attractive and historic villages along the Leeds-Liverpool Canal, Southport to Wigan railway and the A5209 amongst the hills rising towards the east of the Borough, and a flatter 'southern area' between Skelmersdale and Ormskirk and southwards towards Kirkby, generally with significantly fewer facilities, smaller hamlets, and comprising both intensively-farmed prime arable land and peat bog. Both offer attractive views across open countryside. Together, the Eastern and Southern Parishes have a combined population of over 10,000, with the village of Parbold (2011 population circa 2,500) by far the largest of the settlements.

6.2. The 'northern area' contains a number of countryside and recreation assets including the Leeds-Liverpool Canal, the River Douglas Valley and Fairy Glen and relates more to Wigan than to Ormskirk, particularly in terms of public transport, being located along the Southport to Wigan railway line. Notwithstanding the railway, there is a high level of car dependency and some dissatisfaction with access to, and quality of, public transport. Residents have expressed concerns about the closure of local facilities and services, although Parbold Library was reprieved of plans for its closure and continues to serve the local community. Of all the settlements in the Eastern Parishes, Parbold has the highest number of services available, including shops, hospitality, community facilities and a railway station.



Parbold

6.3. The 'southern area' of the Eastern Parishes contains a limited number of small hamlets and scattered collections of dwellings and farmsteads across the whole area. As such, there are very few facilities in this part of the Borough and few transport services. Simonswood, in the very south-west corner of the area adjoining Kirkby, has a relatively large and established industrial area (with planning permission for a further 14 ha of employment land adjacent to it) but there is limited connection between this and the rest of West Lancashire.

6.4. Access to affordable housing and specific provision for elderly people are issues of concern for local people across the Eastern and Southern Parishes. A lack of accessibility to transport, as well as living alone, can contribute to social isolation.

Inevitably, this is of particular concern for rural areas such as the Eastern and Southern Parishes which are less well served by public transport services and where key services, including health services, are more difficult to reach.

6.5. The Eastern and Southern Parishes are comparatively affluent - all fall within the 40% least deprived neighbourhoods nationally. Parbold ward is within the 10% least deprived neighbourhoods in the country. The highest proportion in the Borough of people with Level 4 qualifications (degree level) or higher is found in Parbold, Newburgh and Wrightington. 46% of residents of Parbold have a degree level qualification compared to an overall figure of 26% of West Lancashire's workforce and 24% of the regional workforce. This is also reflected in the professions of residents: 40% of those living in Newburgh ward are employed at managerial level or in professional occupations; figures for other Eastern and Southern Parishes wards are similar. Many of these residents typically commute out of the area for work, although those patterns may have changed as a result of the recent coronavirus pandemic affecting working styles and locations. Around 79% of workers in Newburgh and Parbold travel to work by car.

6.6. Employment-related issues raised during consultation for the previous Local Plan included a desire for a diversified rural economy to help provide more local job opportunities. The shortage of a variety of business premises was one issue that was felt to be holding back the provision of local employment. However, land that has been made available for local employment uses in Appley Bridge has seen limited development or take-up.



Newburgh

6.7. In terms of environmental concerns, the residents of the northern part of this area share a common concern with a large proportion of the rest of the Borough regarding flooding. This is particularly true of the settlements of Appley Bridge and Parbold. There is a wide variety of heritage assets in the Eastern and Southern Parishes area, as well as various areas of ecological value, although none have a national designation.

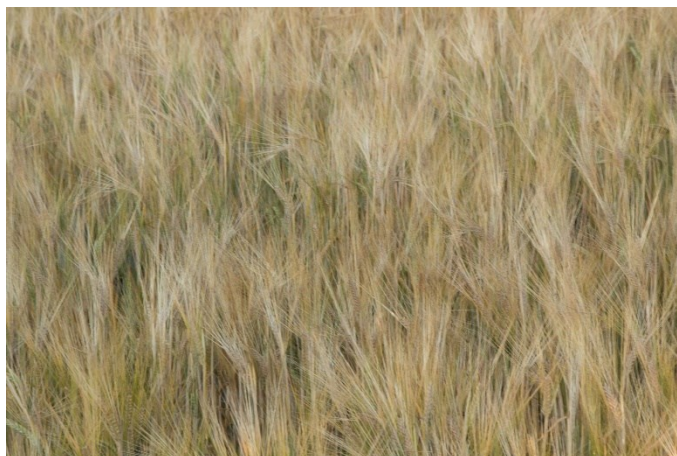
7 The Western Parishes

- 7.1. The Western Parishes, as defined in the current Local Plan, contain a number of small villages and hamlets within the parishes of Downholland, Great Altcar, Halsall, and Scarisbrick as well as the rural areas to the west of the built-up areas of Aughton, Ormskirk and Burscough. Their combined population is less than 7,000. The Western Parishes are located within the flat or gently undulating farmland of the 'coastal plain' where large arable fields are lined with hedges and / or ditches and punctuated by small deciduous woodlands and shelterbelts which are important to local wildlife.
- 7.2. The area does not have a great deal of service provision and accessing such services (especially by public transport) can be challenging. The area tends to rely upon services within neighbouring Sefton (Southport) or Ormskirk, but the A570 road between these settlements can get congested, particularly at the entrance to Southport at Kew. This lack of access to services can lead to rural isolation for older residents and those on low incomes. In part of the area, there is also a shortage of affordable housing to meet local needs.
- 7.3. The Grade 1 Listed Gothic Revival Scarisbrick Hall is a landmark building set within attractive, protected parkland (included on Historic England's Register of Historic Parks and Gardens). As well as being a nationally important example of this style of architecture, it is also an important local heritage asset and the extensive parkland plays a significant role in the cultural landscape, nature value and history of the local area. The complex is also a private school, including primary, secondary and sixth form.
- 7.4. The Western Parishes countryside plays host to a number of tourist and leisure related facilities such as Farmer Ted's, Scarisbrick Marina, the Leeds-Liverpool Canal, Haskayne Cutting Nature Reserve and the Cheshire Lines long-distance path, with



other attractions such as Leisure Lakes, Mere Sands Wood Nature Reserve, Windmill Farm and Martin Mere just across Parish boundaries in Tarleton, Rufford and Burscough. The proximity of Martin Mere and the Ribble Estuary (to the north / north west of the Borough) means that, depending on the agricultural practices in any given field, the open fields of the Western Parishes provide valuable feeding habitat to many thousands of migrant wild ducks, geese, waders and swans which over-winter in the area.

- 7.5. The Western Parishes contain a very high proportion of prime agricultural land and are an important centre of food production. This can cause conflict with the area's nature status since the intensification of farming practice can pose a threat to the biodiversity value of the land. Significant areas of Grade 1 agricultural land have over recent years been used for turf growing, rather than food production. The western part of the Western Parishes (adjoining the boundary with Southport) is mainly in Flood Zone 2 or 3 and is an area of deep peat deposits which can create difficult ground conditions, limiting the viability or achievability of development, as well as releasing carbon dioxide into the atmosphere when the peat is disturbed. The northern part of Sefton Borough has land constraints, the urban area extending close to, or up to, the [rural] West Lancashire boundary for much of the way from Woodvale to Crossens.
- 7.6. The Western Parishes area also contains a significant part of the 'Alt-Crossens' catchment area. This low-lying land is drained by a network of ditches and other watercourses, aided by a series of pumping stations. The Environment Agency has expressed an intention to cease operating five of the 'satellite' pumping stations in future, which could lead to land being waterlogged for significant periods, and would affect the agricultural value of the land as well as transport infrastructure such as the 'moss roads' and the Southport to Wigan and Ormskirk to Preston railway lines. These controversial plans have been postponed until 2023 and discussions are ongoing as to the best way to manage the drainage of the area in the future.
- 7.7. Around 30% of residents in the Western Parishes are classed as economically inactive – this category includes retired people, students, non-working parents, sick or disabled people and job-seekers. Of this proportion around two thirds are retired while 10% are classed as sick or disabled. The retired sector of the population is set to increase over the coming decades which may present challenges to service provision in the future. If these groups are to maintain good links to the rest of the community and to vital services, avoiding isolation, then this needs to be positively planned for.



Crop growing, Western Parishes

8 West Lancashire in General

Social & Demographic Matters

- 8.1. The population of West Lancashire has been increasing slowly but steadily since 1999. At the 2011 Census the Borough had a population of 110,685, a 2.1% increase from 2001. The latest mid-year estimates of population, for 2020, give the Borough's population as 114,500.
- 8.2. The Borough's population is projected to rise to 118,300 by 2043 – a 3.8% increase on its 2018 level, equating to an additional 4,300 residents. The main changes forecast to the age structure are an increase in the proportion of residents aged over 60 and a decrease of those of working age (aged 15-59). The greatest percentage increase predicted is to the age category 75+ with a growth of 64% between 2018 and 2043.
- 8.3. The highest numbers of residents are found in the urban areas of Skelmersdale, Ormskirk with Aughton, and Burscough. There is some variation in age structure between settlement areas. The rural areas of the Borough are more attractive to people of middle or retirement age whilst Skelmersdale has a younger, more varied population structure. Ormskirk has a "spike" in the 15-24 age group on account of the presence of Edge Hill University.
- 8.4. At the 2011 Census, 96% of West Lancashire residents described themselves as White British. The remaining 4% describing themselves as Mixed, Asian, Black, Chinese or another ethnicity.
- 8.5. In the 2015 Indices of Multiple Deprivation (CLG), West Lancashire was ranked 164th out of 326 local authorities in England. This places the Borough in the middle rankings nationally. However, varying levels of deprivation are found within the different settlements / areas of the Borough. Skelmersdale has markedly higher levels of deprivation than the rest of the Borough, with 14 of its 23 Lower Super Output Areas (LSOAs) (61%) falling within the worst 20% deprived neighbourhoods nationally. Conversely, some areas of the Borough have some of the lowest levels of deprivation nationally, including Aughton, Ormskirk, Parbold and Tarleton. There is therefore a clear polarisation and inequalities between different areas of the Borough, and this is borne out by the differences in issues identified in the above spatial areas.
- 8.6. In the 2011 Census, 88% of West Lancashire residents described their health as 'very good' or 'good' indicating that the majority of residents consider themselves to be in good health. However, results vary at a ward level, with residents from Skelmersdale wards rating their health as less good than residents of Aughton, Hesketh-with-Becconsall and Parbold. Health statistics also indicate significant differences across West Lancashire, including in premature mortality rates between the least and most

deprived areas of the Borough. Reasons for these differences are complex and interrelated, and may include the local environment and economy, mental health issues, and lifestyle factors such as diet and smoking. Life expectancies of men in the most deprived areas of the Borough are almost ten years shorter than those of men in the least deprived areas of the Borough.

- 8.7. The Borough's ageing population is likely to create impacts on health, as more people are expected to live longer and spend more years in poorer health. For example, the proportion and numbers of people expected to have dementia are expected to increase and 20% of the population aged over 65 are expected to have problems with their mobility. The lack of access to key services and public transport provision in rural areas, as identified in the Northern, Eastern and Western Parishes sections above, leads to rural isolation and this will only be magnified as the population in those areas get older, adding to the health concerns of an ageing population.
- 8.8. 26% of West Lancashire's workforce have a degree (or equivalent) or higher, placing West Lancashire on par with the North West and England. However, there are disparities between different parts of the Borough in relation to education and skills and economic activity, with Skelmersdale performing significantly less well than other areas in the Borough.
- 8.9. West Lancashire has low levels of recorded crime. Over a 5 year period, reports of offences in West Lancashire have fallen considerably for most common crimes, especially in 2020 – probably as a result of the Covid-19 'lockdowns' meaning fewer people were out of their homes. However, the most recent figures for hospital admissions as a result of violence (presuming violence must relate to a crime, although not all may be reported) show that West Lancashire rates significantly above the national average in this measure, although below the North West average.
- 8.10. In relation to housing, 85% of the dwelling stock in West Lancashire is privately owned and 13% owned by the local authority. Almost a quarter of all homes (24%) are rented whilst 73% are owner occupied. The rural areas tend to have the most homes owned outright whilst in Skelmersdale almost half of all homes are rented, mainly from the Council. There is limited housing available for rental from registered social landlords (2%) when compared to the North West (11%) and England (8%).
- 8.11. Between 2001 and 2011, the proportion of households who rented privately increased by 69% whilst the proportion in social rented tenure decreased by 8%. The increase in privately rented homes is largely due to the increase in house prices. The gap between wages and house prices makes it hard for first time buyers to get on the housing ladder and people, particularly young people, are being priced out of home ownership altogether and forced into private renting.

- 8.12. As with most other areas of the country, housing affordability is an issue for West Lancashire. The average house price in West Lancashire in 2020 stood at £184,950. The median house price in 2020 was 6.2 times the median earnings, higher than the county average (5.4) but below the national average (7.8).
- 8.13. The government's 2018-based household projections indicate that by 2043, West Lancashire will have 49,000 households, an increase of 5.3% from its 2018 level. (Please note these Projections show what would happen if recent trends were to continue; they are not forecasts.) It is projected that the number of households headed by someone aged over 85 will increase by 106% between 2018 and 2043, and those households headed by someone aged 75-84 will increase by 51% over the same period. Conversely, decreases are expected in the groups of working age households.
- 8.14. The strength of the housing market varies across the Borough, in broadly the same pattern as is seen with deprivation. There is significant demand to live in most parts of the Borough, although the cost of housing is prohibitive to many. Other aspects of the housing market are artificially inflated by specific demands, such as for relatively cheaper housing in the Ormskirk area, where house prices have been driven up by demand from landlords for properties to convert to HMOs for students.
- 8.15. Housing is not just about bricks and mortar dwellings, and there is demand in West Lancashire for accommodation in caravans and houseboats, so the need must be considered for these accommodation types, including for Gypsies, Travellers and Travelling Showpeople.
- 8.16. The popularity of self- and custom-build housing has risen in profile in the UK in recent years with TV programmes on the subject boosting interest in, and appetite for, people to build or adapt their own homes. The government has recognised this and the value of developing the self- and custom-build market in the UK to be more in line with Europe and the United States. As such, it is now a policy requirement to make adequate provision of sites to meet the local demand for self- and custom-build.

Economic Matters

- 8.17. There were 53,900 economically active people in West Lancashire in December 2020 representing an economic activity rate of 76.5% which was lower than both the North West and Great Britain. This is partly explained by the Borough's large student population. A significant proportion of economically inactive people in the Borough have indicated that they want to work. The increasing ageing of West Lancashire's population in the future means that there will be a reduction in the local workforce unless economic inactivity decreases, people choose to work beyond retirement and / or there is additional in migration or in-commuting of those of working age.

- 8.18. The unemployment rate for the Borough in December 2020 (3.7%) was lower than for the North West and Great Britain which has been a generally consistent trend. Unemployment in the Borough has steadily decreased since September 2012; however, the long term effects of the Covid-19 pandemic upon economic activity are uncertain. Significant geographical variations remain between the different settlements and wards of the Borough with the highest unemployment rates in Skelmersdale.
- 8.19. The occupations of the Borough's residents are broadly similar to England and Wales. However, there are proportionately less residents employed in the higher skilled occupations (managers, professionals, associate and technical) in West Lancashire than the national average and proportionately greater in the less skilled and unskilled occupations. In the Borough's rural areas, agricultural and horticultural employers (including packaging industries) play an important role, although these often rely upon migrant and seasonal workers.
- 8.20. West Lancashire has experienced prolonged and steady growth in the total number of indigenous employees from less than 10,000 in 1929 to 50,400 in 2018. The largest numbers of employees in the Borough in 2018 were within the wholesale, retail and repairs, manufacturing, health education (partly due to the presence of Edge Hill University) and accommodation and food services sectors. There was an overall increase of more than 6,000 jobs between 2009 and 2018. However, future prospects for economic growth in West Lancashire are unlikely to be as good in the post-Covid, post-Brexit world due to the local economic structure.
- 8.21. The Borough is home to a number of international and nationally recognised companies including NSG Group, Co-operative Bank, DHL, Hotter Shoes Huntapac, Asda, Walkers Snack Foods and CRP Subsea. In addition, there are also important local employers such as Edge Hill University, West Lancashire Council and Southport and Ormskirk Hospital NHS Trust. Whilst the Borough contains a number of major employers, in 2020 the vast majority of the 4,520 active enterprises were 'micro' businesses (defined as 0-9 employees) followed by 'small' (10-49 employees). Most traditional employment uses (former use classes B1, B2 and class B8) are located in Skelmersdale, with Burscough and Simonswood also key locations.
- 8.22. West Lancashire has strong economic links with areas outside the Borough which is reflected by commuter flows. The 2011 Census indicated there was a total outflow of 22,000 commuters with Sefton being the most popular destination, followed by Liverpool and Wigan. Inward commuting flows were 2,200 less, but comprised large numbers from Sefton and Wigan. Skelmersdale remains a significant employment destination. The Covid-19 pandemic has resulted in substantial shift towards

homeworking for employees not primarily reliant upon face to face contact. The permanence of this shift is uncertain and will need to be monitored.

- 8.23. Ormskirk, Skelmersdale, and to a lesser extent Burscough, are the Borough's main shopping and commercial centres. The retail, commercial leisure and night-time economy offer in West Lancashire remains relatively modest which means that there is significant 'leakage' of expenditure to surrounding areas including Southport, Wigan and Liverpool. This is not so much the case for convenience goods (essentially food) expenditure reflecting the more localised nature of food shopping trips. Town Centres are facing very challenging times and need to evolve their roles, with competition from out-of-centre retail, and the effects of the Covid-19 pandemic accelerating trends towards online shopping.

Transport & Infrastructure

- 8.24. West Lancashire's geographical location provides good road access to the neighbouring towns of Southport, Preston, St Helens, Wigan and Liverpool. There are also good connections to the wider motorway network via the M58 and M6. However, within the Borough itself there are issues regarding traffic congestion around Ormskirk Town Centre as a result of the one-way system on the A570. There can also be heavy traffic through Burscough, and on the A5209 linking Burscough with the M6 at Shevington.
- 8.25. Three railway lines run through the Borough, providing a 15-minute frequency electric service from Ormskirk to Liverpool, and diesel services from Ormskirk to Preston, and from Southport to Wigan and Manchester. Up Holland has a station on the Wigan to Kirkby line. Interchanging between these lines within the Borough is possible, but can be difficult. There are regular bus services between Southport and Wigan, which travel via Skelmersdale and Ormskirk; between Ormskirk and Preston (some running via Tarleton); and between Southport and Preston (via Banks). However, public transport services within the remainder of the Borough are generally poor, particularly in the rural areas.

8.26. No infrastructure constraints to development have been identified at these initial stages of plan preparation that would entirely rule out development in an area. This includes water supply and waste water infrastructure, gas and electricity infrastructure and broadband and telecommunications infrastructure. The Council recognises the importance of strong working relationships with infrastructure providers to share information throughout the plan preparation process and to allow an informed decision-making process.



Electric vehicle charging points in a retail development

8.27. Water supply does not currently present an issue for most parts of West Lancashire with the exception of the Northern Parishes where, due to the local topography and demand from the horticultural businesses in the area, the water pressure (and therefore supply) can be affected. United Utilities, the local water and wastewater supplier, has plans to upgrade the Bickerstaffe Waste Water Treatment Works (WWTW) and the local borehole source to reduce the reliance on the River Dee supply. Overall, from a water supply perspective, no fundamental issues have been identified in terms of meeting possible levels of growth, but localised upgrading of water supply infrastructure will likely be required to be delivered through any larger developments. Climate change may create water supply issues in the future.

8.28. In terms of waste water treatment, United Utilities are considering solutions to increasing the capacity of New Lane WWTW, which serves Burscough, Ormskirk, Rufford and parts of Scarisbrick, as it is currently close to capacity.

8.29. Within West Lancashire, transport planning is the responsibility of Lancashire County Council. The Lancashire Local Transport Plan (LTP3) 2011-2021 and the West Lancashire Highways and Transport Masterplan (2014) set out the vision and objectives for future transport in the Borough. These documents outline plans to transform the transport network in West Lancashire, a desired new railway station in Skelmersdale, a Route Management Plan for West Lancashire (including a Movement Strategy for Ormskirk) and improvements to strategic cycle routes, thereby providing opportunities to support road, rail, bus and cycle and pedestrian transport modes. However, it will also be necessary to explore



how to connect residents with service and employment areas, especially in rural areas, given the reduction in bus services across the Borough over recent years.

8.30. The increasing ageing population will inevitably place greater demands on health services and if there is any significant increase in population, this will require additional provision of GPs and other health, community and social care services.

8.31. In relation to education provision, the Education Authority expects there to be sufficient numbers of primary places, and a surplus of secondary school places, up to 2027, which means there are no immediate issues with education provision.



Skelmersdale College

8.32. The Council has a desire to replace the existing leisure facilities in Skelmersdale and Ormskirk and to improve Burscough Sports Centre, and recognises the importance of outdoor sports and recreation facilities, including parks and green space, all the more so in the light of the COVID 19 pandemic. Green infrastructure, and biodiversity sites, need to be protected and where possible improved, whilst maximising opportunities for sustainable access to such sites.

The Natural and Built Environment

8.33. The landscape of West Lancashire is characterised by the largely flat extensive mosslands and wetlands of the Coastal Plain in the west and north of the Borough. The flat and fertile plains provide ideal farmland and the Borough contains a very high proportion of the Grade 1 agricultural land in the North West. In the east of the Borough, the Up Holland ridge, Ashurst Beacon and Parbold Hill offer views over the surrounding countryside, extending as far as North Wales and Cumbria.

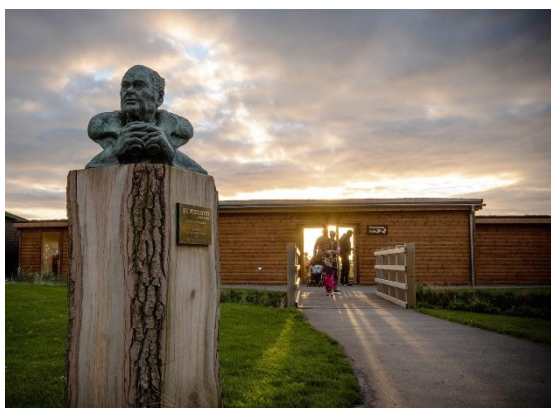
8.34. The history of the area as an arable landscape is reflected in the built development. Clustered red brick farm buildings, hamlets, rural villages and historic towns are all present, some of which have been heavily influenced by 20th century modernisation and development. There are also a number of designed landscapes associated with large historic estates, such as Rufford Old and New Hall, Scarisbrick Hall, Lathom Hall, Blythe Hall and Moor Hall.

8.35. There are around 500 listed buildings and 169 locally listed buildings and structures across the Borough. Reflecting the area's agricultural heritage, over 120 of the listed buildings are farmhouses, and many of the remainder are in some way related to agriculture (e.g. barns or agricultural workers' dwellings). There are also 28 conservation areas protecting a varied range of places including agricultural villages, residential parks, and parkland estates of large manor houses, for their historic and/or architectural interest.



Heritage

8.36. The Borough has a sizeable amount of its area covered by nature reserves, with Martin Mere and the Ribble Estuary being the largest two assets, and the latter forming part of the coastal zone. These are recognised as internationally important wetland habitats, particularly important as a winter feeding ground for migratory wetland birds, including pink footed geese. In addition, there are 6 Sites of Special Scientific Interest (SSSIs) and a number of local nature reserves.



Martin Mere Wildfowl & Wetlands Trust

8.37. West Lancashire provides important habitats for a number of protected species including many varieties of birds, water voles and great crested newts. There are also a series of major wildlife corridors running through the Borough. In the face of continuing biodiversity loss, it will be increasingly important to protect and enhance the Borough's habitats and biodiversity. Biodiversity Net Gain, emerging through national policy, provides one opportunity for the Borough to deliver improvements to biodiversity.

8.38. As the climate changes, a range of species may shift northwards, and an ecological network of habitats and corridors, allowing the movement of species, will be increasingly important. In more general terms, Climate Change will pose a threat to the social, economic and environmental well-being of the Borough, and it is clear that measures will be needed to adapt to, and mitigate, the climate emergency at a local level.

8.39. At present, carbon dioxide emissions in West Lancashire are high in comparison to other Lancashire authorities and the rate for tonnes per person is above the national level. Emissions are greatest from transport, industry/land use, and domestic energy. Energy consumption is high, against ever-increasing (carbon based) energy costs, with the risk of many residents being in 'fuel poverty' and/or suffering further climate injustices (e.g. social heat vulnerability). With national targets to achieve net zero carbon emissions by 2050, action is needed at a local level to reduce the Borough's emissions, improve energy efficiency and promote renewable energy with further opportunities to develop a green economy.



Mere Sands Wood (Wildlife Trust)

8.40. Two key waterways in the Borough are the River Douglas located in the east, and the Leeds-Liverpool Canal which bisects the Borough and also branches off to the north at Rufford. Due to the flat topography of the land, large areas within the Northern Parishes (and to a lesser degree the Western Parishes) are located within Flood Zone 3; this puts them at the greatest risk from potential flooding.

8.41. The Government's climate change risk assessment identifies flood risk, and particularly flooding from heavy downpours, as one of the key climate threats for the UK, alongside stresses on water resources, threats to biodiversity and natural habitats. Given the nature of the West Lancashire landscape described above, flooding is likely to be a considerable issue in the Borough in the future.



Your Views

Do you have any comments on the 'Portrait of West Lancashire'?

Issues Affecting West Lancashire

Note: many of these issues are not unique to West Lancashire.

A. By Thematic / Topic Area

Population, health and social inclusion

Ageing population – the Borough's population is increasing steadily but the proportion of people aged over 65 is expected to increase dramatically, whilst the working age population decreases. This is likely to lead to higher demand for provision of housing, services, health care, and appropriate training / jobs for the older population. At the same time, the number of persons able to contribute towards providing such services is decreasing.

Health / Inequalities – there are disparities and inequalities in health, life expectancy, education levels, and job opportunities across the Borough. These are most marked between Skelmersdale and affluent areas such as Aughton, Parbold and Tarleton. Levels of obesity (children) and physical inactivity (adults) in West Lancashire have been higher than the national average.

Housing

Affordability – house prices in West Lancashire are higher than local and regional averages and there is a need for affordable housing in both urban and rural areas.

Specialist needs housing – there is an unequal distribution of house types, sizes, tenures and prices across the Borough. Different demands from different parts of the population (e.g. older people, students, etc.) means a variety of housing needs must be met, including adaptable homes.

Gypsy & Traveller sites – there is a shortage of authorised / suitable accommodation in the Borough for the travelling community, with most current sites unauthorised and in unsuitable locations (e.g. in Flood Zone 3).

Student accommodation – there is a demand for student housing in Ormskirk. The conversion of family homes to houses of multiple occupation (HMOs) has created localised issues for the town. Recent developments of purpose-built student accommodation appear to have lessened the demand for HMOs in the short-term.

Local economy and employment

Inequalities – there are disparities and inequalities across the Borough in terms of education, skills, qualifications, income, and employment opportunities, most notably between Skelmersdale and other parts of the Borough.

Employment opportunities - economically, West Lancashire continues to gradually grow, with a steady ongoing growth in jobs. The Borough has a varied and wide-ranging employment base, including strong agricultural, manufacturing and distribution sectors. But there is a need to support and maintain a wide range of job opportunities, in a wide range of sectors, with a wide range of scales.

<p>Rural economy / diversification – there are issues of isolation, poverty, limited employment opportunities and inadequate transport in rural areas. Broadband provision is less good there than in urban areas. Agricultural, horticultural, and associated businesses play a key role in the local economy but need policies to support and potentially provide sites for such uses. Rural diversification helps support rural economies.</p>
<p>Retail / town centres – town centres suffer 'leakage' of expenditure to neighbouring centres, and increasing vacancy rates. In response to numerous challenges including online retail and the impacts of Covid-19, the Borough's town centres need to reinvent themselves to meet 21st Century preferences for shopping, leisure and entertainment.</p>
<p>Brexit / Covid-19 – the scale and duration of the effects of the Covid-19 pandemic and Brexit on employment / unemployment are still uncertain. The local economy is more vulnerable to the effects of Brexit than the national average, e.g. on account of the agricultural and food sectors.</p>
<p>Employment land availability – take-up of employment land has not been significant over recent years. This may be due to wider factors (recession, etc.) but may also imply a lack of suitable sites / ranges of sites. There are limited opportunities to redevelop existing industrial estates. There has been pressure in some parts of the Borough for housing on existing employment sites.</p>
<p>Edge Hill University – the University brings economic benefits to the Borough, but has created issues such as housing pressure (HMOs) and traffic congestion at times. There is a desire to attract additional graduate-level jobs to West Lancashire.</p>

Transport

<p>Accessibility – there are varying levels of accessibility to services / facilities / jobs in both urban and rural areas in West Lancashire. Residents without access to private transport are often disadvantaged in terms of access to job opportunities. Rural public transport does not serve all areas, and deficiencies have been worsened by certain bus services being withdrawn.</p>
<p>Traffic congestion – congestion exists in Ormskirk, in particular around the one way system, and at certain times of year (Freshers' week); there are 'blackspots' elsewhere.</p>
<p>Active and sustainable travel – car use is high and public transport use is lower than it could be. Cycling levels in the Borough are low; a less than optimal infrastructure and Ormskirk's one way system are seen as a deterrent to cycling. There is a need to create more connected, walkable communities, planned around people rather than cars, and providing attractive opportunities for regular active travel. Existing sub-standard footpaths and walkways, both urban and rural, need to be renewed and upgraded.</p>
<p>Changes in working patterns – the after-effects of the Covid-19 pandemic may create longer-term changes in travel to work patterns, for example through a continued increase in home working / different working hours.</p>
<p>Rail – Skelmersdale is one of the largest settlements in the country with no rail service. Rail services between Ormskirk and Preston could be improved. Consideration should be given to creating / improving park-and-ride facilities.</p>
<p>Climate change – moving towards net zero carbon emissions will require much better public electric charging infrastructure and higher network grid capacity. As transport is a major contributor to CO₂ emissions in the Borough, sustainable transport needs to be encouraged.</p>

Land Resources

Green Belt – the extensive Green Belt land in the Borough is both an environmental asset and a constraint to the future development of West Lancashire.

Agricultural land - most of the agricultural land in the Borough is a classed within the best and most versatile category, and is a regionally and nationally important resource vital to the high performing agricultural industry in West Lancashire. Loss of such land to development, or from flooding / drought, could impact the local and wider economy, as well as food security.

Land constraints – there remain vacant and previously developed sites in the Borough, although the supply is declining. Viability issues can make it difficult to bring forward some of the remaining brownfield sites in West Lancashire. Other land constraints include natural peat moss / bog, which also has implications for carbon capture / release and climate change.

Cultural heritage and landscape

Heritage assets – A number of West Lancashire's heritage assets may be at risk, threatening local character. Development pressures within Conservation Areas, to Listed Buildings, and within historic landscapes can pose a risk to local character and distinctiveness.

Green Tourism - heritage and landscape are important parts of the Borough's character and tourist economy. They present opportunities to improve health and wellbeing through 'outdoor access'.

Climate emergency, energy and flooding

Improving building efficiencies – most buildings being built now are not fit for 2050 or beyond. New buildings need to be highly energy efficient, accommodate low carbon heating (and, in future, cooling) options, and be resilient to climate change.

Low carbon and renewable energy generation – there is capacity for local renewable energy generation in West Lancashire, but delivery to date has fallen far short of potential. Community energy schemes can provide local areas with lower cost, greener energy.

Peatland – parts of West Lancashire are peatland, where development should be avoided if possible. If not avoidable, the impacts of carbon loss need to be mitigated or offset.

Flooding – some areas of the Borough are located within Flood Zones whilst some other areas are at risk of localised flooding from surface water, groundwater and hydraulic sources. SuDS, which could be incorporated as part of green infrastructure, provide an opportunity to control risk by managing surface water and run-off rates. Conversely, the trend of surfacing front gardens with impermeable material contributes towards increased surface water run-off.

Climate Inequalities – there are inequalities across the Borough relating to Climate Justice (where climate change affects some people more severely or 'unfairly' than others), including those relating to fuel poverty.

Water quality and resources

Water resources – pressures on water resources are likely to increase in the future. The impact of climate change, development, and population increase will make the protection and sustainable management of groundwater and surface water resources an important concern. The Borough has a number of water assets (rivers, aquifers, ponds, the Leeds Liverpool Canal, the Ribble Estuary) that contribute to the local landscape, economy, and biodiversity.

Pressures on supply – in general terms, water supply is, and should continue to be, adequate across the Borough. There are localised areas in the Northern Parishes where mains water pressure is low as a result of draw-offs from the market gardening industry.

There is some restricted capacity in the wastewater network. The Burscough area has some capacity issues within the sewer network.

Biodiversity – some watercourses in West Lancashire are of poor or only reasonable quality, which may adversely affect biodiversity.

Improving water efficiencies – we need to know whether water efficiency measures can be incorporated into developments and new buildings, and the role that sustainable drainage systems can play.

Air quality

Air quality – there is an Air Quality Management Area in central Ormskirk, predominantly on account of pollution from motor vehicles. Elsewhere in West Lancashire, air quality tends not to be a pressing issue, but appropriate measures will be required to ensure this continues in areas where new development is focused.

Biodiversity

Protecting and enhancing biodiversity – development can have direct or indirect impacts on biodiversity, including on sensitive habitats. There is a need to integrate habitat and species restoration and enhancement into development proposals to improve biodiversity, not just to compensate for losses. The forthcoming requirement to deliver 'Biodiversity Net Gain' presents opportunities and will need to be reflected in the Local Plan and planning decisions.

Protected species and sites – West Lancashire contains a number of Protected Species and their habitats; it is important that these continue to be protected as required by law.

Wildlife corridors and networks – the effects of climate change and flooding will be a threat to the Borough's biodiversity in the future. An increase in temperatures will force some species to migrate north. Current inadequate 'ecological networks' make the Borough vulnerable to species loss. Connecting habitats, and protecting and enhancing wildlife corridors is an important priority – particularly in more urban areas of the Borough – to help facilitate species transfer.

Green infrastructure – the Borough contains a wealth of open space and recreational facilities. We need to maximise appropriate access to, and linkages between these assets. Green Infrastructure improvements should not just cover physical infrastructure but also include priorities for enhancing biodiversity.

Tree planting - national recommendations are that tree planting should be accelerated, and that Green Infrastructure be improved.

Accessibility (Local Services and Community Infrastructure)

Rural accessibility – West Lancashire is, in general terms, less ‘accessible’ than the average Lancashire district, on account of the rural nature of much of the Borough. Many rural areas in the Borough have inadequate access to public transport.

Health – general accessibility, in terms of distance to key services, has decreased over recent years, most likely due to the closure of some rural services (e.g. Post Offices and shops). Access to open space is reasonably adequate although some parts of the Borough lack formal parks or children’s play facilities.

Infrastructure – many parts of the Borough suffer from limited infrastructure capacity. Solutions need to be provided so that future development needs can be accommodated.

By Geographical Area:

Skelmersdale with Up Holland:

- Skelmersdale continues to suffer from a negative image; this is considered to have an impact on levels of investment in the town.
- Development of parts of the Skelmersdale area is constrained by former coal workings.
- The town contains deprived areas, having on average poorer health, lower educational attainment, higher unemployment and lower incomes than other parts of West Lancashire.
- Parts of the town are poorly designed and / or in need of regeneration. Regeneration work has started in Skelmersdale town centre but there is plenty more than could be done.
- The town is well located in relation to the strategic road network to benefit from inward investment.
- There are reasonable bus services to neighbouring towns but the town lacks a rail station.

Ormskirk with Aughton:

- Ormskirk town centre, like other centres, is subject to various pressures, most recently Covid. The town centre needs to ‘evolve’, making the most of its assets, in order to maintain its vitality and viability.
- There are problems with traffic congestion in and around the town centre.
- Edge Hill University, whilst providing significant economic benefits to the town, has impacted upon Ormskirk, in particular with regard to student accommodation (houses in multiple occupation) and, seasonally, traffic congestion.

Burscough:

- Burscough has seen significant housing and employment development over recent years, continuing with Yew Tree Farm and Burscough Industrial Estate. It is important to ensure that that new development integrates well with the existing settlement.

- Burscough’s sewerage system is close to capacity and there are concerns amongst residents about surface water drainage and flooding.
- The road system through Burscough can become congested at times, in particular on the A59. There is no direct access to the motorway system from the town.

Northern Parishes:

- Lack of public transport generally, and access to services in Banks and Rufford particularly, leads to rural isolation for some residents, especially those on lower incomes or of an older age.
- The combined impact of the horticultural business (including HGVs) and local residential traffic on Hesketh Lane / Station Road causes congestion at times in Tarleton.
- Virtually the whole of North Meols Parish is within Flood Zones 2 / 3 and so is severely restricted in terms of potential for new development, although the village is well protected by the coastal flood defences.

Eastern and Southern Parishes:

- Lack of services / inadequate services, and access to public transport can lead to rural isolation in parts of the Eastern and Southern Parishes.
- There have been incidents of localised flooding in the northern part of the area.
- Road infrastructure is inadequate for increasing HGV movements.
- Access to housing is an issue – particularly for older people and those in need of affordable housing.

Western Parishes:

- Parts of the Western Parishes area suffer rural isolation and poor access to services.
- Land close to the boundary with Southport is subject to flood risk and has peat deposits.
- The proposed switching off of Alt-Crossens satellite pumps could lead to regular flooding of Grade 1 agricultural land in the future.

Your Views

Have we identified the main planning-related issues in West Lancashire?

Should any be changed?

Should any be removed?

Should any others be added?

(Please provide comments below.)

Vision

West Lancashire in 2040 will be an attractive place that people want to live in, work in, and visit. The Borough will have risen to the challenge of the climate crisis and improved its resilience to climate change.

It will have a wide range of good quality, affordable and energy-efficient housing that preserves the area's character and has positive effects on health, wellbeing, and general quality of life. Residents will feel empowered to support change through the planning process, helping to bring about more inclusive, contented, resilient, healthy and engaged communities.

The Borough will have grown economically but sustainably, creating high quality jobs, attracting new businesses, retaining and enhancing existing businesses, supporting opportunities to improve training and education and to retain skills and talent within the Borough, and so providing an adaptable and prosperous economy.

Infrastructure in West Lancashire will have been improved and focused on the places that need it, whether through new active and 'green' transport options within and into / out of the Borough (such as the proposed Skelmersdale Rail Link), upgraded utilities and communications, greatly expanded low carbon and renewable energy provision, enhanced education, and improved health, community and leisure facilities – all of which will have provided a better and healthier quality of life for those who live in, work in, and visit West Lancashire.

The Borough's three main settlements of Skelmersdale with Up Holland, Ormskirk with Aughton and Burscough will have continued to be the focus for new development. Each town will have built on its individual strengths and all three will have worked together to reduce inequality across the Borough by providing a well-rounded employment base, opportunities for business, the right housing mix and accessible opportunities for leisure and recreation. All three town centres will be more robust, diverse and vibrant, and in Skelmersdale's case regenerated, offering what people need in a mid-21st Century town centre.

In rural areas, villages and hamlets will have retained their rural character whilst acting as focal points for local services and appropriate employment, and for good quality affordable homes. The agricultural and horticultural industry will remain a focus in rural areas, having embraced new technology and nature-friendly practices.

The identity and unique landscape of West Lancashire will continue to be valued, enabling people to enjoy all that it offers. This will include the Borough's historic buildings and character; its wildlife, biodiversity and habitats of international, national and local importance; its regionally and nationally important high grade agricultural land and its network of green spaces and waterways. Martin Mere, the Ribble Estuary and other valuable habitats will be protected. Where there is flood risk, any new developments will have managed that risk appropriately. Tawd Valley and Beacon Country Parks will be green spaces of outstanding recreational and environmental value. Green travel will have become embedded through the development of linear parks and enhancement of the Leeds-Liverpool Canal.

Your Views

Do you have any comments on the proposed Vision for West Lancashire in 2040?

Please set out below anything you think should be changed? (Please bear in mind that the Vision should be achievable through Local Plan policies.)

Objectives

Objective 1: Addressing the Climate Emergency

To work proactively towards making a meaningful contribution to meeting national carbon reduction targets and responding to the Council's Declaration of a Climate Emergency. To promote and prioritise renewable energy and low (and zero) carbon development through greater emphasis on solar power, wind power, ground and air source heat technologies, localised district energy schemes and any other renewable technologies which may emerge, with carbon reduction and air quality as a priority. To reduce climate injustices (including fuel poverty) and ensure new developments are designed to mitigate and be resilient to climate change, including improved water and energy efficiency, protection against flood risk, and appropriate heating / cooling.

Objective 2: Sustainable Communities

To ensure sustainability is a guiding principle within our communities by providing a balanced mix of housing tenures and types, employment opportunities, infrastructure, access to services, transport and digital communications, and a connected and flourishing natural environment, and by working to meet as many as possible of the UN Sustainable Development Goals through planning policies, proposals and decisions.

Objective 3: A Healthy Population

To help improve the physical and mental health and wellbeing of the population of West Lancashire by encouraging a healthier lifestyle through the way that new development is planned and designed, by increasing and improving the network of active travel routes, green spaces, linear parks, allotments, waterways, and sport and recreation spaces across the Borough, and by improving access to health and community facilities. To tackle health inequalities, especially amongst young people, focusing on areas of social deprivation.

Objective 4: Reduced Inequality

To reduce inequality, by planning development and infrastructure with consideration to the more deprived areas of the Borough, and by working to improve social, economic and environmental equalities. To seek to encourage communities to be empowered, engaged, cohesive and diverse, and individuals to be independent for as long as possible.

Objective 5: A High Quality Built Environment

To ensure that new development is designed to a high quality, enhancing the Borough's local distinctiveness, protecting its historic features and settings, and that it is responsive to the climate emergency and the need to protect natural resources, to avoid pollution, and to reduce carbon emissions, ideally to zero.

Objective 6: The Right Mix of Housing

To provide a wide range of housing types and tenures in appropriate locations to meet the wide-ranging needs of West Lancashire’s growing population, including affordable housing, accommodation for older people, for students, and for those who live in residential caravans and house boats.

Objective 7: A Vitalized Economy

To provide opportunities for appropriate new development that will see the Borough continue to play an important role within the three City Regions by encouraging businesses to establish themselves in West Lancashire. To be flexible and able to embrace and make the most of ongoing changes in technology and in work practices (e.g. home working).

Objective 8: Vibrant Town and Village Centres

To enable the Borough’s town and village Centres to show resilience and to adapt to meet the challenges of online retail, permitted development rules and the effects of COVID-19, and to flourish and build on the vitality and vibrancy so valued at the heart of each community.

Objective 9: Accessible Services

To enable, encourage and plan for greater connectivity to a wide range of services to all parts of the Borough with an emphasis in providing ways of moving across the Borough as an alternative to car travel, making appropriate provision (or re-provision) of new facilities in the most accessible areas, and directing new development to accessible and sustainable locations.

Objective 10: A Flourishing Natural Environment

To improve and make the most of our ‘green and pleasant’ Borough by protecting and enhancing / aiding the recovery of its natural environment and biodiversity, by creating and improving a network of green spaces, waterways and connecting linear parks, by facilitating the visitor economy, by supporting the agricultural and horticultural industries, and generally enabling rural communities to thrive.

Your Views

What are your views on the proposed Objectives?

Should any be adjusted?

Should any be removed?

Should any others be added?

(Please provide comments below.)

Indicators for Local Plan 2040 Objectives

The indicators set out below are intended to help us measure whether the proposed Local Plan Objectives are being achieved. Some indicators may cover more than one Objective.

Objective	Proposed Indicators (data source in brackets)
<p>Objective 1: Addressing the Climate Emergency</p> <p>To work proactively towards making a meaningful contribution to meeting national carbon reduction targets and responding to the Council's Declaration of a Climate Emergency. To promote and prioritise renewable energy and low (and zero) carbon development through greater emphasis on solar power, wind power, ground and air source heat technologies, localised district energy schemes and any other renewable technologies which may emerge, with carbon reduction and air quality as a priority. To reduce climate injustices (including fuel poverty) and ensure new developments are designed to mitigate and be resilient to climate change, including improved water and energy efficiency, protection against flood risk, and appropriate heating / cooling.</p>	<ul style="list-style-type: none"> • Per capita reduction in CO2 emissions in the Local Authority area (Published by BEIS) • Number / Capacity of Renewable energy schemes granted planning permission (or installed) by type (WLBC) • SAP rating of Council dwellings (WLBC) • Number of new dwellings achieving zero carbon (WLBC) • Number of new commercial dwellings achieving BREEAM or comparable standards (WLBC) • Recorded incidents of flooding (LLFA, EA, WLBC) • No. of new permissions granted contrary to LLFA / EA advice on flooding / water quality (WLBC) • No. of new permissions granted that provide water efficiency improvements above national standards (WLBC) • [Measuring the domestic energy efficiency 'Performance gap'] (Developer & WLBC) • Proportion of households fuel poor (Published by BEIS) • Number of Air Quality Management Areas (WLBC)
<p>Objective 2: Sustainable Communities</p> <p>To ensure sustainability is a guiding principle within our communities by providing a balanced mix of housing tenures and types, employment opportunities, infrastructure, access to services, transport and digital communications, and a connected and flourishing natural environment, and by working to meet as many as possible of the UN Sustainable Development Goals through planning policies, proposals and decisions.</p>	<ul style="list-style-type: none"> • Types and sizes of new dwellings (WLBC) • Gypsy and traveller accommodation (WLBC) • Total number of employee jobs in West Lancashire (Business Register Employment Survey / Lancashire County Council) • Proportion of new developments within 1km of 5 key services (WLBC) • Proportion of new developments within 400m of bus stop / 800m of rail station (WLBC) • Length of new cycleways and other 'greenways' (Linear Parks, etc.) provided / improved (WLBC)

Objective	Proposed Indicators (data source in brackets)
<p>Objective 3: A Healthy Population</p> <p>To help improve the physical and mental health and wellbeing of the population of West Lancashire by encouraging a healthier lifestyle through the way that new development is planned and designed, by increasing and improving the network of active travel routes, green spaces, linear parks, allotments, waterways, and sport and recreation spaces across the Borough, and by improving access to health and community facilities. To tackle health inequalities, especially amongst young people, focusing on areas of social deprivation.</p>	<ul style="list-style-type: none"> • No. of customers taking part in health improvement facilities (WLBC) • Standardised mortality rates (male and female) (ONS) • Life expectancy at birth / at age 65 (ONS) • % of the population whose health is considered 'good' (ONS Census) • % of the population with limiting long term illness (ONS Census) • Length of new cycleways and other 'greenways' (Linear Parks, etc.) provided / improved.
<p>Objective 4: Reduced Inequality</p> <p>To reduce inequality, by planning development and infrastructure with consideration to the more deprived areas of the Borough, and by working to improve social, economic and environmental equalities. To seek to encourage communities to be empowered, engaged, cohesive and diverse, and individuals to be independent for as long as possible.</p>	<ul style="list-style-type: none"> • Deprivation rates (Contextual, Indices of MD published by Gov.uk) • Proportion of households fuel poor (Published by BEIS) • 'Attainment 8' scores for 'Key Stage 4' (GCSE) pupils (only available at Lancashire level) • Proportion of population with different level qualifications (ONS) • % of the population educated to degree level or higher (ONS) • Serious acquisitive crime numbers / rates (Police.uk) • Worklessness – proportion of JSA claimants (ONS)
<p>Objective 5: A High Quality Built Environment</p> <p>To ensure that new development is designed to a high quality, enhancing the Borough's local distinctiveness, protecting its historic features and settings, and that it is responsive to the climate emergency and the need to protect natural resources, to avoid pollution, and to reduce carbon emissions, ideally to zero.</p>	<ul style="list-style-type: none"> • Number of listed buildings / heritage assets lost (WLBC) • Number of listed buildings on 'At Risk Register' (WLBC) • Number of locally listed heritage assets (WLBC) • Area of brownfield land developed for housing / employment (WLBC) • Density of new residential development (WLBC)

Objective	Proposed Indicators (data source in brackets)
<p>Objective 6: The Right Mix of Housing To provide a wide range of housing types and tenures in appropriate locations to meet the wide-ranging needs of West Lancashire's growing population, including affordable housing, accommodation for older people, for students, and for those who live in residential caravans and house boats.</p>	<ul style="list-style-type: none"> • Annual, average no of net new homes (WLBC) • Five year supply of deliverable housing land (WLBC) • Housing delivery by spatial area (WLBC) • Average house prices (Contextual, DLUHC) • No. / % of affordable dwellings consented / delivered (WLBC) • First homes consented / delivered (WLBC) • No. Self-build / custom build homes delivered (WLBC) • No. of specialist housing units for older people consented / delivered (Class C2 / Class C3) complying with M4(2) (WLBC) • New 'dedicated' student accommodation provided (WLBC) • Gypsy and Traveller accommodation (WLBC) • Proportion of new homes on brownfield (WLBC) • Number of dwellings demolished / lost to non-domestic use (WLBC)
<p>Objective 7: A Vitalized Economy To provide opportunities for appropriate new development that will see the Borough continue to play an important role within the three City Regions by encouraging businesses to establish themselves in West Lancashire. To be flexible and able to embrace and make the most of ongoing changes in technology and in work practices (e.g. home working).</p>	<ul style="list-style-type: none"> • Amount of new employment land / floorspace developed annually (WLBC) • Amount of new employment floorspace developed in rural areas annually (WLBC) • Employment land developed for non-employment uses (WLBC) • Total number of employee jobs in West Lancashire (Business Register Employment Survey / Lancashire County Council) • Proportion of working age population in employment / unemployed (NOMIS) • Ratio of total jobs to working age population (job density) (NOMIS)
<p>Objective 8: Vibrant Town and Village Centres To enable the Borough's town and village Centres to show resilience and to adapt to meet the challenges of online retail, permitted development rules and the effects of COVID-19, and to flourish and build on the vitality and vibrancy so valued at the heart of each community.</p>	<ul style="list-style-type: none"> • Percentage of vacant units in Burscough, Ormskirk, Skelmersdale town centres (WLBC) • Net floorspace developed for town centre uses in centres / out of centres (WLBC) • Proportion of ground floor units in Ormskirk town centre in E Class use (WLBC) • Proportion of E Class units in Skelmersdale town centre (WLBC) • Proportion of ground floor units in Burscough town centre in E Class use. (WLBC) • Change in footfall in Ormskirk town centre (WLBC)

Objective	Proposed Indicators (data source in brackets)
<p>Objective 9: Accessible Services</p> <p>To enable, encourage and plan for greater connectivity to a wide range of services to all parts of the Borough with an emphasis in providing ways of moving across the Borough as an alternative to car travel, making appropriate provision (or re-provision) of new facilities in the most accessible areas, and directing new development to accessible and sustainable locations.</p>	<ul style="list-style-type: none"> • Proportion of new developments within 20 minutes' walk of a settlement / local centre (WLBC) • Proportion of new developments within 400m of bus stop / 800m of rail station (WLBC) • Proportion of new developments in main urban areas (WLBC) • Number of community services (e.g. public houses) lost to residential or employment development (WLBC)
<p>Objective 10: A Flourishing Natural Environment</p> <p>To improve and make the most of our 'green and pleasant' Borough by protecting and enhancing / aiding the recovery of its natural environment and biodiversity, by creating and improving a network of green spaces, waterways and connecting linear parks, by facilitating the visitor economy, by supporting the agricultural and horticultural industries, and generally enabling rural communities to thrive.</p>	<ul style="list-style-type: none"> • Number of Section 106 Agreements to mitigate harm to biodiversity; (WLBC) • Number of sites protected for their environmental / biodiversity / geodiversity value within the Borough. (LCC) • Number / proportion of planning permissions delivering biodiversity net gain to sites (WBLC) • % of watercourse length within the Borough with good to fair water quality (EA data)

Your Views

What are your views on the proposed indicators?

Should any be adjusted?

Should any be removed?

Should any others be added?

(Please specify which indicator(s) should be added, and for which Objective(s).)

If you suggest a new indicator, please provide the source of information that the Council could use to access the necessary data at a West Lancashire level (or below) and ideally at least annually. If we are unable to access the data, it is most likely the indicator cannot be used.

Policies

- **Strategic Policies**
 - Delivering sustainable development
 - Housing and employment land requirements, distribution of development
 - Climate change and environmental sustainability
 - Settlement boundaries, Protected Land and Green Belt
 - Strategic sites

- **Housing and Communities Policies**
 - Whereabouts housing can be located (general policy)
 - Housing site allocations
 - Using land efficiently – 'brownfield' versus 'greenfield' development; housing density
 - Dwelling sizes
 - Affordable housing
 - Housing for older people
 - Custom and self-build housing
 - Accommodation for students
 - Accommodation for caravan and houseboat dwellers
 - Accommodation for Gypsies, Travellers and Travelling Showpeople
 - Temporary agricultural workers' dwellings
 - Principles of 'place-making'
 - Preserving the Borough's heritage
 - Community Facilities

- **Economy and Employment Policies**
 - Employment areas
 - Employment site allocations
 - The rural economy
 - Town centres
 - Education: Edge Hill University, skills and training

- **Environment and Health Policies**
 - Preserving and enhancing the Borough's nature
 - Landscape and land resources
 - Flood risk and water resources
 - Contamination and pollution
 - Air quality
 - Green infrastructure, open space, trees, woodlands and hedgerows:
 - Healthy eating and drinking

- **Transport and Infrastructure Policies**
 - Transport networks and access
 - Parking standards and electric vehicle charging points
 - Digital connectivity
 - Low carbon and renewable energy
 - Energy efficiency in new developments
 - Water efficiency in new residential developments

- **Other Policies**
 - Sequential tests – where they are required and how to do them
 - Viability of development – what the Council will expect
 - Developer contributions

Schedule of proposed preferred and alternative Local Plan policy approaches to be consulted upon in the 'Issues & Options' consultation

Please note that policies ST02 (housing and employment land requirements, and distribution of development around West Lancashire), ST05 (strategic development sites) and policies on housing and employment site allocations will not form part of this consultation.

Please also note that whilst policies ST01 to ST05 are labelled 'strategic policies', there are policies in other sections that are also strategic.

ST01 – DELIVERING SUSTAINABLE DEVELOPMENT

Why is a policy needed?

National planning policy, as set out in the [National Planning Policy Framework](#), contains a 'presumption in favour of sustainable development', i.e. if a proposed scheme is judged to be 'sustainable' (as defined in the NPPF), it should usually be granted permission. Local plans need to repeat this policy.

We also need to set out which towns and villages in the Borough would be expected to accommodate most development in the future, and which should have the least. This is known as a 'settlement hierarchy'. This should be within an overall general policy at the start of the Plan.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Set out the settlement hierarchy for the Borough and repeat the 'presumption in favour of sustainable development' (as set out in the National Planning Policy Framework (NPPF))

The settlement hierarchy will be based on the findings and conclusions of the Sustainable Settlement Study 2021. The greatest amount of development, and the greatest range of development would be within the largest settlements at the top end of the hierarchy. (Actual housing numbers and amounts of employment land will be set out in Policy ST02.)

It makes most sense to put new development in places where there is already a good range of facilities, services, and infrastructure. Similarly, it is usually best to have less new development in areas with few services and facilities. (Sometimes new development can help sustain services in rural areas, or can help provide or justify better infrastructure.)

The NPPF presumption in favour of sustainable development is at the centre of national policy and is to be repeated in local plans.

Alternative approaches

Vary the Settlement Hierarchy

The only alternative to this policy would be to vary the settlement hierarchy from that set out within the Sustainable Settlement Study. Any changes could only be minor or else the policy would be out of line with the evidence behind it. Unless major new development could provide a range of services and facilities so that residents of the new 'site' could meet most of their day-to-day needs without having to travel to other settlements, this would not be 'sustainable' development and would go against other good planning principles.

The SA concludes that the more sustainable approach is to follow the settlement hierarchy as set out in the West Lancashire Sustainable Settlement Study 2021.

There is no scope from departing from the NPPF presumption in favour of sustainable development.

Your Views

Do you think we should:

- a) Stick to the 'settlement hierarchy' in the Sustainable Settlement Study, or
- b) Go for a different approach?

If you answered (b), what should the different approach be?

Is there anything in our policy approaches that you particularly support (or disagree with)?

Do you have any other comments on this topic?

Links

< [West Lancashire Sustainable Settlement Study 2021](#) >

< [National Planning Policy Framework](#) >

< [Consultation / policies](#) >

Note – there is no Policy ST02 at this stage (housing and employment land requirements, and distribution of development around West Lancashire)

ST03 – Responding to the Climate Emergency and Creating Environmental Sustainability

Why is a policy needed?

The Government has committed to achieving net zero carbon emissions by 2050, and national planning policy (NPPF) expects Councils to adopt pro-active strategies to mitigate and adapt to climate change, in line with the Climate Change Act 2008 and Planning and Compulsory Purchase Act 2004 (Section 19). In addition, in 2019, West Lancashire Borough Council declared a Climate Change Emergency, setting out a Vision to achieve carbon neutrality by 2030. In doing so, the Council has recognised the Local Plan as a key delivery mechanism for mitigating and adapting to climate change.

As well as responding to the climate emergency, there are further challenges in relation to reversing biodiversity loss, and the Government has announced a legally binding target to halt the decline of nature by 2030. This will be underpinned by the statutory measures of the Environment Act, including Biodiversity net gain.

There is currently no over-arching strategic policy relating to climate change or environmental sustainability in the current Local Plan. To conform with national legislation and requirements, Local Plans should have climate change and the conservation and enhancement of the natural environment as key parts of their strategic policy.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Introduce a new strategic policy

This approach would see the introduction of a new strategic policy covering climate change and environmental sustainability. It is expected that the preferred approach would set the overall strategic direction, with detail provided through individual policies.

The policy would help support ambitions to achieve net zero by embedding climate and environmental sustainability considerations at the heart of all development proposals. This could include setting out support for specific measures which could include:

- low carbon and renewable energy generation,
- reducing vehicle emissions
- encouraging a shift away from private car to active and sustainable travel

- improving energy and water efficiencies in new buildings
- maximising opportunities to improve green infrastructure, wildlife habitats and biodiversity net gain, and
- minimising flood risk.

This approach would help to positively mitigate and adapt to climate change, and would support many of the UN Sustainable Development Goals. The Council's Sustainability Appraisal considered that this option would be the most practical strategic approach to pursue environmental sustainability.

Alternative approaches

1. Have no strategic policy

This approach would be similar to the current Local Plan - there would be no strategic policy governing climate change and environmental sustainability. It would fail to put the climate and biodiversity emergency at the heart of all development proposals, and would be out of line with national requirements.

2. Introduce a more prescriptive policy

This approach would set detailed requirements through the strategic policy. However, containing all climate change and environmental considerations under one policy would create a very long policy and could detract from the 'strategic' direction.

Your Views

Do you agree that the climate and biodiversity emergency should be central to the Local Plan?

Yes / No
Additional Comments field

Is there anything in our policy approaches that you particularly support (or disagree with)?

Which of our options do you most closely support?

- A strategic policy
- No policy
- A more prescriptive policy
- Something else (please specify what)

Do you have any other comments on this topic?

Links

< Draft policy text >

< Evidence >

- < Climate change thematic paper / technical paper >
- < Evidence studies homepage >

< Consultation / Policies home page >

ST04 – SETTLEMENT BOUNDARIES, PROTECTED LAND AND GREEN BELT

Why is a policy needed?

We need to set out what types of development will be allowed within settlements, and what will be allowed in the countryside outside of settlements. Much, but not all, of the rural area in West Lancashire is 'Green Belt', a national policy designation. The other rural land has been called 'Protected Land' in previous Local Plans; we need to look at whether we carry on with the same approach for Protected Land, or whether we change it.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Set out what will be allowed within and outside of settlement boundaries. On the whole, carry on with the current [West Lancashire Local Plan \('WLLP'\)](#) approach, but relax Protected Land policy a little.

Within settlement boundaries, this policy will allow development as long as it is in line with other Local Plan policies. For example, we would prefer brownfield land (= land that has been built on previously) to be developed before greenfield land (= land that has not been built on previously, and / or land used for horticulture and agricultural buildings). The policy would also require good 'place-making' principles to be followed.

Outside settlement boundaries, land will either be designated as Protected Land or Green Belt. The policy for Protected Land would be similar to the most recent approach (WLLP policy GN1(b)), except that more types of housing will be allowed, including all categories of housing permitted in the Green Belt. Green Belt policy would follow national policy (there is no scope to vary this to any great extent).

It is considered better to continue with the approach we've used in recent years, allowing appropriate new development within towns and villages, and restricting it in the countryside. The proposed changes to Protected Land policy are to make sure it is no more restrictive than Green Belt policy. The Sustainability Appraisal concludes that the preferred approach is more sustainable than the alternative approaches.

Alternative approaches

1. Do away with the Protected Land designation.

Rather than have a countryside designation that is different from Green Belt, remove the Protected Land designation altogether. Current Protected Land would be either be treated as greenfield sites within settlements in the new Local Plan, or it would become Green Belt land. (To become Green Belt land, we would need to demonstrate that the site fulfils at least one of the five 'Green Belt purposes' set out in national policy.)

The advantage of this approach would be to make policy simpler by only having one policy for the countryside. The disadvantages include the threat of losing greenfield land and / or horticultural businesses and jobs (a significant proportion of Protected Land is currently used for horticulture) to more lucrative housing. Much of the Protected Land is either in Flood Zone 3 (around Banks) or is around Tarleton and Hesketh Bank, where road capacity is limited, so it may not be appropriate to build there.

Protect greenfield land within settlement boundaries more strongly.

This alternative approach would make it much more difficult to build on greenfield land within settlement boundaries. There could be a requirement for some sort of 'sequential test' so that greenfield sites can only be built on if it is shown that it is unrealistic or unviable to develop brownfield land sites first. This approach could be followed at the same time as the first alternative, so that former Protected Land sites are less easy to develop.

The advantage of this alternative approach is that it is likely there would be more greenfield land left within settlements, potentially giving health and nature benefits. Disadvantages include a possible stifling of development, and a knock-on need to allocate more land outside settlements to meet housing, etc. needs. Also, it may be very difficult to enforce a policy that gives priority to brownfield land development.

Your Views

What policy approach do you think we should follow within settlements (e.g. allow more, restrict more)? Please explain why.

What balance do you think there needs to be between building on 'brownfield' and 'greenfield' land? How could we make a 'brownfield first' policy work in reality?

For Protected Land, do you think we should

- a) Continue with the same approach as in the current Local Plan?
- b) Relax the policy so it is a little less restrictive than Green Belt policy?
- c) Do away with the policy altogether?
- d) Do something else (please state what)

Tick-boxes and space for free text...

Do you have any other comments on this topic?

Links

< [West Lancashire Local Plan](#) >

< [National Planning Policy Framework](#) >

< Consultation / policies >

Note

There is no policy ST05 (Strategic Development Sites) at this stage.

Please also note that although policies ST01 to ST05 are labelled 'strategic policies', there are policies in other sections that are also strategic.

HC01 – HOUSING POLICIES (10 policies)

HC01a – WHERE HOUSING CAN GO

Why is a policy needed?

Helping ensure that housing and other accommodation is provided for different people is one of the main roles of a Local Plan. Different people need different kinds of places to live, each with their own characteristics and issues, and so a set of policies are needed on housing. This 'housing policies' section has 10 distinct policies. Some of these may be merged in the final Local Plan, and there will also be at least one additional policy on housing site allocations.

This first policy is a general one, setting out where the Council would normally allow new housing, and where it would be restricted.

In the Delivering Sustainable Development policy [< link >](#), we look at whereabouts in West Lancashire we should have new development, including housing. It is generally accepted that new housing should be allowed within settlements (provided it is appropriate in design and siting, and doesn't undermine other policies). We also need to consider whether we allow the same types / amounts of housing in every settlement, or whether our policies should be more restrictive for smaller villages than for towns and larger villages. In some areas, new housing should not be permitted at all, either because of the characteristics of the land (e.g. a nature conservation site) or because of its location (e.g. isolated areas, far from facilities and services). Much of rural West Lancashire is Green Belt – we need to think carefully about what housing should be allowed there, and also in other countryside.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Allow housing within settlements outside the Green Belt (as long as it is in accordance with other Local Plan policies), more in the larger towns and less in the smaller villages.

In the Green Belt, only allow housing where national policy permits it. This would include limited affordable housing to meet local needs on 'Rural Exception Sites' adjacent to the edge of certain specified villages. On other non-Green Belt countryside (i.e. Protected Land), allow similar types of housing to those allowed in the Green Belt, as well as limited affordable housing (up to 10 units).

This policy links to the first Strategic Development Policy ('Delivering Sustainable Development') [< link >](#) but refers specifically to residential development only, rather than to any kind of development.

The benefits of this approach are that most housing would tend to be built in the larger settlements which have a better range of services and facilities. Smaller settlements would naturally take fewer houses as there are fewer potential sites there. The Sustainability Appraisal concludes that this is the most sustainable of the four suggested approaches. The overall distribution of housing will depend also on where new housing sites are allocated. (This will be done at the next stage of preparing this Local Plan.)

Alternative approaches

1. Continue with the [West Lancashire Local Plan](#) ('WLLP') current approach

Allow housing in all non-Green Belt settlements, but with limits on site size for the smallest settlements. In the Green Belt, allow up to 4 affordable dwellings and any other housing permitted by national policy. On Protected Land, only allow limited affordable housing up to 10 units.

This alternative would mean a consistent approach is followed over time (over two Local Plan periods), but it means that Protected Land policy would be more restrictive in some respects than Green Belt policy, and that affordable housing could, in theory, go anywhere in the Green Belt.

2. Be more restrictive than under current WLLP policy

Limit the numbers and / or types of housing in smaller settlements, for example only affordable housing in the smallest non-Green Belt settlements. Allow nothing on Protected Land, and nothing in the Green Belt apart from what national policy permits.

This approach could stifle housing growth in some areas, and could prevent some smaller settlements from growing 'organically'. However, it could also be argued that it would promote more 'sustainable' forms of development by restricting new housing in places with few facilities and services.

3. Be less restrictive than under current WLLP policy

This approach would set no limits on the types or amount of housing allowed within settlements. It would allow housing on 'Protected Land' just like on any other greenfield site, and would allow housing on 'rural exception sites' in the Green Belt. It would also consider all clusters of houses (say 15 or more) in the Green Belt as 'villages', which would mean that 'limited infilling' would be allowed in such places in accordance with national policy.

The advantage of this approach would be extra housing across the Borough, including in rural areas. But this would come at a cost, e.g. in terms of the natural environment, landscape and land resources, and in some places would not represent 'sustainable development'.

Your Views

What do you think is the best approach towards where housing can go, and why?

- Preferred Approach – housing in settlements, follow national policy in Green Belt, Protected Land to be similar to Green Belt
- Alternative 1 – same as in current Local Plan
- Alternative 2 – more restrictive
- Alternative 3 – less restrictive
- Some other approach (please specify)

What are your views on housing in the Green Belt (for example 'rural exception sites')?

Is there anything in our policy approaches that you particularly support (or disagree with), or do you have any other comments on this topic?

Links

< [West Lancashire Local Plan](#) >

< Consultation / policies >

HC01b – USING LAND EFFICIENTLY

Why is a policy needed?

This policy area looks at how strong a line the Council should take with regard to building on 'brownfield' (previously built-on) sites before 'greenfield' (not previously built-on) sites. [National planning policy](#) encourages a 'brownfield first' approach, but is not very strict. Building on a brownfield site means we should need less greenfield land to meet our needs. Brownfield sites can often be in good locations in settlements, near to facilities. On the other hand, it is often more expensive or more complicated to redevelop brownfield sites, especially where there are issues like contamination. And sometimes brownfield sites can have high nature conservation value.

Housing density is another matter where it is useful to have a policy. National planning policy encourages the 'efficient use of land' including minimum densities in certain areas. But we need to bear in mind that some areas are better suited to higher (or lower) density development than others. The Covid 19 'lockdown' highlighted the desirability of providing adequate gardens and open space, as well as encouraging nature in urban areas; this may affect how we approach densities in future.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Broadly follow national planning policy

Encourage the development of brownfield sites in preference to greenfield sites wherever possible (in particular for housing), but recognise that the need to ensure schemes are viable is a factor, and recognise that some brownfield sites can have value (e.g. in terms of nature conservation).

For housing density, a minimum density standard would be set, expected to be 30 dwellings per hectare, subject to the characteristics of the site in question. (So lower densities may be allowed on some sites, where judged appropriate.) Higher densities – say 40-50 dwellings per hectare - would be expected on urban sites with good public transport access.

The advantages of this approach include being consistent with national policy, but allowing for some flexibility to suit local circumstances.

Alternative approaches

a) Brownfield land development

1. Have no preference for brownfield land over greenfield land development,

Have no requirement in the Local Plan to try and develop brownfield sites before greenfield sites.

The disadvantage of this approach is that it could lead to brownfield sites being 'left' whilst the more attractive (to developers) greenfield sites are built on. This would be unlikely to help urban regeneration over the Local Plan period, even if more homes are provided overall.

2. Have a more rigorous 'sequential' or even 'phased' approach towards brownfield land development,

Require all suitable brownfield sites within a settlement to be carefully and realistically considered for development first, before allowing greenfield sites to be built on. This approach would need to be in line with national policy requirements on viability, i.e. it may be possible to reject some brownfield sites if it's shown that redeveloping them would be unviable, even if such things as affordable housing requirements, etc. were relaxed.

The advantage of this approach would be an increased likelihood that urban brownfield sites would be redeveloped, hopefully encouraging regeneration and sustainable development. The disadvantage is that housing development could be held back, and the policy even challenged as being unreasonable.

b) Density

1. Require the same housing density for all areas, using the 'standard' 30 dwellings per hectare cited in national advice regardless of a site's location or characteristics. Whilst this would make things simpler, it doesn't reflect the fact that sites can be very different, and that a 'one size fits all' approach is unlikely to be appropriate in terms of density.

2. Push for higher densities on all sites (say a minimum site density of 35 dwellings per hectare) in order to reduce the amount of land needed for building new homes. This option was concluded to be the most sustainable in the Local Plan Sustainability Appraisal. However, it is expected the increase in density would predominantly come at the cost of garden sizes, going against public opinion on the importance of having good private outdoor space, following the first Covid-19 'lockdown'. This approach may require a more relaxed attitude, policy-wise, in terms of allowing off-site open space rather than insisting it be provided as part of a development site.

3. Allow / require lower density development on all sites in order to give people larger garden areas and / or more publicly accessible open space / space for nature (e.g. to fulfil biodiversity net gain requirements). For some sites, have a lower minimum density requirement, or even no minimum density requirement.

Whilst this approach may lead to pleasant developments with large gardens and plenty of open space, it could require a lot more land to meet the Borough's development needs, and could lead to loss of countryside and greenfield land. It may go against the national policy requirement to make effective use of land.

Your Views

Which do you think is the best approach towards building on brownfield and greenfield sites?

Are there any particular brownfield sites that you consider would make good housing sites?

Should we try and use as little 'new' land as possible for housing by requiring high density development, or should we encourage more gardens and open / natural space in new developments and allow for lower densities?

(Please mark on a sliding scale)

Should we vary our density policy in different parts of West Lancashire? Why / why not?

Do you have any other comments on this topic?

Links

< [NPPF](#) >

< Consultation / policies >

HC01c – DWELLING SIZES

Why is a policy needed?

It is most likely that the majority of people aspire to living in a large house. Parents, or parents-to-be, generally prefer each child to have their own bedroom. There is often a desire for a spare room, either for visitors, or for use as a home office (all the more so following the surge in home working as a result of Covid 19). Many developers prefer to build larger, more profitable 'executive' type homes. And a significant number of people are living in properties larger than they need (for example 'empty nesters') and would like to 'downsize' into a smaller property for their later years.

We need an appropriate balance of house sizes in new developments in order to help address local needs. Previous consultation results and the Council's evidence base indicate that in most areas, the greatest unmet need is for smaller dwellings, in particular for 'downsizers' as the general population ages. The mix of housing needed varies by area, based on what already exists there. For example, Skelmersdale has a high proportion of 3 bed properties.

New housing built over the plan period only makes up a small proportion of the overall housing stock. To simply 'balance the supply', the dwelling size mix required could lead to unrealistic policy demands. We also need to take into account the viability of different housing mixes and to 'trade this off' against other desired features (such as adaptable and energy efficient dwellings), and the Community infrastructure Levy. So the mix of new dwelling sizes can only go some way towards balancing the Borough's housing stock, but a policy on this can still help.

What UN Sustainable Development Goals does this policy contribute to?

3 GOOD HEALTH
AND WELL-BEING



11 SUSTAINABLE CITIES
AND COMMUNITIES



16 PEACE, JUSTICE
AND STRONG
INSTITUTIONS



Our preferred approach

Have a required mix of dwelling sizes for new developments, based on the Council's evidence base* * (i.e. the Housing and Economic Development Needs Assessment study, and the Local Plan Viability Assessment).

The mix would specify W% of one-bed, X% of two-bed, Y% of three bed, and Z% of 4+ bed properties, or else a range (say within 10% so, for example 15-25% two-bed properties). The percentages would apply across the whole Borough, as we do not have the evidence base to justify different sub-Borough percentages.

This mix would be the starting point for negotiation when considering housing schemes, but we would allow for variations if the developer provided robust evidence of local housing needs and demand, or if there were other relevant considerations.

The advantage of this approach is that it would help balance the Borough's housing stock and deliver what is needed in the Borough, rather than what is wanted by developers. It would also have an element of flexibility, and was concluded to be the most sustainable option in the Sustainability Appraisal.

Alternative approaches

1. Exercise no control over dwelling sizes

Subject to other policies being satisfied, e.g. on separation distances and residential amenity, let the developers build what they want. This broadly represents the approach so far (although dwelling sizes are 'guided' for affordable housing developments) and would be simpler for developers. However, it would be unlikely to help balance the housing stock in the Borough.

2. Exercise strict control over dwelling sizes

Set out the required proportions of different-sized houses on each site, not allowing for any variation apart from in exceptional circumstances.

Whilst this approach may go the furthest (of the three alternatives) in helping balance the Borough's housing stock, it would not be possible to respond to changing housing needs over time. The policy could be over-onerous and could lead to challenges from developers.

Your Views

What are your views on a policy on dwelling sizes? Should the Local Plan try and influence the size of new homes? Why / why not?

Which of the three approaches would you say is most appropriate?

- A required housing mix based on the Council's evidence base
- No policy on dwelling sizes
- A stricter policy on dwelling sizes

Feel free to give reasons for your answer

If there were no policy on dwelling sizes, how would you suggest the Borough's housing stock be better balanced?

Should the Council adopt the [Nationally Described Space Standards](#)? Please give reasons for your answer.

Links

< Local Plan Evidence Base > (Put a link to the HEDNA if it is approved by 18 November)

< Consultation / policies >

HC01d – AFFORDABLE HOUSING

Why is a policy needed?

The affordability of housing, especially for people wanting to get onto the housing ladder, has been a pressing issue for years, not just in West Lancashire. Affordability is influenced by earnings, debt, mortgage availability, house prices, and housing supply. Evidence has shown that building more properties does not bring prices down, but the market needs influencing in order for properties to be priced at a more affordable level. The standard approach towards providing affordable housing – as used in the current [West Lancashire Local Plan](#) - is to encourage 100% affordable housing schemes, and to require that a percentage of homes in new market housing developments be affordable.

The government revised the definition of affordable housing in 2018 and 2019 to include a wider range of housing types, for example discount market homes. The result is that some types of 'affordable housing' have less of an impact on builders' viability, but are not genuinely affordable for buyers. Tenures such as social rent are more genuinely affordable to the occupier, but have a greater impact on viability. A trade-off is often required between a smaller number of more affordable properties, and a greater number of less affordable properties.

Affordable housing need varies across West Lancashire. In particular, Skelmersdale has different characteristics from the rest of the Borough. Historically, the number of affordable homes delivered has fallen far short of actual needs, although numbers have picked up in the last couple of years. There is a need for a policy in order to try and deliver as many of the right type of affordable homes in West Lancashire as possible.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Continue the general policy approach followed over recent years in West Lancashire

Support 100% affordable housing schemes, and require that a percentage of homes in developments of 10 or more dwellings be affordable. 100% affordable housing schemes would also be allowed on 'rural exception sites' (see policy HC01a [< link >](#)) adjacent to the edge of certain settlements.

The policy would make a distinction between Skelmersdale and other areas (i.e. less affordable housing is required in Skelmersdale) in the light of the Council's evidence base and the general lower viability of development in Skelmersdale.

The policy would aim to procure a mix of affordable housing types (both rented and owned / part-owned) and would follow national policy, for example with regard to First Homes, and the need to ensure viability.

The advantage of this approach is there would be consistency over time, and consistency with national policy.

Alternative approaches

Policy options are constrained by the national requirement to take viability into account. The main options are:

1. Go for the minimum amount of affordable housing

The minimum amount of affordable housing would be 10% on schemes of 10 units and above, as per [National Planning Policy Framework](#) paragraph 65. The money 'saved' in this approach would be used for other 'benefits' e.g. 'green' housing features (energy efficiency, or provision of features to aid wildlife), and / or infrastructure.

The advantage of this approach is to improve viability and deliver other benefits; the disadvantage is that fewer affordable homes would be provided.

2. Go for the greatest possible amount of affordable housing

This would be at the expense of other 'good-to-haves', i.e. affordable housing would be the top priority in the 'viability hierarchy' (see policy OT02 [< link >](#)).

The advantage of this approach would be that more affordable housing units would be likely to be delivered. The disadvantage would be a likelihood that other 'desirable outcomes' would be less likely.

Your Views

What do you think is the most important type of 'affordable' housing we should provide – please rank the types below (1 – highest priority; 4 – lowest priority)

- Social rent (properties rented from the Council or a Registered Provider)
- Affordable rent / discount market rent (properties rented from a different body, but at a price below the market rent price)
- Shared ownership (occupiers pay some rent, and also pay towards purchasing a 'share' of the property)
- Low-cost (i.e. discounted) home ownership – homes for sale at below market value. This discount is passed on when the property is sold. This includes 'First Homes'

Different types of affordable housing cost more (to the developer) to provide. Social rent costs the most to the developer, but is the most affordable to the occupier. Discounted market housing costs least to the developer, but is least affordable to the occupier. Which type should we go for?

- A smaller number of more affordable 'social rent' properties
- A larger number of less affordable 'low-cost ownership' properties
- A mix of the two
- Vary the requirement site-by-site according to each case's circumstances

Affordable housing is one of several 'desirables' coming off the back of new housing; there are only so many 'desirables' that can be provided whilst keeping schemes viable. What priority should affordable housing have in relation to:

Energy and water efficiency, and other 'green' measures? Greater / less / the same

Adaptable homes so they can meet different people's needs? Greater / less / the same

Providing an appropriate mix of dwelling sizes? Greater / less / the same

Do you have any other comments on this topic?

Links

< NPPF >

< First Homes > <https://www.gov.uk/guidance/first-homes>

< Consultation / policies >

HC01e – HOUSING FOR OLDER PEOPLE

Why is a policy needed?

The average age of West Lancashire's population is increasing, and the number of people aged over 75 is projected to grow considerably by 2040. Whilst many people are able to lead active lives in a 'mainstream' property until a very advanced age, other older people require a specialist property, possibly with onsite care, for physical and / or mental health reasons. It is reasonably straightforward to build new homes in such a way that they can be easily adapted to meet the changing needs of an ageing occupant, but harder to 'retrofit' existing properties to make them adaptable. There is a desire for suitable 'downsizer' properties for older people.

Just as older people differ widely in terms of their needs and lifestyles, so the accommodation needs of older people differ widely. A Local Plan policy is considered necessary to set out these different housing needs, and to try and bring about their delivery.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Support the provision of accommodation suitable for older people in appropriate locations

These 'appropriate locations' would be within settlements, with easy access to services / facilities / public transport. Aim for independent living as a first preference, and for mixed communities, rather than 'enclaves' of older people's housing.

The policy would require that all new properties meet accessibility / adaptability standards as set out in [Building Regulation M4\(2\)](#), and also that a small proportion of dwellings meet [Regulation M4\(3\)](#) (wheelchair accessible dwellings).

The policy would also support the development of care home / extra care accommodation in appropriate locations around the Borough. It would allocate specific sites to provide for a set number of care home bedspaces to meet identified needs.

The advantage of this approach would be to cater for a variety of older people's accommodation needs, in accordance with the Council's evidence base.

Alternative approaches

1. Have no prescriptive policies on provision of housing for older people

There would be no policy for older people's accommodation in the Local Plan, but rather let the market deliver housing for older people as it sees fit. It would be expected that as the population generally ages, demand for housing for older people will increase.

This approach would be less likely to deliver any significant amounts of accommodation suitable for older people, unless the market were to change significantly from now. There is little evidence of suitable properties being delivered 'voluntarily' at present. It is considered there is a need for the market to be influenced by planning policy, at least in the short term.

2. Seek to achieve as much housing as possible for older people

This would be through requirements for adaptable homes on all new dwellings, requiring that a percentage of homes on large new housing sites be designed specifically for older people, and allocating sites for care homes / extra care developments. This is similar to the preferred policy option, but 'stronger'.

The advantage of this option would be a likelihood of more accommodation for older people being delivered, but it is likely to be at the expense of other 'good-to-haves' such as affordable housing, or energy efficiency. As with several aspects of housing policy, there are competing priorities which need to be balanced against one another. These will be looked at in the viability policy [< link >](#)

Your Views

How important is it to provide housing for older people, compared with other housing needs?

(Sliding scale: 1 – Least important; 10 – Most important)

Which of the policy options above would you prefer?

- Support the provision of accommodation suitable for older people in appropriate locations (the 'preferred approach' above)
- Have no policy, but let the market deliver such housing where it is desired
- A stronger policy
- Something else (please specify what this is below)

In what ways do you think we should try and ensure the provision of housing for older people?

(Free text)

Do you have any other comments on this topic?

Links

< [Building Regulations Part M](#) >

< Consultation / policies >

HC01f – CUSTOM AND SELF-BUILD HOUSING

Why is a policy needed?

The government strongly supports the principle of self-build and custom-build housing ('SCB' housing). ('Custom build' is where the occupant chooses the design of all or part of the dwelling and employs someone to build it for them.) This type of housing contributes towards meeting overall housing needs and can lead to innovative design. SCB housing may be classed as 'affordable' in certain instances. If the necessary finance is secured (which is difficult, but possible), a self-built property is usually worth a lot more, once complete, than what the occupant owes for it (i.e. it has good equity).

Local authorities are required to maintain a register of people wanting to build their own property, and to ensure an equivalent number of self-build plots are granted permission over time. The Register can indicate demand for CSB housing and justify the need for policies on providing CSB housing. (True demand is likely to be higher than the numbers on the Register.)

Very little 'true self-build' housing has been delivered in West Lancashire, and no land has been allocated here for such housing. It is considered there is a need for a positive policy to help ensure that CSB plots are provided for sale to help meet demand.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

A specific policy on self- and custom-build housing.

This preferred policy approach would be more positive towards Custom and Self-Build housing than in previous local plans in West Lancashire. It would involve requiring that a percentage of the plots on large housing sites (say 100 units and over) be set aside for Custom and Self-Build housing. These plots would be serviced and offered at a reasonable price on the open market; if not taken up after a specified time, they could revert to general market housing.

In addition, a number of small to medium size sites would be allocated specifically for SCB housing.

On rural exception sites, affordable Self and Custom Build properties would be permitted, subject to conditions. (There are complex considerations in working out how affordable SCB housing ties in with Council procedures on affordable housing so such a policy would require careful thought.)

The advantage of this policy approach is that CSB plots should be guaranteed to be delivered, or at least made available for sale. The disadvantage is that there may be opposition from some developers to having CSB plots on their sites, especially if these plots are not taken up.

Alternative approach

Have no Local Plan policy on Custom and Self-Build housing

The Local Plan would express general support in principle for CSB housing but would have no policy specifically requiring CSB plots to be provided. Instead, this would be left to the market to deliver. This is similar to the current WLLP policy approach.

The disadvantage of this approach is that, based on what has happened over recent years under current policy, it is unlikely to deliver any CSB plots for sale to people on the Council's CSB Register, and the Council could be accused of failing to meet identified CSB needs.

Your Views

Should we have policies for the provision of self- and custom-build housing or just let the market deliver it? Please explain your answer.

If we are to provide self- and custom-build housing, how should our policies seek to do this?

Do you support the following?

- **Requiring a percentage of plots on large allocated housing sites to be made available for CSB housing (Y / N)**
- **Allocating sites specifically for CWB housing (Y / N)**
- **Allowing affordable CWB properties on rural 'exception sites' (Y / N)**

Do you have any other comments on this topic?

Links

< NaCSBA website > <https://nacsba.org.uk/>

< Consultation / policies >

HC01g – STUDENT ACCOMMODATION

Why is a policy needed?

Edge Hill University in Ormskirk has expanded significantly since 2000 and is a flourishing, successful university. The Council granted planning permission in 2011 for over 700 more rooms on the campus. Since then, several other speculative student accommodation developments have been built or permitted in and around Ormskirk town centre. Together, these appear to have met any increase in demand for student accommodation that has arisen over the past decade.

Student accommodation has also been provided in houses in multiple occupation (HMOs). Over 400 houses in Ormskirk have been converted to HMOs, mostly prior to 2011. This has sometimes led to social cohesion issues in certain streets. The Council introduced restrictions on the spread of

HMOs in 2011 and 2013, limiting the percentage of HMOs to 5, 10 or 15 per cent in different roads in Ormskirk, Aughton and Westhead. This policy has worked well and has generally been popular. Recent anecdotal evidence suggests that demand for HMOs is now waning, with a significant number of unlet rooms.

Edge Hill University has indicated to the Council in representations on the (abandoned) Local Plan Review in 2018 that it is likely to have a need for more accommodation in the medium to longer term. A policy is needed to continue to manage the HMO issue, and to deal with any future increase in demand for student accommodation.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Continue the current approach towards student HMOs that has been in place since 2012/13 and permit purpose-built student accommodation on the Edge Hill University campus, and on a small number of specific sites in Ormskirk town centre.

This has been considered a generally successful approach. An 'Article 4 Direction' (a legal tool the Council can use in certain circumstances) in Ormskirk, Aughton and Westhead means that planning permission is needed to convert a dwelling house to an HMO in these settlements. Current [Local Plan policy < link to WLLP policy RS3 >](#) sets limits on the percentage of properties that can be HMOs in different streets. The new policy would involve minor alterations to this approach, including reducing the percentage of HMOs permissible on most streets, with some streets set at 0% HMOs.

Student accommodation would be allowed on the University campus (in non-Green Belt areas). It would also be one of the possible permissible uses on a small number of specific 'development opportunity' sites in or adjacent to Ormskirk town centre. These would be subject to conditions on amenity of nearby residents. Elsewhere, student accommodation development would be restricted.

The advantage of this approach is it would allow for a limited amount of additional accommodation, and would continue the current successful policy towards HMOs in Ormskirk. A possible disadvantage is it may be inflexible towards changing needs in the future.

Alternative approaches

1. Have a more relaxed policy approach towards student accommodation than at present in the WLLP.

Remove or lessen controls over the conversion of properties to HMOs (either by revoking the Article 4 Direction currently in place in Ormskirk, Aughton and Westhead, or by increasing the percentage limits in the different streets in this area).

Allow for purpose-built student accommodation developments within most parts of Ormskirk, rather than just on a small number of specific sites.

This approach would allow for more student accommodation, but could cause or worsen issues such as the potential for antisocial behaviour and change in character in some streets, and a shortage of affordable and reasonably-priced housing for families in Ormskirk.

2. Go for a tighter policy approach compared with the current WLLP.

This approach would allow no more HMOs within the Article 4 Direction area of Ormskirk / Aughton and Westhead. The Article 4 Direction could be extended beyond Ormskirk (e.g. to Burscough, Skelmersdale, and even the Northern Parishes [although HMOs in that area are unlikely to be for students]).

The policy would restrict purpose-built student accommodation development to the University campus only (non-Green Belt parts of the Campus) and not allow it in Ormskirk Town Centre.

The disadvantage of this approach would be that there would be very little scope for any more student accommodation and very limited opportunity to respond to any changing needs in future, possibly influencing the long-term prospects for Edge Hill University. An advantage would be a likelihood of more family housing (eventually) being available in Ormskirk and possibly elsewhere.

Your Views

What approach should we take towards HMOs?

- More relaxed than now
- Similar to now
- Stricter than now.

Please explain the reason(s) for your answer.

Where should we allow new purpose-built student accommodation (if needed)?

Please tick all that apply

- Nowhere
- EHU campus
- Expansion of EHU campus
- As one of several possible uses on a limited number of specified / allocated sites in Ormskirk Town Centre
- Anywhere in Ormskirk Town Centre, subject to criteria being satisfied
- Anywhere in Ormskirk, subject to criteria being satisfied
- Elsewhere (please specify where)

Do you have any other comments on student accommodation and HMOs?

Links

< WLLP policy RS3 >

< Consultation / policies >

HC01h – CARAVAN AND HOUSEBOAT DWELLERS

Why is a policy needed?

Some people choose to live not in 'bricks and mortar' housing, but in caravans (Gypsies and Travellers are covered in policy HC01i) or on (canal) boats. There are several substantial caravan sites in the Borough, for example at Banks, Scarisbrick and Simonswood, and three canal marinas – two at Rufford and one at Scarisbrick. All of these areas are within the Green Belt, and are subject to Green Belt policy.

The Council's evidence base does not indicate any significant increasing demand for caravan or houseboat accommodation in the Borough that would warrant any new site allocations or the removal of land from the Green Belt for this purpose.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Have no specific policy or site allocations for caravans or houseboats

The Council's evidence base does not indicate any significant / increasing demand for caravan or houseboat accommodation in the Borough that would warrant any new site allocations or the removal of land from the Green Belt for this purpose.

With this in mind, it is considered that the best approach would be to continue with the current WLLP policy approach, i.e. support the rural economy in general, and treat proposals for expansion or enhancement of facilities on their merits, in accordance with 'the usual' policies (e.g. on Green Belt).

Alternative approaches

1. Plan positively for houseboat and residential caravan developments

Have a permissive policy on new or expanded caravan / marina sites, and allocate specific pieces of land for such uses, even taking them out of the Green Belt if necessary / possible, to allow more 'freedom' in their development.

This would improve opportunities for expanding the visitor and tourist economy in West Lancashire, but could come at the expense of encroachment into the countryside. Taking land out of the Green Belt may mean it becomes vulnerable to other types of development that may not be appropriate (or 'sustainable') in such a location, e.g. housing.

2. Plan less positively for caravan / houseboat development

Restrict such uses in the Green Belt in order to preserve its openness, and only permit development where a good number of facilities are close by.

Whilst this would better protect the countryside, it would constrain the visitor and tourist economy.

Your Views

How should we help caravan or boat dwellers meet any additional accommodation needs?

- Continue as present with no specific policy but let 'market forces' deliver the necessary accommodation
- Introduce a policy specifically for caravan and boat-based accommodation? (Note – this will need to be in line with national Green Belt policy.)
- Allocate sites for caravan parks (or expansions to existing caravan parks) and / or marinas?
- Other (please specify...)

Do you have any other comments on this topic?

Links

< Consultation / policies >

HC01i – GYPSIES AND TRAVELLERS & TRAVELLING SHOWPEOPLE

Why is a policy needed?

Providing sites for Gypsies, Travellers and Travelling Showpeople (referred to collectively as 'Travellers' in this policy area) is a controversial matter. Government policy requires local authorities to assess Travellers' needs, and to provide deliverable sites to meet these needs. The needs increase over time as Traveller children grow up and require a pitch / plot of their own. It is often the case that wherever a site is proposed, this is met with strong opposition from those in the surrounding area.

The majority of sites in West Lancashire currently occupied by Travellers are unauthorised. However, a lack of any suitable sites elsewhere means that it is not possible to take effective enforcement action. The sites are mostly long-established and owned by Travellers who have built connections with their local area (for example, through children attending schools). These 'connections' mean that alternative sites for these Travellers should be sought in the same area, rather than elsewhere in the Borough. Whilst there have been complaints and reports of incidents (anecdotally, these have often been perpetrated by temporary visitors to the sites), it is believed that most permanent occupants of the West Lancashire sites have generally behaved reasonably. However, most currently-occupied sites are unsuitable in policy terms in that they are in the Green Belt, and / or on land at risk of flooding.

The Council has tried hard to identify alternative, more suitable, sites for Travellers but has had very little success. Few, if any, landowners are willing to consider the use of their land as a Traveller site; some have expressed a willingness in the past but later changed their minds. In any case, the sites they own have tended to be in unsuitable locations. Council-owned land has been considered, but there appear to be no suitable sites in Council ownership. We have asked neighbouring authorities if they could help meet any of our Travellers' accommodation needs, but have received no positive responses.

[National planning policy](#) requires Local Plans to allocate enough deliverable sites to meet identified Traveller accommodation needs, and so a Local Plan policy is needed on this topic.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

A hybrid approach – allocate (i.e. authorise) some current sites, allocate land for future sites, and set aside parts of new site allocations for Travellers

Providing accommodation for Travellers in accordance with planning policy (meeting all needs, and in the right places) has proved to be an extremely difficult task over recent years, and there is no clear way forward in terms of policy at present.

It is likely that the preferred policy approach would be a combination of the first three options listed below, i.e.

- Allocate some of the sites where Travellers are currently residing
- Allocate suitable sites to meet the remainder of current needs, and seek to compulsorily purchase the land if that is considered necessary
- Set aside parts of new site allocations for Travellers in areas where there is a need for Traveller accommodation.

The advantage of this approach is that Traveller sites may be achieved through a variety of means, i.e. we are not 'putting all our eggs in one basket'. The disadvantage (and this is a difficulty for all the alternatives) is that it may not be possible to achieve even the individual elements of this policy, including compulsory purchase. Experience to date has shown it is very difficult to reach agreement on where Traveller sites should go. It is possible that even this approach may not meet all identified Traveller accommodation needs.

Alternative approaches

1. Allocate the sites which the Travellers in West Lancashire are currently occupying, or which Travellers own.

This means that there would be no need to move or 'evict' Travellers, and no need to find extra land for immediate needs. However, three of the current sites are in Flood Zone 3 where national policy does not permit caravans, so they could not be allocated. One other site is a temporary site not owned by its occupiers, for which there is no guarantee of long-term security.

2. Allocate sufficient suitable sites to meet identified Traveller needs in areas where Traveller needs exist.

Compulsorily purchase ('CPO') the land if necessary, i.e. if the landowners of chosen sites were opposed to their use for Travellers. However, there is no guarantee of success with this approach. It could possibly lead to a 'Catch 22' situation where the site could not be allocated unless the CPO were guaranteed to succeed (the site must be 'deliverable'), and the CPO could not be granted unless the site were allocated in a local plan.

3. Set aside part of new housing / employment site allocations as Traveller sites.

The thinking behind this approach is that the Council is doing landowners a favour by allocating their land for development. They in return should be willing to allow a small part of this allocation to be used for Traveller accommodation. Whether this would be the case 'in real life' is not guaranteed.

4. Leave the matter of Traveller site allocation to a future DPD.

This approach was allowed in the WLLP Examination [< Link to WLLP Inspector's Report >](#) in 2013, subject to a DPD being prepared speedily. However, the draft DPD was 'withdrawn' in 2016, to be addressed instead in the Local Plan Review, which was itself 'ceased' in 2019. A Local Plan Inspector would most likely be aware of this 'history' and it is improbable such an approach would be permitted again for this new Local Plan.

Your Views

The Council is required by law to meet Travellers' accommodation needs. How can we do this in West Lancashire?

Which policy approach should we take? (Please tick all that apply.) [< Allow for multiple 'ticks'. >](#)

- **Allocate the sites which the Travellers in West Lancashire are currently occupying, or which Travellers own.**
- **Allocate sufficient suitable sites to meet identified Traveller needs in areas where Traveller needs exist, using Compulsory Purchase powers if necessary.**
- **Set aside part of new housing / employment site allocations as Traveller sites.**
- **Other (please specify)**

Are there any policy approaches we should avoid taking? Please explain why.

Do you know of any sites (available or otherwise) that would be suitable as small Traveller sites? Please provide details. [<Link to a site submission page / allow for downloads of documents here.>](#)

Links

[< Planning Policy for Traveller Sites >](#)

[< Consultation / policies >](#)

HC01j – TEMPORARY AGRICULTURAL WORKERS

Why is a policy needed?

For many years, temporary (or seasonal) agricultural workers have been employed on farms in West Lancashire. Many of these workers have come from overseas, for example from EU countries. Following 'Brexit', it is unclear whether numbers will decline significantly, but it is considered there is a need for a policy to address the matter of accommodation for such workers, especially if numbers were to remain steady or increase again in the future.

It is likely that accommodation for agricultural workers will need to be in the Green Belt. The openness of the Green Belt should be preserved as much as possible – this can be done by reusing existing buildings, and by ensuring that other accommodation is only in place for a limited time.

A Local Plan policy would be useful to set out the Council's expectations for how suitable accommodation for temporary agricultural workers can be provided.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Continue with a similar policy to the present WLLP approach [< Link to WLLP policy RS5 >](#)

Allow for re-use of existing buildings (in settlements and in the countryside, including the Green Belt) to accommodate temporary agricultural workers, provided it complies with other policy.

Allow for non-permanent accommodation subject to certain criteria, e.g. there exists a need, there are no existing buildings that could be used, the site is the most suitable in the area, and the impact is minimised / mitigated.

The advantage of this approach is it would continue with a policy that appears to have been successfully used in West Lancashire over recent years, striking a good balance between providing adequate accommodation and safeguarding rural areas.

Alternative approaches

1. Have a more relaxed policy on this type of accommodation

Allow such accommodation in the countryside and Green Belt with minimal criteria to satisfy. This approach would make it easier for accommodation to be provided, but could lead to more harm to the countryside, especially if permanent buildings were to be permitted.

2. Have no policy

Have no policy at all on accommodation for temporary agricultural workers, but simply rely on national Green Belt / countryside policy in general.

This approach may make it more difficult to deal with planning applications for accommodation as there would be less detail in policy against which to assess them. This could lead either to harmful development being allowed, or no development being allowed, resulting in a shortage of accommodation for temporary agricultural workers.

Your Views

How should we ensure that temporary agricultural workers have places to live?

- Continue as present, allowing for non-permanent accommodation in the countryside or for buildings to be converted
- Have a more relaxed approach. (In what ways should we relax it?)

- Have a more stringent approach. (What form would this approach take, and why?)

Are there any sites in West Lancashire you consider would be suitable for temporary agricultural workers? Please provide details.

<Link to a site submission page / allow for downloads of documents here.>

Do you have any other comments on this topic?

Links

< WLLP policy RS5 > (or, if not possible, a link to WLLP [residential development policies](#))

< Consultation / policies >

HC02 – PLACE-MAKING

Why is a policy needed?

Town and country planning should ideally be about 'place-making', designing neighbourhoods and larger areas so that they work well, are good for people's physical and mental health and wellbeing, and relate well to the natural environment, climate change, and other matters. However, most development is already 'in place' and there are limited opportunities to design new neighbourhoods and settlements from scratch. Nevertheless, it is still worth having a policy that sets out principles for good place-making. These principles can be followed in all developments, with a view to improving areas overall through new development that takes place.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Have a set of principles for good 'place-making' that should be followed wherever possible, both for new ('greenfield' / large empty site) development, and also for smaller schemes within existing built-up areas or settlements.

The preferred policy approach would be built around the general principles of achieving good design, improving general health and wellbeing, and improving the natural environment. It would include the following principles:

- Make the health of residents / occupiers / visitors / neighbours a primary consideration, with the most sensitive uses located as far from possible from threats to health (e.g. busy roads)
- Design estates, neighbourhoods, and even settlements around people, not motor vehicles, and make them 'dementia-friendly' and 'older people friendly';
- Prioritise 'active travel' (in particular, walking and cycling) for example by footpaths / cycle path connections between neighbourhoods and facilities, giving a significant enough advantage over motor vehicles to encourage modal change for shorter journeys;
- Aim to achieve or contribute towards '20 minute neighbourhoods';
- Have as much 'nature' (green spaces, gardens, trees, water) within easy reach of everyone, to aid physical and mental health and biodiversity, and to mitigate / provide resilience to climate change.

This overarching, general policy would have links with several other policies in the Local Plan and elsewhere, including site allocations. It has strong links to general 'design' policies, with design likely to be a primary consideration in the new planning system proposed by the Government. This option was judged to be the most sustainable in the Sustainability Appraisal.

Alternative approaches

1. Have no policy.

Have no specific place-making policy but rely instead on national policy and relevant elements of other Local Plan policies (e.g. transport policy, or open space policy) and possibly also on a national design guide. Whilst there may be no 'harm' in simply relying on national policy, it is considered better and more beneficial to set out a locally-specific policy in the new Plan, to reflect particular characteristics of West Lancashire.

2. Site-specific development briefs

A similar alternative to the above would be to prepare site-specific development briefs for a number of larger local plan allocations but to have no other specific policy on place-making. Once again, whilst there may be no 'harm' in following such an approach, it is considered better to have a policy that applies across the whole Borough, rather than just to a limited number of new site allocations.

3. Have a stronger policy

Have a similar policy to the preferred approach above, but give it as much strength as is possible within the planning laws we have. For example, the policy could state that if one or more of its elements are not followed, development proposals would be recommended for refusal unless there were compelling reasons why a particular principle could not be followed.

The advantage of such an approach would be to push for good place-making at every opportunity. The disadvantage would be such a policy may not make it through the Local Plan examination, or may be challenged and overruled by other considerations.

Your Views

Which of the approaches do you think we should follow with respect to 'place-making'?

- a) Set of 'place-making' principles to follow
- b) No policy
- c) Policy applying only to a few limited sites
- d) A stronger policy

Feel free to give reasons for your choice(s)

Which place-making principles do you think are most important?

Is there anything we've missed in the policy? Please use the box below.

Or is there anything that should be taken out of the policy? Why should this be taken out?

Do you have any other comments on this topic?

Links

< Consultation / policies >

POLICY HC03 - HERITAGE

Why is a policy needed?

West Lancashire has a rich and varied history which is documented through the Borough's wide range of heritage assets. Individually and collectively these assets contribute to the enjoyment of life in the Borough and play a key role in shaping local character and identity. West Lancashire has 28 conservation areas, 12 scheduled ancient monuments and around 600 listed buildings. The historic environment makes a positive contribution to the Borough's local distinctiveness and helps define our sense of place.

New development should reflect and draw on the local character and distinctiveness. A Local Plan policy is needed to ensure that high quality design is achieved and that all new development respects the historic environment.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

A policy to preserve and enhance the Borough's Cultural and Heritage Assets

The continued preservation and enhancement of the West Lancashire historic environment is required by National Policy. A local heritage policy would aim to facilitate appropriate new development, and to make the most of opportunities to preserve and enhance the historic environment.

The policy would encourage high quality design and appropriate uses to ensure that poorly executed pastiche design solutions are avoided. Innovative and creative design solutions would be supported, provided they are sensitive and enhance the significance of heritage assets in terms of their architectural design, detailing, scale, massing and use of materials.

Alternative approaches

1. Do not have a heritage policy

This approach would mean we rely on the National Planning Policy Framework [< link >](#) to preserve the historic environment from inappropriate development. This may mean we allow more varied development that could affect the Borough's historic environment more than if there were a locally-specific policy.

The disadvantage of this approach is that it would not allow the Local Planning Authority to protect the area's historic environment to the extent the of having a specific heritage policy. This could result in incremental losses to the Borough's historic environment.

2. Have a very prescriptive policy

This approach would seek to significantly control the design of development affecting the Borough's heritage assets. This is not the preferred policy approach as an overly prescriptive approach could restrict innovative and creative design, contrary to the National Planning Policy Framework.

Your Views

What would you say are the main issues relating to West Lancashire's heritage?

What policy should we have on this subject?

- The policy outlined above
- No policy – rely instead on national policy
- A more prescriptive policy
- Something else (please specify)

Is there anything in our policy approaches that you particularly support or disagree with?

Do you have any other comments on this topic?

Links

< [Draft Heritage Conservation Strategy \(westlancs.gov.uk\)](http://westlancs.gov.uk) >

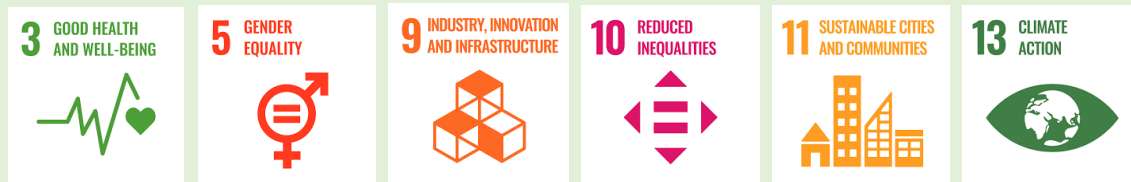
< <https://www.westlancs.gov.uk/media/98028/spd-design-guide-20081.pdf> >

HC04 - COMMUNITY FACILITIES

Why is a policy needed?

Community facilities, like shops, clinics, community centres, health centres and libraries, are essential to support strong, vibrant and healthy local communities with accessible services that reflect local people's needs. New developments can place pressure and demand on existing facilities and/or can lead to the loss of valued facilities and services. Ever-changing needs, demands and technologies will likely place further pressures on our community services.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

A flexible approach to maintain some control over community facilities.

This would enable a flexible approach to let the market and community decide what facilities should be delivered and where, but help control against the unnecessary loss of services. It would make sure new development is in the right locations, whilst resisting the loss of existing facilities. However, this approach would provide the Council with less control over the provision and location of community facilities, and it may also be harder to reduce inequalities across the Borough.

The Council's Sustainability Appraisal considers that, on balance, this option would be the most sustainable approach because of its flexibility to future changing demands.

Alternative approaches

1. Guide development in relation to specific development sites or infrastructure types

This alternative policy would set out in detail which community facilities should be provided or protected in different locations across the Borough. It would involve tighter controls over provision of new community facilities than the preferred policy approach, based on analysis of which services are under-provided for across the Borough, and could better help address inequalities across West Lancashire. However, tighter control would mean it would be more inflexible to changing needs and it may be more appropriate to let the market and community decide requirements.

2. Do nothing to control the provision or loss of community facilities

This approach would let the market and community decide what should be delivered and where. It would not provide any control over community facilities but would simply rely on national policy. This approach would not help reduce inequalities across the Borough.

Your Views

What would you say are the main issues relating to community facilities?

Which of the options do you most closely support?

- **A flexible policy**
- **A prescriptive policy**
- **No policy**
- **Another approach**

You may add comments if you wish

Is there anything in our policy approaches that you particularly support (or disagree with)?

Do you think this approach does enough to provide, or protect, community services? Why / why not?

Do you have any other comments on this topic?

Links

< Draft policy text >

< Evidence and background >

- < Sustainable Settlements Study >
- < Thematic Paper >

< Consultation / Policies home page >

POLICY EE01 - PROVIDING AND MANAGING EMPLOYMENT AREAS

Why is a policy needed?

The government says that we need to support economic growth and productivity; providing new land for employment uses of the right amount and type and in the right locations will allow us to plan to meet our future business needs and create jobs. If we don't provide enough new employment land, there is a risk that business needs will not be met which may cause existing businesses in West Lancashire to move to another area, no new businesses to move in and mean that West Lancashire residents would need to travel further afield to find work. Sites will be needed for a range of business needs, from start-ups to medium and large scale enterprises.

The Borough's settlements are surrounded by large areas of Green Belt, much of which is high quality agricultural land, so there is a tension between growing the local economy and protecting the natural environment and 'food security'. There is often also pressure to use existing employment areas for alternative uses such as housing and retail. Such a change may be suitable where an existing premise or use is no longer viable but needs careful consideration where premises and sites remain fit for purpose.

What UN Sustainable Development Goals does this policy contribute to?

8 DECENT WORK AND ECONOMIC GROWTH



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



11 SUSTAINABLE CITIES AND COMMUNITIES



Our preferred approach

Update and amend existing Local Plan Policy EC1

The existing policy identifies 3 types of existing employment site (Strategic Employment Sites, Other Significant Employment Sites and Other Existing Employment Areas) indicating the uses that would be allowed within them and the circumstances when their redevelopment would be allowed. In updating the policy, the number of existing employment areas that are protected for traditional employment uses (offices, research, light industry, general industry and storage and distribution) would be reduced. Within these 'core' employment areas permitted change of use from offices, light industry and research uses to other commercial activities, such as shops, would be restricted and general industry and storage and distribution uses would continue to be acceptable. Additional small-scale complementary uses would be permitted in these areas e.g. a cafe.

Outside the 'core' employment areas a wider range of commercial uses would be allowed in line with changes to the national Use Classes Order, meaning that offices, research and light industry would be permitted to change to shops, financial and professional services, food and drink, health centres, nurseries and gyms. Circumstances where these areas could be redeveloped for non-commercial uses e.g. housing would be set out.

Business sectors that it would be desirable for the Borough to diversify towards would be identified. The amount of new employment land in West Lancashire to meet needs would be included as part of a separate policy that deals with strategic employment land allocations.

The benefit of this approach would be to update an established policy as a result of changes to national planning advice and legislation and refine it from local experience. The Council's Sustainability Appraisal indicates that this approach would broadly represent the baseline position and would therefore have a neutral effect in terms of sustainability.

Alternative approaches

1. Update Local Plan Policy EC1: The Economy and Employment Land

The existing policy would be updated in a limited way to reflect the new amount of land needed for employment uses over the time period of the local plan as well as changes to the Use Classes Order which would mean that existing business (offices, light industry and research) uses would be permitted to change to other commercial uses, including shops, financial and professional services, food and drink, health centres, nurseries and gyms. This would recognise that a demand exists for these commercial uses, but they may not be able to afford rents to be able to locate in town centres. The benefit of this approach would be to update an established policy as a result of changes to national planning advice and legislation; the Council's Sustainability Appraisal indicates that this approach would have a neutral effect in terms of sustainability.

2. Zone areas for a wide range of economic activities

This policy approach would zone selected areas, within which there would be limited planning controls in order to encourage business growth akin to the former national Enterprise Zones. This would be the most radical of the options. The benefit of this approach would be to encourage more economic growth but there may be potential disadvantages in terms of environmental considerations as a result of less planning controls. Effects upon environmental considerations could not be precisely identified until the areas to be zoned for limited controls were identified.

Your Views

1. Which of the above approaches is your preference in relation to providing and managing employment areas? (please tick)

a. The Council's Preferred Approach - Update and amend existing Local Plan Policy EC1

b. Alternative Approach no.1 – Update Local Plan Policy EC1

c. Alternative Approach no.2 – Zone areas for a wide range of economic activities

d. Other (please explain and give more details)

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Should existing employment areas no longer be protected for predominantly employment uses (offices, light industry, research and development, general industry, warehousing and closely related employment uses) by allowing a wider range of uses?

Y / N

4. Do you think that new land should be allocated in West Lancashire to meet the employment needs of the Liverpool City Region such as strategic needs for logistics (distribution and warehousing) uses.

Y/ N

5. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Links

< Existing Local Plan Policy EC1: The Economy and Employment Land >

< Consultation and the policies 'homepages' >

National Planning Policy Framework, particularly Section 6 Building a strong, competitive economy:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

West Lancashire Housing and Economic Development Needs Assessment (HEDNA) (2017/2020)

Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) (2016)

West Lancashire Strategic Housing and Employment Land Availability Assessment

... all of which can be found here: <https://www.westlancs.gov.uk/planning/planning-policy/the-local-plan/the-local-plan-2038/evidence-base.aspx>

West Lancashire Economic Development Strategy 2015-25 which can be found here:

<https://www.westlancs.gov.uk/more/regeneration-projects.aspx>

POLICY EE02 - DEVELOPING THE RURAL AND VISITOR ECONOMY

Why is a policy needed?

Over 90% of West Lancashire is rural and there is significant rural employment comprising over half of the Borough's companies and 40% of jobs. It includes food production and associated distribution, visitor attractions and local services and community facilities such as shops. Development in rural areas needs to balance economic aspirations with environmental protection. The Borough has the best and most versatile agricultural land in the North West, much of which is Green Belt. Rural areas also contain sites of international and national nature importance. In the west, the Alt Crossens mosslands were drained to create high quality agricultural land.

Our rural areas will face pressures for settlement expansion, an agricultural sector in transition and the implications of Brexit, continued development of renewable energy and the availability, suitability and affordability of business premises. Rural business sites may be subject to various constraints, for example unsuitable roads or lower capability broadband. New and improved technology (such as high speed broadband) will create business opportunities and make rural locations more attractive.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Less restrictive than Adopted Local Plan Policy EC2: The Rural Economy

Although a little less restrictive than existing Local Plan policy this approach would still promote the protection of the countryside as a result of its Green Belt designation and agricultural land quality. It would seek to protect existing employment, agricultural, tourist and visitor uses in rural areas, subject to those uses remaining viable. A wider definition of employment uses would be used beyond those traditionally referred to (those being offices, industry and warehousing) to include all job-creating uses. There would be specific rural development site allocation(s). The expansion of existing rural businesses would be encouraged providing that they would be of a proportionate scale to their rural setting. The development of the best quality agricultural land would only be permitted where absolutely necessary.

Rural business diversification would be encouraged providing it would be of an appropriate scale. Live-work units would not be dealt with as part of this policy as they could be suitable in all parts of the Borough and not just rural areas. As such, they could be addressed separately.

The advantage of this approach is that it would be similar to the existing Local Plan policy but would allow for a wider variety of employment uses in rural areas which could result in more jobs and an improvement in the rural economy. This would need to be managed to reduce the potential for environmental impacts; nevertheless, this should be achievable and the sustainability appraisal indicates that it is the most sustainable of the options considered.

Alternative approaches

1. Existing Local Plan Policy EC2: The Rural Economy

There would need to be minor amendment to the existing Local Plan policy to reflect that the allocated Greaves Hall Avenue development site now has planning permission and is being developed. The policy seeks to protect the best quality agricultural land, protect existing rural employment sites and re-use existing buildings where they would be left vacant. It allows rural business growth (including agricultural produce, packing and distribution) in certain circumstances and promotes tourism of an appropriate scale. The policy has a wider definition of employment uses than just offices, industry, and warehousing. This approach has the advantage of simplicity in terms of continuing existing policy and supporting economic growth to some extent but is slightly less sustainable than the preferred approach.

2. Increased development in rural areas

Compared to the preferred approach this would entail the allocation of a greater quantity of land in rural areas for employment purposes. This may provide new opportunities for agricultural produce packing and distribution facilities and/ or for rural technology hubs. It would support visitor attractions and larger scale commercial uses, for example larger farm shops. This option has the advantage of promoting more economic growth in rural areas but the disadvantage of potential negative effects upon environmental consideration considered sustainable, but which could be reduced e.g. by allocating extra sites on non-sensitive brownfield land.

Your Views

1. Which of the above approaches is your preference in relation to developing the rural and visitor economy? (please tick)

a. The Council's Preferred Approach - Less restrictive than Adopted Local Plan Policy EC2

b. Alternative Approach no.1 – Existing Local Plan Policy EC2

c. Alternative Approach no.2 – Increased development in rural areas

d. Other (please explain and give more details)

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Should there be specific land allocation for employment uses in rural areas, for example for the provision of a central rural horticultural distribution centre or for offices of an appropriate scale?

Y / N

4. Should the provision of visitor and tourist facilities, including attractions and accommodation, be promoted in rural areas provided that the distinctive character of the West Lancashire countryside is protected?

Y / N

5. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Links

< Existing Local Plan Policy EC2: The Rural Economy >

< Consultation and the policies 'homepages' >

National Planning Policy Framework, including Sections 6 (Building a strong, competitive economy) and 13 (Protecting Green Belt land): <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

West Lancashire Economic Development Strategy 2015-25:
<https://www.westlancs.gov.uk/more/regeneration-projects.aspx>

POLICY EE03 - ADAPTING OUR TOWN AND LOCAL CENTRES

Why is a policy needed?

West Lancashire's town centres comprise Burscough, Ormskirk and Skelmersdale with a number of smaller local centres located within rural villages and suburban areas of Skelmersdale and Ormskirk. Our centres are facing increased challenges from the way that we shop and enjoy our leisure time, including the continued growth of online sales, competition from out of centre shopping and larger town centres in surrounding areas and economic challenges as a result of the Covid-19 pandemic.

We need to decide how our centres should develop in the future, including what uses should be allowed, whether more diversity of uses would be beneficial, where new development should take place to meet needs and how they can best serve local communities. Skelmersdale town centre needs improving and has potential development sites to enable this. Ormskirk is a more vibrant centre and has a well-established evening economy, but development sites are more limited. Burscough is the smallest of the Borough's town centres, is divided by the A59 and faces competition from Ringtail Retail Park to the south. Local centres also face increased pressure for changes from retail and service uses to non-commercial use, including residential, which may result in the partial or complete loss of commercial uses in a centre.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

One overarching policy for centres, with additional supporting policies for Burscough, Ormskirk and Skelmersdale town centre

An overarching policy would be supported by separate policies for Burscough, Ormskirk and Skelmersdale town centres, outlining a strategy for each centre. An additional separate healthy eating and drinking policy would deal specifically with the circumstances where takeaway and drinking establishment uses would be allowed in centres and in proximity to schools and colleges.

The overarching policy would include the centre hierarchy, establish local requirements for the sequential approach (the order of preference for locating new development, first preference being for town centres) and impact assessments with minor variations from the national norm, the approach towards deciding the uses that would be permitted in centres and the circumstances when new stand-alone local convenience stores would be permitted. There would be a focus upon Skelmersdale to support the regeneration of the town.

The current Local Plan requirement for a minimum of 70% retail uses within the primary shopping area of town centres would be removed as it is no longer relevant given changes to national legislation. Instead, proposals for new uses within centres would be considered in relation to their overall contribution towards commercial activity such as being open for at least part of the day and whether the use would be one typically found in a town centre etc.

This approach would have benefits in that it would update existing Local Plan policy to reflect changes in national legislation whilst providing greater detail by than currently exists by having an individual policy approach for each of the Borough's 3 town centres. The potential disadvantage would be conflict between the overarching policy and the individual approaches for each of the town centres; however, careful drafting of content should ensure that this would not arise.

Alternative approaches

1. Minimal changes to existing Local Plan Policy IF1: Maintaining Vibrant Town and Local Centres

This would be a single policy with no separate policies for Burscough, Ormskirk and Skelmersdale town centres and no supporting healthy eating policy. It would entail basic minimum amendments to existing Local Plan Policy IF1 in the form of the removal of the current requirement for a minimum of 70% retail uses within the primary shopping area of town centres due to changes to national legislation. The policy would deal with the centre hierarchy, the requirements for sequential and impact assessments and permitted uses in centres.

The advantage of minimal changes would be simplicity of approach; the disadvantage would be a potential lack of policy detail in relation to the specific circumstances of each town centre.

2. One single general policy in relation to centres and appropriate uses with no additional and separate policies for Burscough, Ormskirk, and Skelmersdale town centres

This would be similar to the preferred approach above except there would be no separate policies for Burscough, Ormskirk and Skelmersdale town centres and no separate healthy eating and drinking policy. Changes to the policy would be more than the basic minimum of alternative option 1 above.

The advantages and disadvantages of this approach would be similar to alternative approach no.1.

3. One overarching policy in relation to centres and appropriate uses with additional supporting policies for Burscough, Ormskirk and Skelmersdale town centre

Again, this would be similar to the preferred approach, including separate policies for Burscough, Ormskirk and Skelmersdale town centres but without a separate healthy eating and drinking policy, with these matters being covered in the overarching policy.

The advantages and disadvantages of this approach would be similar to the preferred approach with the inclusion of healthy eating and drinking policy considerations in the overarching town centre policy being more a matter of presentation as local plan policies need to be read as a whole.

Your Views

1. Which of the above approaches is your preference in relation to adapting our town and local centres? (please tick)

a. The Council's Preferred Approach - One overarching policy for centres, with additional supporting policies for Burscough, Ormskirk and Skelmersdale town centre. An additional separate healthy eating and drinking policy

b. Alternative Approach no.1 – Minimal changes to existing Local Plan Policy IF1

c. Alternative Approach no.2 – One single general policy in relation to centres and appropriate uses with no additional and separate policies for Burscough, Ormskirk, and Skelmersdale town centres

d. Alternative Approach no.3 - One overarching policy in relation to centres and appropriate uses, including healthy eating and drinking considerations, with additional supporting policies for Burscough, Ormskirk and Skelmersdale town centre.

e. Other (please explain and give more details)

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Are there any particular issues in relation to Burscough, Ormskirk and Skelmersdale town centres that need to be addressed by policy? (please describe the matter and relate it to a particular centre)

4. Should uses permitted West Lancashire's centres be widened to allow more non-retail activities provided that street frontages remain in active use?

Y / N

5. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Links

< Existing Local Plan Policy IF1: Maintaining Vibrant Town and Local Centres >

< Consultation and the policies 'homepages' >

West Lancashire Retail and Leisure Study (June 2018) which can be found here:

<https://www.westlancs.gov.uk/planning/planning-policy/the-local-plan/the-local-plan-2038/evidence-base.aspx>

Ormskirk Town Centre Strategy 2015-20 which can be found here:

<https://www.westlancs.gov.uk/more/regeneration-projects.aspx>

POLICY AREA EE04 - SKILLS AND EDUCATION

Why is a policy / policies needed?

The West Lancashire economy has performed well historically; however, there are differences across the Borough in terms of people's education, skills and qualifications and consequently in terms of income, and employment prospects. These are particularly noticeable between Skelmersdale and other areas of the Borough and means that some of our residents will miss out on economic benefits without positive actions to improve their life chances.

The Borough has an ageing population and therefore less economically active people as a result of retirements; however, this is happening at the same time as an increase in the demand for skills from employers so there may not be enough workers in the Borough to occupy jobs. Skill levels need raising to match employers needs and the Council can work with local businesses and education providers to help raise educational attainment and enhance training.

Edge Hill University and West Lancashire College are excellent educational establishments and Edge Hill is a major asset for our Borough in terms of its economic contribution and supply of highly skilled graduates. The University has enjoyed success and growth; however, its expansion has had other effects, in particular on Ormskirk, in terms of traffic and accommodation.

Local schools also have a key role to play in helping young people benefit from opportunities in the labour market. There are also advantages from lifelong learning which would allow residents to reskill during their working lives to meet changing business needs.

What UN Sustainable Development Goals does this policy contribute to?



Please note there are 2 preferred policy approaches below, A and B, each dealing with different aspects of this topic area.

Our preferred approach A: Edge Hill University Campus

A policy for the future development of Edge Hill University campus

The continued development and improvement of Edge Hill University campus and its facilities would be supported, including new purpose built student residential accommodation. The campus boundary would be shown on the Local Plan Policies Map. Any growth of the University beyond the existing campus would be either close by to the south of St Helens Road or within Ormskirk town centre. Travel plans and parking strategies would be required to encourage sustainable travel, improve access to the campus and alleviate existing or new traffic impacts.

Links between the University and local businesses would be encouraged in terms of information sharing and learning programmes and benefits to more deprived local communities would be sought.

A companion policy would address the issue of off-campus student accommodation in the form of Houses in Multiple Occupation (dealt with under the Housing topic).

The advantages of this approach would be to continue and update the approach taken by the existing Local Plan and the only disadvantage may be the campus expanding onto a greenfield site. The Sustainability Appraisal indicates this approach, along with alternative no.4, would be the most sustainable.

Alternative approaches A

1. To not have any policy for the University campus

Future development of the University would not be guided by a site specific policy meaning that development would be more likely to take place away from the existing campus. Whilst this would be a simple approach, the disadvantage would be that future development on campus may also be less able to be managed in terms of mix and quality.

2. A more detailed policy or masterplan for the University campus

This would tightly control what is developed on-campus and where. The disadvantage of this approach is that it may reduce the flexibility for the University to respond to changing demands within the higher education sector.

3. A different location for the expansion of the University campus

This approach would envisage the creation of a satellite campus elsewhere in Ormskirk or further afield in West Lancashire rather than expanding within or close to the existing campus. This is understood to not be the University's preference. It would have a mixture of positive benefits (potentially spreading economic benefits beyond Ormskirk) and disadvantages (accommodation pressures on Ormskirk as it would be less likely to provide the same amount of purpose built student accommodation and transport issues by creating additional movement of students between the main campus and satellite campus) as well as uncertainty around the location of any satellite campus.

4. A policy to deal with the future of Edge Hill University and selected other education sites

The policy could be expanded beyond the preferred approach to also include selected education facilities below higher education level (schools and colleges) and provide a broad policy framework for their future development. Whilst this would be a comprehensive approach it would be challenging both in terms of the scope of which education facilities to include or exclude and the flexibility a policy framework would require to deal with a range of different sites effectively.

Your Views approach A: Edge Hill University Campus

1. Which of the above approaches is your preference in relation to Edge Hill University Campus? (please tick)

- a. The Council's Preferred Approach – A policy for the future development of Edge Hill University campus
- b. Alternative Approach no.1 – To not have any policy for the University campus
- c. Alternative Approach no.2 – A more detailed policy or masterplan for the University campus
- d. Alternative Approach no.3 - A different location for the expansion of the University campus
- e. Alternative Approach no.4 - A policy to deal with the future of Edge Hill University and selected other education sites
- f. Other (please explain and give more details)

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Our preferred approach B: Skills and Training

A skills and training policy

The employment of local people and use of local businesses during the construction and implementation stages of major development proposals would be promoted. Planning applications for major development would be expected to produce an employment and skills plan identifying opportunities for the employment and up-skilling of local people during the implementation phase.

The advantage of this approach would be to increase the benefits from new development and potentially assist in reducing inequalities.

Alternative approach B

1. Not to have a skills and training policy

The advantage of this approach is simplicity by not placing additional requirements upon major development but the disadvantage would be to reduce opportunities for skills training.

Your Views approach B: Skills and Training

1. Which of the above approaches is your preference in relation to skills and training? (please tick)

- a. The Council's Preferred Approach – A skills and training policy
- b. Alternative Approach no.1 – Not to have a skills and training policy

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Links

< Existing Local Plan Policy EC4: Edge Hill University >

< Consultation and the policies 'homepages' >

West Lancashire Economic Development Strategy 2015-25, a copy of which can be found here:

<https://www.westlancs.gov.uk/business/business-advice-and-support/the-local-economy.aspx>

POLICY EH01 - NATURE

Why is a policy needed?

West Lancashire is predominantly rural, with an array of natural assets including green spaces, landscapes and land resources. The area is home to a number of protected habitats (some of international importance) and species. These will all benefit from a Local Plan policy based solely on the conservation and enhancing of nature and the Borough's biodiversity. We also need a local policy to set out how we implement the Government's expected new requirements on 'biodiversity net gain' and 'nature recovery strategies' in West Lancashire.

The protection of our natural assets will help ensure that West Lancashire retains its high-quality environment which provides amenity space for its residents and improves health and wellbeing, as well as helping species that move well beyond West Lancashire.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

The policy will continue the approach of the existing Local Plan Policy EN2: Preserving and Enhancing West Lancashire's Natural Environment, including parts 1 (Nature Conservation Site and Ecological Networks and 2 (Priority Species and Habitats) [<link>](#). This will include the requirement to secure a 10% increase in biodiversity as per the National Planning Policy and the soon-to-be published Environment Bill [<Link>](#)

This policy will seek to protect and safeguard all sites of international, national and local level importance. Where development is proposed within a Nature Conservation Area, this policy will seek to ensure that there is no harm to the area and that where development is considered to be necessary, mitigation measures are secured.

The biodiversity resources of the Plan Area and its surroundings will be conserved and where possible enhanced by ensuring that development proposals will not result in significant harm to biodiversity interests. The Ecological Networks which are currently in place within the borough, linking areas of West Lancashire to networks within neighbouring areas are likely to be replaced as the Lancashire Local Nature Partnership takes form. However as this has not yet been created, the policy will continue to protect the existing Ecological Networks. [<Link>](#)

With regard to Biodiversity Net Gain, the policy will be in line with the requirements to be stipulated within the Environment Bill when it is published towards the end of 2021. The requirement to secure at least a 10% biodiversity net gain for new development on site where possible, or on designated sites within the wider borough/county.

Alternative approaches

1. Require a 20% Net Gain requirement within policy for new development

The draft Environment Bill requires a national minimum net gain in biodiversity of 10% for new development, with the use of the DEFRA metric(s) [<Link>](#) to identify the level of existing biodiversity on the site. To produce a policy which requires a 20% goal, appropriate evidence to support this need

would be required. If sufficient evidence becomes available to support the requirement of 20% prior to the adoption of the Local Plan, the policy approach may change to reflect his.

The advantages of this policy approach would secure a greater level of net gains in terms of biodiversity for the borough, in turn improving the quality of the natural environment. Whilst it would be beneficial to secure a 20% net gain on developments, at the current time required evidence is not yet available and therefore a requirement for above the 10% minimum as stipulated by the draft Environment Bill is the preferred policy approach.

2. Creation of a specific Biodiversity Net Gain Policy

The creation of a specific Biodiversity Net Gain policy would result in a more prescriptive approach, which at this current time could hinder innovative design and development, as the Environment Bill has not yet been published.

There would be balanced advantages and disadvantages from this policy approach as whilst it would potentially provide guidance for developers regarding the provision of Biodiversity Net Gains, due to the lack of National Legislation in place it could potentially hinder innovative design and development, which is contrary to the National Planning Policy Framework.

Your Views

1. Which of the above approaches is your preference in relation to the Boroughs Nature? (please tick)

a. Continue the approach of the existing Local Plan Policy EN2: Preserving and Enhancing West Lancashire's Natural Environment, including parts 1 (Nature Conservation Site and Ecological Networks) and 2 (Priority Species and Habitats).

b. **Alternative 1** – Require a 20% Net Gain requirement within policy for new development

c. **Alternative 2** – Create a specific Biodiversity Net Gain Policy

What would you say are the main issues relating to nature in West Lancashire?

Is there anything in our policy approaches that you particularly support / disagree with?

Do you agree with following the national minimum requirement for 10% Biodiversity Net Gain or should we go for a higher figure?

Do you have any other comments on this topic?

Links

< [LERN - the Lancashire Environment Record Network - Lancashire County Council](#)>

< [Environment Bill - Parliamentary Bills - UK Parliament](#) >

< [The Biodiversity Metric 3.0 - JP039 \(naturalengland.org.uk\)](#) >

POLICY EH02 – PRESERVING AND ENHANCING THE BOROUGH'S LANDSCAPE / LAND RESOURCES

Why is a policy needed?

National guidance says that we need to recognise the character and beauty of the countryside. West Lancashire's predominantly rural landscape is a mixture of mosslands in the north, west and south, a coastal plain in the centre of the Borough, farmed ridges in the east, and flat, open coastal marshes on the Ribble Estuary. The Borough's settlements are set within this landscape and it is this local distinctiveness that makes West Lancashire an attractive location for visitors.

Much of the Borough's rural landscape is Green Belt which contains high quality soils, supporting the best and most versatile agricultural land in the North-West and amongst the best nationally. Our land also contains a variety of other natural resources which need to be used sustainably and may need to be preserved. It is also a resource to accommodate future development so a policy is required to balance these needs with being sympathetic to landscape character and environmental factors and help decide where development should take place.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Continue the approach of existing Local Plan Policy EN2: Preserving and Enhancing West Lancashire's Natural Environment, including Parts 4 (Land Resources), 5 (Coastal Zone) and 6 (Landscape Character) < Link >

This could be either part of a new stand-alone policy or incorporated within another policy. It would have a restrictive approach to new development taking place on the best quality agricultural land (grades 1, 2 and 3a) and would limit uses with the designated Coastal Zones shown on the Local Plan Policies Map < link > to the essential needs of coastal navigation, recreation, tourism and leisure, flood protection, fisheries, nature conservation and / or agriculture. It would require minor amendment to the existing policy to reflect the Marine Management Organisation's North West Marine Plan < link > and be clearer when referring to key landscape features e.g. geological features.

New development would be permitted (subject to compliance with other LP policies) where it is sensitively designed and makes a positive contribution to landscapes as defined by the Council's existing Natural Areas and Areas of Landscape History Importance Supplementary Planning Guidance [< link >](#) . This would reflect the existing policy approach so would be neutral in terms of sustainability and would have the advantage of continuing an existing policy which has been working satisfactorily.

Alternative approaches

1. Similar to option 1 (parts of existing Policy EN2)

This approach would be similar to the preferred policy approach but would remove the Coastal Zone designation from both the Local Plan Policies Map and the policy i.e. remove Part 5 of existing Local Plan Policy EN2. The advantage of this approach would be a simpler policy, with reliance upon the North West Marine Plan in relation to coastal areas; the disadvantage would be not clearly identifying coastal areas on the Local Plan Policies Map where there would be limitations on development permitted.

2. A less restrictive approach than existing Local Plan Policy EN2 Parts 4, 5 and 6

This approach would be more pro-development on sites which are of the best agricultural quality (grades 1, 2 and 3a). This could be done either on its own or in combination with the removal of the Coastal Zone designation from the policy (alternative option 1 above). There would be balanced advantages and disadvantages from such an approach (social and economic benefits from greater development compared to environmental considerations).

3. A more prescriptive approach than existing Local Plan Policy EN2 Parts 4, 5 and 6

The policy would require specific mitigation measures to help reduce the impact of a development proposal upon landscape history / character, and would require compensation measures where a development proposal would cause harm to the landscape character, but would also bring significant other benefits. There would be balanced advantages and disadvantages from such an approach (reduced social and economic benefits from less development compared to greater weight given to environmental considerations).

Your Views

1. Which of the above approaches is your preference in relation to preserving and enhancing the Borough's landscape and resources? (please tick)

a. Continue the approach of existing Local Plan Policy EN2 Parts 4 (Land Resources), 5 (Coastal Zone) and 6 (Landscape Character)

b. Alternative 1 – similar to option 1 (parts of existing Policy EN2) but would remove the Coastal Zone designation

c. Alternative 2 – A less restrictive approach than existing WLLP Policy EN2 Parts 4, 5 and 6

d. Alternative 3 – A more prescriptive approach than existing Local Plan Policy EN2 Parts 4, 5 and 6

e. Other (please explain and give more details)

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Should development on greenfield sites on the edge of and outside existing settlements only take place where the landscape and land resource are less sensitive to change?

Y / N

4. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Links

West Lancashire Natural Areas and Areas of Landscape History Importance SPG:

<https://www.westlancs.gov.uk/planning/planning-policy/supplementary-planning-guidance.aspx>

The North West Marine Plan: <https://www.gov.uk/government/collections/north-west-marine-plan>

The National Character Area Profiles for the North West of England (Natural England 2014):

<https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-north-west-england>

The Agricultural Land Classification Map for the North West:

<http://publications.naturalengland.org.uk/publication/144015?category=5954148537204736>

< Consultation and the policies 'homepages' >

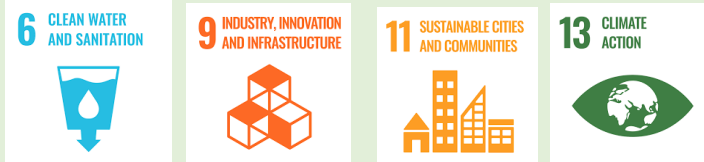
POLICY EH03 - FLOOD RISK AND WATER RESOURCES

Why is a policy needed?

Flooding can arise from a variety of sources: rivers and the sea, surface water, groundwater, sewers, canals or reservoirs. West Lancashire is a diverse area, including some coastline along the Ribble Estuary, extensive low lying mosslands in the west (the 'Alt Crossens area') and higher land in the east of the Borough, which means that flooding from all these sources is a risk.

Future flood risk is linked to global warming, with expected rising sea levels and more intense rainfall requiring management and mitigation. We need to direct new development towards areas of lowest flood risk, use green spaces to store surface water and slow down run-off, and have suitable flood defences. Tackling climate change by reducing greenhouse gas emissions, efficiently using our resources, reducing waste and developing renewable energy further would also help to address flood risk.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Update the existing Local Plan Policy GN3 part 3 (Reducing Flood Risk) to reflect advances in national guidance and practice and more recent local evidence on flood risk

The preferred approach would ensure that development does not result in unacceptable flood risk or drainage problems. No residential development site allocations would be proposed in areas at highest risk from flooding. Planning applications will need to be accompanied by a Flood Risk Assessment in all situations where a medium or higher flood risk from any source is identified, not only where the proposed development site is greater than 1 hectare in Flood Zone 1, an area the Environment Agency has identified with critical drainage problems (ACDP) or that the Local Authority has identified as a Critical Drainage Area.

Uses that are most vulnerable to flooding need to locate on the parts of a development site at lowest flood risk. The sequential test (locating development on sites at least risk from flooding from all sources) and the exception test (about a development providing wider sustainability benefits and being safe for its lifetime) will be required as set out by national advice, the latter using a local West Lancashire methodology. Developments will dispose of surface water in an order of priority with discharge to a public foul sewer not being permitted. They would also need to incorporate Sustainable Drainage Systems (for example green or blue features) as far as practical. Water quality (relating to water courses, water bodies and groundwater), water use and the protection of assets would also be addressed.

The benefit of this approach would be to follow national advice and to advance this to give a local West Lancashire perspective. The Council's Sustainability Appraisal indicates that this approach would have a range of positive effects and would be the most sustainable of all the approaches considered for this topic.

Alternative approaches

1. Existing Local Plan Policy GN3: Criteria for Sustainable Development, Part 3 (Reducing Flood Risk)

The policy ensures that development does not result in unacceptable flood risk or drainage problems by requiring it to:

- 1) be located away from Flood Zones 2 and 3 (areas at greater risk of coastal and river flooding);
- 2) where applicable, satisfy the sequential and exception test;
- 3) be supported by a Flood Risk Assessment (but in fewer circumstances than the preferred approach);
- 4) show that sustainable drainage systems have been explored and reduce surface water run-off.

The policy would be supported by a small number of residential development site allocations in areas at greater risk of coastal and river flooding e.g. in the Northern Parishes. The advantage of this approach would be setting a local framework for proposals to consider flood risk; the disadvantage would be that it is now a little out of date due to advancements in national advice and improvements to the Council's evidence base.

2. A new policy similar to the preferred policy approach above but less strict about when a Flood Risk Assessment would be required with a planning application

Content would be as per the preferred policy approach except that a Flood Risk Assessment would only be needed for planning applications on sites in Flood Zone 1 greater than 1 hectare or less the 1 hectare in an area the Environment Agency has identified with critical drainage problems (ACDPs) or that the Local Authority has identified as a Critical Drainage Area (CDA). This approach would have advantages in terms of placing less information requirements upon an applicant but the disadvantage would be to potentially overlook finer details regarding flood risk in relation to a development and how they may need to be addressed e.g. in terms of surface water or groundwater risk.

Your Views

1. Which of the above approaches is your preference in relation to flood risk and water resources? (please tick)

- a. The Council's Preferred Approach - Update existing Local Plan Policy GN3
- b. Alternative Approach no.1 – existing Local Plan Policy GN3
- c. Alternative Approach no.2 –less strict about when a Flood Risk Assessment is needed
- d. Other (please explain and give more details)

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Should all new residential development incorporate green features on site such as open spaces, ponds and trees, wherever practical, in order to store surface water on site and reduce surface water run-off.

Y / N

4. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Links

< Existing Local Plan Policy GN3: Criteria for Sustainable Development >

Level 1 and 2 Strategic Flood Risk Assessments: <https://www.westlancs.gov.uk/planning/planning-policy/the-local-plan/the-local-plan-2023-2040/evidence-base/strategic-flood-risk-assessment.aspx>

National Planning Policy Framework, Section 14 Meeting the challenge of climate change, flooding and coastal change: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

< Consultation and the policies 'homepages' >

EH04 – CONTAMINATION AND POLLUTION

Why is a policy needed?

In one sense, contamination and pollution are matters largely dealt with by legislation outside of Planning, and by other teams / bodies, e.g. Environmental Health or the Environment Agency. So the options for a local plan policy on pollution and contamination are therefore limited. However, Planning strongly interlinks with, and can influence, pollution and contamination. It can also help reduce people's exposure to pollution and contamination. These matters link strongly to health, which is one of the most important considerations in this Local Plan.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Broadly continue with current Local Plan policy. Proposals for development will need to minimise the risk from all types of pollution and contamination, and to seek to remediate and restore contaminated land.

Current policy is in the [West Lancashire Local Plan](#) policy GN3 parts 5(v) and 5(vii). The new policy (which may be a policy in its own right, or else part of a wider policy), would make a direct reference to health. It would go further than WLLP policy GN3 by resisting development that would result in neighbours, and / or future residents or occupiers of the development site being exposed to unacceptable levels of pollution or contamination. (The policy would need to carefully define what is meant by 'unacceptable'.) The policy would also cover light and noise pollution (including noise linked to businesses' operating hours).

Where development is proposed on a site that may be contaminated, the policy would require the developer to work out the nature, degree and extent of any contamination and other relevant ground conditions on the development site. This would be done by carrying out site investigations before starting work. (This requirement may also be covered by other policies / legislation.)

This approach enables planning to add 'extra value' to the pollution / contamination topic area, and supports the approach of considering health in as many Local Plan policies as possible. The Sustainability Appraisal concludes that this preferred approach is more sustainable than the alternatives.

Alternative approaches

Have no specific policy on pollution and contamination

This approach would rely on other legislation (e.g. on environmental health) to protect residents / occupiers / neighbours from exposure to pollution and contamination, and these matters would not be given specific mention in any Local Plan policy. The advantage of doing this would be to make the plan simpler, and to make life simpler for developers. The disadvantage would be to miss out on the 'extra value' from having a Local Plan policy, for example considering such matters as light pollution and people's overall health and wellbeing.

Take a more relaxed approach to pollution and contamination in order to prioritise brownfield land development

This approach would support the redevelopment of brownfield land by minimising the requirements for dealing with pollution and contamination, and the requirements for protecting residents / occupiers / neighbours from exposure to pollution and contamination. However, it would still need to comply with other relevant policy and legislation (including outside of Planning). For example, i.e. it would not allow exposure to illegally high levels of pollution and contamination, but it may have lower standards for mitigation / clean-up etc. compared to the preferred policy approach.

The advantage of this alternative would be to make redevelopment of brownfield land a little easier, which could in turn lead to less pressure to build on greenfield land. The main disadvantages would be the increased risk to human health and a probability of greater harm to the natural environment.

Your Views

Which of the three approaches do you think is the most appropriate, and why?

1. Use the preferred policy
2. Have no policy
3. A more relaxed approach

Free text for 'why'....?

Is there anything in our policy approaches that you particularly support or disagree with?

Do you have any other comments on this topic?

Links

< [National Planning Policy Framework](#) >

< Consultation / policies >

EH05 – AIR QUALITY

Why is a policy needed?

New development has the potential to affect air quality. Emissions from industry, from domestic properties, and from traffic, can pollute the air. Poor air quality affects not only the natural environment but also human health. Some aspects of air pollution are covered by Environmental Health laws, but Planning has the potential to influence air quality even more.

For example, planning policies can require measures to be put in place to minimise air pollution from new development. Effects on health can be controlled to an extent by keeping sources of pollution away from humans as far as possible. And new development can also help improve air quality, for example through appropriate planting and landscaping.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Have a policy that requires new development to minimise reductions in air quality and / or improve it where possible, and to locate sensitive uses away from sources of air pollution

This policy would continue the approach of the current West Lancashire Local Plan policy GN3.5(i) by requiring proposals for new development to be designed so that any lessening of air quality is kept to a minimum. The policy would also add a 'positive' requirement that new developments should look for opportunities to improve air quality, for example through planting and landscaping.

There would be cross-reference or overlap with other policies too, notably:

- a) Transport – seeking to reduce motor vehicle use and encourage active / green transport;
- b) Energy – supporting non-polluting ways of generating and using energy;
- c) Place-making – seeking to locate sensitive uses as far away as possible from sources of air pollution (for example avoid school and nursery playgrounds next to busy roads but close to green space / linear parks, etc.).

This policy approach would use planning powers to reduce potential harm to air quality, and to improve it where possible.

Alternative approach

Have no policy on air quality

The alternative is to have no specific policy on air quality but instead to rely on other policies. These may be policies on design in general, on transport, and on renewable energy, and also any Environmental Health requirements (separate from planning law). If air quality is covered by these alternative policies, then the only difference between this alternative and the preferred policy approach would be the lack of a requirement for new developments to seek to improve (rather than limit losses to) air quality. The advantage of this approach would be to have fewer policies in the Local Plan, possibly making it a little simpler. The disadvantages would be a lack of a co-ordinated 'central' approach to air quality, and the loss of the opportunity to achieve better air quality for some developments.

Your Views

Which policy approach do you think we should take?

- Have a policy
- Have no policy

Please explain why...

Can you think of any other ways we can improve or protect air quality through planning policy?

How important do you think it is to protect or improve air quality? (On a scale of 1-10)

Do you have any other comments on this topic?

Links

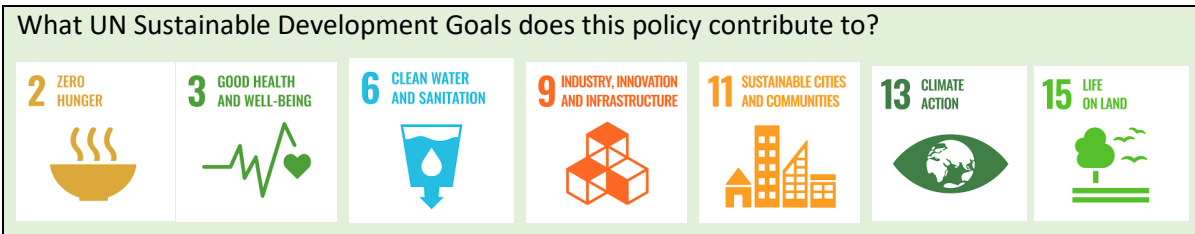
< Consultation / policies >

POLICY EH06 - GREEN INFRASTRUCTURE & OPEN SPACE

Why is a policy / policies needed?

Our natural and man-made environment provides places for active leisure, for example greenspaces and open space, as well as purpose-built leisure and community facilities. Green Infrastructure (GI) is the name given to the network of integrated green space and other green and blue features (water bodies) both urban and rural. It provides many benefits, for example enhancing quality of life and the environment, improving the image of a place, enabling exercise and improving health and well-being, cooling urban areas, reducing surface water run-off and providing habitats for nature.

Overall, there is good GI provision in West Lancashire, including large areas of Green Belt used for food production. However, publicly accessible open spaces are distributed less evenly and some areas don't have enough, with new development potentially creating a need for more. There are also ongoing pressures for the development of open spaces for more profitable commercial or residential uses. We need to make sure there are enough open spaces to meet informal use and formal sporting needs in the future and ensure the ongoing provision of active indoor leisure opportunities at sports centres, swimming pools, gyms and community facilities.



Please note there are 4 preferred policy approaches below, A, B, C and D, each dealing with different aspects of this topic area.

Our preferred approach A: Green Infrastructure

An overarching Green Infrastructure policy

An overarching Green Infrastructure (GI) policy would promote protecting and enhancing the GI network as well as promoting Active Design and the improvement of cycling and walking networks. The advantage of this approach would be to outline strategic matters and broad principles in order to set a framework for more detailed policies in relation to open space, trees and woodland.

Alternative approach A

1. Update Adopted Local Plan Policy EN3: Provision of Green Infrastructure and Open Recreation Space

The existing policy is split into two parts: 1) Green Infrastructure (GI) and 2) Open Space and Recreation Facilities. The first part sets out a strategic approach for how development would support providing a network of green spaces. The second part (open space) sets out the local circumstances when the loss of existing open space, sport and recreation facilities would be permitted, when new open space would expect to be provided by new development, and West Lancashire's key existing open spaces to be protected and improved.

To meet national advice and requirements, this policy would need to include amended criteria for when the development of open space would be permitted, as well as local standards for providing new open space in connection with new residential development, and costs for off-site open space provision. The advantage of this approach would be continuity with existing Local Plan policy, but the disadvantage would be a lengthy policy as a result of the additions needed to meet national advice.

Your Views approach A: Green Infrastructure

1. Which of the above approaches is your preference in relation to Green Infrastructure? (please tick)

- a. The Council's Preferred Approach – An overarching Green Infrastructure policy
- b. Alternative Approach no.1 – Update Adopted Local Plan Policy EN3
- c. Other (please explain and give more details)

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Should all new developments above a certain size be required to incorporate features that encourage an active lifestyle for local residents and visitors, such as walking and cycling between locations?

Y / N

4. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Our preferred approach B: Open Space

An Open Space, Sport, Leisure and Physical Activity policy

A policy covering both open spaces and built leisure facilities. It would contain criteria for considering when the loss of open space (including smaller greenspaces not shown on the Local Plan Policies Map) and built leisure facilities would be permitted and include local standards (based upon type of open space, quantity, quality and accessibility) for providing new open space in connection with new residential development. It would identify where key parts of the open space network would be protected and improved. Playing pitch requirements would be considered separately by reference to the West Lancashire Playing Pitch Strategy and Action Plan and, along with built development, Sport England guidance.

The advantage of this approach would be to consolidate open space and built leisure facilities considerations into a single policy. Separating these matters into two separate policies would be reasonable (alternative 2 below) and would largely be a matter of presentation.

Alternative approaches B

1. Update Adopted Local Plan Policy EN3: Provision of Green Infrastructure and Open Recreation Space

The approach would be as described above as the alternative to preferred approach A. This would result in a lengthy policy.

2. A separate built sports facilities policy

Preferred policy approach B would be separated into two policies, with one dealing with open space and the other with built sports facilities. This would largely be a matter of presentation compared to preferred approach B.

Your views approach B: Open Space

1. Which of the above approaches is your preference in relation to Open Space? (please tick)

- a. The Council's Preferred Approach – An Open Space, Sport, Leisure and Physical Activity policy**
- b. Alternative Approach no.1 – Update Adopted Local Plan Policy EN3**
- c. Alternative Approach no.2 – A separate built sports facilities policy**
- d. Other (please explain and give more details)**

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Should all new residential developments over a certain size be required to incorporate green infrastructure in the form of public open space using standards that are set locally?

Y /N

4. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Our preferred approach C: Open Space and Residential Development

An Open Space and Residential Development policy

This would be a companion to preferred policy approach B and would set out the circumstances when local open space standards would apply to new residential development proposals. The policy would contain an accompanying table of costs for open space provision and maintenance by different types of open space per sqm. for when a financial contribution for off-site open space would be needed when it could not be provided on site.

The advantage of this approach would be to clearly set out the open space requirements upon new residential development with associated costs in the Local Plan. Dealing with the circumstances when local open space standards would apply by a supplementary planning document would not be the most suitable approach because national advice indicates that the local plan should identify definite costs upon development

Alternative approach C

1. A policy similar to that above but also requiring open space to be provided in connection with selected commercial developments, such as offices, above a size threshold.

The advantage of this approach would be as preferred approach C above but the disadvantage would be additional challenges in adding standards and costs for open space required in relation to new commercial development where there is a lesser usage relationship to open space use compared to residential i.e. people's use of open space where they live. This would make such an approach difficult to evidence.

Your views approach C: Open Space and Residential Development

1. Which of the above approaches is your preference in relation to Open Space and Residential Development? (please tick)

a. The Council's Preferred Approach – An Open Space and Residential Development policy

b. Alternative Approach no.1 – also requiring open space to be provided in connection with selected commercial developments

c. Other (please explain and give more details)

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Should all new residential developments of any size that are unable to provide open space on site be required to provide a financial contribution towards new off-site open space or the improvement of existing public open space in that locality, as long as this is financially viable? Y / N

4. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Our preferred approach D: Trees, Woodland, Hedgerows

A Trees, Woodland, Hedgerows and Landscaping policy

This policy would seek to protect and enhance existing trees, woodlands and hedgerows and encourage the creation of additional tree cover. It would set out how woodland, trees and hedgerows should be considered in relation to new development proposals, the information to be accompanied with a planning application and when replacement trees and / or landscape planting would be required. There would be enhanced protection of any area of ancient woodland or of any ancient or veteran trees.

The advantage of this approach would be to update and refine the existing Local Plan policy.

Alternative approach

1. Part 3 of existing Adopted Local Plan Policy EN2: Preserving and Enhancing West Lancashire's Natural Environment

This approach would continue to deal with trees and landscaping as part of existing local plan Policy EN2. It would set out how woodland and trees should be considered in relation to new development proposals, the information to be accompanied with a planning application and when replacement trees and / or landscape planting would be required.

The advantage of this approach would be continuity with the existing Local Plan but the disadvantage would be not taking the opportunity to refine this policy.

Your views approach D: Trees, Woodland and Hedgerows

1. Which of the above approaches is your preference in relation to Trees, Woodland and Hedgerows? (please tick)

- a. The Council's Preferred Approach - A Trees, Woodland, Hedgerows and Landscaping policy**
- b. Alternative Approach no.1 – Part 3 of existing Adopted Local Plan Policy EN2**
- c. Other (please explain and give more details)**

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Links

< Existing Local Plan Policy EN3: Provision of Green Infrastructure and Open Recreation Space >

< Consultation and the policies 'homepages' >

National Planning Policy Framework, particularly Section 8 (Promoting healthy and safe communities):

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

West Lancashire Open Space Study incorporating Assessment Report (April 2018) and Standards and Strategy Paper (September 2018)

West Lancashire Playing Pitch Strategy incorporating Assessment Report (February 2018) and Strategy and Action Plan (September 2018) both of which can be found here:

<https://www.westlancs.gov.uk/planning/planning-policy/the-local-plan/the-local-plan-2038/evidence-base.aspx>

West Lancashire Built Facilities Assessment (January 2015):

<https://www.westlancs.gov.uk/about-the-council/spending-strategies-performance/strategies-and-plans/leisure-strategy-and-assessments.aspx>

Sport England's Active Design Guidance which can be found here:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

For Glossary

Green Infrastructure : A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity. It includes agriculture, parks, open spaces, playing fields, woodlands, street trees, allotments, private gardens, green roofs and walls and also includes rivers, streams, canals and other water bodies, sometimes called 'blue infrastructure'.

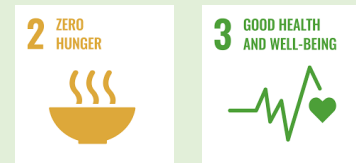
Greenspace refers to any vegetated land or water, either private or publicly accessible, within an urban area and is therefore a subset of Green Infrastructure (GI). Open space is a slightly different subset of GI as it includes publicly accessible land only and in the following typologies: parks and gardens, natural and semi-natural, greenspaces, green corridors, outdoor sports facilities, amenity greenspaces, provision for children and young people, allotments and cemeteries as well as civic spaces which are predominantly hard surfaced.

POLICY EH07 - HEALTHY EATING AND DRINKING

Why is a policy needed?

A policy in relation to healthy eating and drinking would be beneficial as, along with physical activity, it would offer opportunities for healthier lifestyles. Inactivity and high calorie food and drink are major contributors to increasing levels of obesity both for children and adults, for which the Borough is fairing worse than the national average. Adult obesity increases the risk of poor health and illnesses including diabetes and heart disease. Planning can affect food and drink choices by reducing access to less healthy food and drink establishments and increasing access to fresh, healthy and locally sourced food. It needs to be recognised, in this context, that in suitable numbers fast food outlets and drinking establishments can provide a local service, adding to the offer of town and local centres.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

A healthy eating and drinking policy which deals with hot food takeaways and drinking establishment uses supported by more detail in a Healthy Eating and Drinking Supplementary Planning Document

The preferred policy approach deals with drinking establishments and hot food takeaways (both Sui Generis uses) specifically. It would outline the circumstances whereby proposals for these uses would be supported and require all proposals for them to be accompanied by a Health Impact Assessment (HIA). The policy would set out where hot food takeaways and drinking establishments could be located, and in what amounts, both in town and local centres and in relation to schools and colleges. It would be supported by a Healthy Eating and Drinking Supplementary Planning Document providing further detail. The promotion of healthy eating through the development of allotments would be dealt with separately by Green Infrastructure and open space policies.

The advantage of this approach is it would introduce a new policy on healthy eating and drinking, compared to no current local policy and would encourage healthy lifestyles, and possibly also in terms of reducing health inequalities. It would also allow more detail in supplementary policy. The disadvantage would be to restrict the amount and location of fast-food outlets and drinking establishments which provide a local service and add to the range of uses, including in town and local centres.

Alternative approaches

1. No specific policy dealing with healthy eating and drinking

Such an approach would be on the basis of it being considered that there is no need to address these issues in West Lancashire. The Sustainability Appraisal indicates that this would be the least effective option and has the disadvantage of not linking with the Council's wider policies aimed at improving health.

2. No specific policy dealing with healthy eating and drinking as these issues will be dealt with by other policies in the Local Plan

This approach would mean that, for example, allotment provision could be addressed by Green Infrastructure and open space policies and the proportion of takeaways and public houses could be addressed by a town centre policy. Whilst possible, the disadvantages of this approach may be that the

promotion of healthy eating and drinking could be lost within other, more wide ranging policies and there would be reduced opportunity to address how the location of less healthy eating establishments relates to younger people in terms of proximity to schools and colleges.

3. Similar to option 3, no specific policy dealing with healthy eating and drinking as these issues can be dealt with by other policies in the Local Plan but produce a Supplementary Planning Document

This approach would be supported by the publication of a Healthy Eating and Drinking Supplementary Planning Document detailing what uses would be permitted in town, village and local centres and any restrictions on allowing fast food takeaways within easy walking distance of schools, as well as matters such as noise, odour and amenity. This would have advantages in providing detail in supplementary policy but the disadvantage of not giving health issues as much profile in the Local Plan as compared to the preferred approach.

Your Views

**1. Which of the above approaches is your preference in relation to healthy eating and drinking?
(please tick)**

- a. The Council's Preferred Approach - a healthy eating and drinking policy supported by more detail in a Healthy Eating and Drinking Supplementary Planning Document**
- b. Alternative Approach no.1 – no specific policy dealing with healthy eating and drinking**
- c. Alternative Approach no.2 – no specific policy dealing with healthy eating and drinking as these issues will be dealt with by other policies in the Local Plan**
- d. Alternative Approach no.3 – no specific policy dealing with healthy eating and drinking as these issues can be dealt with by other policies in the Local Plan but produce a Supplementary Planning Document**
- e. Other (please explain and give more details)**

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Should there be restrictions upon the number of takeaways and drinking establishments permitted in our town, village, local and neighbourhood centres?

Y / N

4. Should there be restrictions upon takeaways being permitted in proximity (e.g. within 400 metres, equivalent to a 5 minute walk) of primary and secondary schools?

Y / N

5. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Links

West Lancashire Health and Wellbeing Strategy 2018-2021:

<https://www.westlancs.gov.uk/about-the-council/spending-strategies-performance/strategies-and-plans.aspx>

National Planning Policy Framework e.g. section 8 Promoting healthy and safe communities:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

< Consultation and the policies 'homepages' >

TI01 – TRANSPORT NETWORKS

Why is a policy needed?

Land use planning has strong links to transport – people need to move between different places, and local plans can allocate sites for specific transport projects. There are a number of projects planned, or desired, in West Lancashire, for rail, bus, cycling, walking and roads. Changes are afoot nationally (for example, a revised Highway Code that gives greater priority to pedestrians and cyclists, and there are new ideas such as a '20 minute neighbourhood'. During the 2020 lockdown, many people had a taste of what life could be like with much more walking and cycling, and much less road traffic. It would be useful to refer to these different things in a new Local Plan policy.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

A policy that sets out specific transport schemes and supports the 20 minute neighbourhood concept.

The first part of the policy would carry on the current [West Lancashire Local Plan](#) ('WLLP') approach by setting out a list of proposed or desired transport improvement schemes across the Borough. These schemes would be supported and protected (i.e. we would not allow development that could prejudice their delivery). Some schemes would link with other Local Plan policies, e.g. the proposed Linear Parks in the Green Infrastructure policy. The policy would also require developers of new schemes to think about how they link to these transport networks, especially walking and cycling links.

The policy would also lend general support to the '20 minute neighbourhood' idea – designing places so that people can access as many services as possible within a 20 minute walk (see also the place-making policy [<link>](#)). It should also recognise changes to the Highway Code that give more priority to vulnerable road users. Together, these elements should enable people to walk and cycle more, rather than be dependent upon cars.

The benefits of this policy would firstly be a consistent approach with the current WLLP, recognising that some transport schemes take a long time to come to fruition. It would also seek to help make places more 'sustainable' and healthier, encouraging trips on foot and by bicycle, tying in with the Council's 'green' agenda and recognising the declaration of a climate emergency.

Alternative approaches

1. To only list schemes that we know will be delivered

This approach would omit schemes such as the Ormskirk Bypass and Skelmersdale rail link as there is currently no certainty that they will go ahead. Instead, the list would be confined to schemes which currently have funding. The policy could still refer to the 20-minute neighbourhood.

The disadvantage of this approach is that removing reference to schemes that are not certain to be delivered would undermine their chances of being delivered. Also, if the proposed routes of such schemes are not protected, then building on these routes could remove all possibility of their delivery.

For a scheme such as the proposed Skelmersdale rail link, which could bring significant benefits to West Lancashire and beyond, it is considered irresponsible to allow for the scheme to be stopped before even trying to bid for funding.

2. To not list any specific schemes

This approach would mean that the proposed or desired transport schemes would not be listed individually in a specific Plan policy, but would be replaced by a short 'catch-all statement' giving support for improved transport infrastructure, either in this policy (which would consequently be a lot shorter) or other policies - both strategic / general, and topic-specific, e.g. the Green Infrastructure policy. Presumably, this approach would also mean not marking proposed schemes on the Local Plan Policies Map.

The policy could still refer to the 20-minute neighbourhood, although as per the preferred policy option, it would also be covered in the place-making policy. As such, the most extreme version of this alternative policy approach would be for there to be no policy at all.

Once again, the disadvantage of this approach would be to undermine or prevent the delivery of certain schemes that could bring great benefits to West Lancashire.

Your Views

What approach should we take towards transport schemes?

- List all proposed and desired schemes
- List only the schemes we know will happen
- Don't list any schemes
- Other approach (please specify what)

Looking at the [list of schemes in the current Local Plan](#), are there any that should be removed in the new Plan? Are there any that should be added in the new Plan?

What are your views on a policy for '[20 minute neighbourhoods](#)' (link)? Should we promote these in the new Plan?

Do you have any other comments on this topic?

Links

< [West Lancashire Local Plan](#) >

< [List of WLLP transport schemes \(WLLP policy IF2\)](#) >

< ['20 minute neighbourhoods'](#) >

TI02 – PARKING STANDARDS AND ELECTRIC VEHICLE CHARGING POINTS

Why is a policy needed?

In relation to the climate emergency, the highest proportions of carbon emissions come from travel, and so a switch to cleaner, electric energy needs to be supported whilst also promoting sustainable and active travel (cycling, walking, public transport) to improve health and improve air quality. We know that car parking can provide benefits to an area, including attracting customers to town centre businesses. However, it can also contribute to congestion, hinder traffic movement, and be a potential danger for cyclists and pedestrians. In addition, the semi-rural nature of the Borough means that private vehicle use is often the preferred choice for many, and, as the Government intend to phase out the sale of petrol and diesel cars by 2030, we need to make sure that there is an available and expanding energy infrastructure to support electric vehicle usage.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Maintain the current policy which sets car parking standards, agreed between all Lancashire authorities, and sets the minimum number of electric vehicle charging points that should be provided on new residential and commercial developments.

This approach would continue to provide adequate levels of parking on new developments, whilst also helping to encourage the use of 'active travel' modes – like walking, cycling and public transport - and discourage private vehicle use. It may not go far enough to sufficiently discourage car use and promote 'sustainable travel' to improve health and respond to the climate emergency, but most likely strikes the appropriate balance given the Borough's semi-rural nature.

EVCPs would continue to be required for all new developments that require parking.

The Council's Sustainability Appraisal considered that this approach would have a neutral effect in terms of sustainability. Whilst other options would, in principle, appear to be more sustainable by reducing car parking so to force people to alternative modes of transport, this could lead to unwanted knock-on effects (see below).

Alternative approaches

1. Introduce a more restrictive policy to limit car parking spaces in new developments

National policy puts pedestrians and cyclists at the top of the road hierarchy. This approach would help prioritise walking, cycling and public transport over private vehicles, and help respond to the climate emergency. However, the borough is semi-rural and difficulties with accessibility of alternative modes of public transport would make this approach difficult and could cause negative knock-on effects like on street parking.

2. Introduce a policy that does not restrict car parking spaces

This approach would impose few or no restrictions on parking, but would subsequently likely increase vehicular traffic especially in town and village centres. It would fail to encourage the prioritisation of walking, cycling and public transport over private vehicles and would fail to respond to the climate emergency.

3. Don't require Electric Vehicle Charging Points

This approach would fail to ensure that appropriate numbers of EVCPs are provided on new developments. Given national Governments push to ban the sale of petrol and diesel cars by 2030, this would create added future costs for homeowners through retrofitting.

Your Views

Do you agree with our preferred approach to parking standards and Electric vehicle charging points?

Is there anything in our policy approach that you particularly support (or disagree with)?

Should we be doing more to encourage a move away from (petrol/diesel) private vehicle use?

- Yes
- No
- Other

Please explain your answer

Do you have any other comments on this topic?

Links

< Draft policy text >

< Evidence >

< Consultation and the policies 'homepages' >

TI03 – COMMUNICATIONS AND DIGITAL CONNECTIVITY

Why is a policy needed?

Communications and digital connectivity (e.g. 4G, 5G, broadband) are now essential parts of modern life. Those areas with poor connections, for example in rural areas, will find themselves at a social and economic disadvantage so it is important we improve access for everyone. In addition, technology is rapidly evolving and we must make sure we are adaptable to these changes. Digital connectivity also gives us opportunities to support smart technologies which enable the collection, analysis and sharing of data on things like water and energy consumption, that can help us become more sustainable and assist service planning.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

A flexible policy that governs communications and digital connectivity

A flexible approach would support the NPPF, which sets most guidance for communications development, whilst also enabling additional management of new infrastructure, for example promoting the sharing of existing facilities (masts, building, structures) and working to minimise / mitigate adverse impacts on the locality.

The Council's Sustainability Appraisal considers that this option would be the most sustainable approach owing to its flexibility.

Alternative approaches

1. Have no policy

This approach would place sole dependence on national planning policy (the NPPF) to guide new communications and digital connectivity, and so would reflect the approach of the current Local Plan. It means the Council would be unable to locally manage the siting and delivery of new communication developments, but would instead give maximum flexibility.

2. Introduce a policy that provides a high level of control, for example, by requiring new development to go beyond Part R1 of the Building Regulations 2010

This approach would provide greater control over the siting and delivery of telecommunication and broadband infrastructure but would be inflexible to evolving technologies and requirements and could make it harder to deliver new communications.

Your Views

Which option do you most closely support?

- Flexible policy
- No policy
- Restrictive policy

Please add any comments on your choice

Is there anything in our policy approaches that you particularly support (or disagree with)?

Do you have any other comments on this topic?

Links

< Draft policy text >

< Evidence >

< Consultation / Policies.>

TI04 – RENEWABLE AND LOW CARBON ENERGY GENERATION

Why is a policy needed?

Some of the largest carbon emissions are from energy. To reduce carbon emissions, we need to stop using fossil fuels (coal, oil etc) and move to cleaner, greener and renewable sources of energy such as wind and solar. Moving forward, renewable and low carbon energy is expected to be increasingly important to our economy, and so there are opportunities for the Borough to strengthen its 'green economy' as well as reducing emissions and improving air quality. Community energy schemes can help to reduce energy bills for local people and address fuel poverty within the Borough. Such local schemes also help reduce reliance on centralised suppliers, and imported power, aiding self-sufficiency. However, we also need to make sure that any opportunities for renewable energy are balanced with protecting important areas of the Borough – including landscape, heritage, agricultural land and important bird and bat species, migration routes and habitats.



Our preferred approach

Designate specific areas of opportunity for low carbon and renewable energy (LCRE)

National planning policy says that wind energy development may only be considered acceptable if it is in an area identified as suitable for wind energy development in the Local Plan (and, ultimately, is also backed by the local community). This approach would identify and designate the most appropriate areas of the Borough for wind development, as well as setting out its approach for solar and other energy schemes (based on an evidence base study), to enable to strategically plan for LCRE and comply with national planning policy requirements.

Such an approach would enable the support of LCRE developments subject to criteria on appropriate design, assessment of environmental / landscape / visual / land resource impacts, and community consultation. It would support national obligations to reduce fossil fuel consumption, and carbon emissions, to help tackle the climate emergency. To support a move to net zero, the policy also lends support for community-led LCRE schemes and would improve energy self-sufficiency.

The Council's Sustainability Appraisal considered that this option would be the most sustainable approach, by pro-actively designating the most appropriate areas of the Borough as suitable for renewable energy. However, it noted that it could be combined with alternative option 2 (below).

Alternative approaches

1. Do not allocate any areas for low carbon and renewable energy development, in order to enable a flexible response to schemes.

This approach supports an adaptable, flexible and broad approach towards LCRE, simply relying on criteria for siting / assessment of proposals. As it would not designate any specific areas of the Borough as being suitable or wind developments, this would not comply with national policy requirements and therefore it would be very difficult or impossible to deliver any wind schemes. It could lead to reactive, not strategic, planning and would fail to do enough to deliver renewable energy whilst also limiting green economic opportunities for the borough. It could also make it more difficult to ensure the protection of important areas, because of its 'reactive' nature. This approach would fail to help reduce greenhouse gas emissions and respond to the climate emergency.

2. Require all new developments to provide renewable energy – e.g. solar panels on commercial buildings and new dwellings or, on larger schemes, district heating networks.

This approach would require every new building to provide some of its energy via low carbon and renewable energy in line with national standards. Particularly in the early years of the plan period, as technologies develop, this may not be a financially viable option and could sterilise development. Such an approach may limit the types of renewable energy use to those listed in the policy and would not allow for other innovative / creative responses. However, it would help to respond to the climate emergency by increasing low carbon and renewable energy sources.

Your Views

Which option do you most closely support?

- Designate areas for LCRE
- No designations
- Require provision of LCRE in all new developments

Comments...

Is there anything in our policy approaches that you particularly support (or disagree with)?

Should we require all new developments to provide some low carbon or renewable energy through their design – for example, by requiring all new dwellings to have solar panels?

Do you agree we should designate areas for renewable energy, where evidence shows that it would be appropriate to do so?

Do you have any other comments on this topic?

Links

< Draft policy text >

< Evidence >

- <LCRE Study >

< Consultation / policies >

TI05 – ENERGY EFFICIENCIES IN NEW BUILDINGS

Why is a policy needed?

Evidence shows us that the energy use in homes accounts for 20% of UK greenhouse gas emissions (CCC 2019) and this needs to fall if we are to achieve the national 'zero net carbon' target by 2050. We need to make sure we are building homes that are energy efficient: that will use less energy for heating and result in cheaper energy costs for occupiers, and which are also designed to provide shade and ventilation in warmer periods to reduce overheating. Ensuring new builds are energy efficient also minimises the need for later retrofitting which will then come at a cost to the occupiers.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

To require *certain* new residential and commercial developments (e.g. those over a certain threshold) to deliver energy efficiency improvements above national standards.

This approach would likely require major residential and commercial developments to deliver energy efficiency improvements that go beyond national standards. In comparison, minor schemes would just be encouraged. This would ensure that some, but not all, new buildings are energy efficient on the basis that higher standards could render some developments unviable. However, it would be unlikely to deliver the energy efficiencies required to achieve net carbon and would increase costs for some homeowners against rising fuel costs and future needs to retrofit their properties.

To ensure such achievement, developers should be required to monitor energy efficiency improvements in their developments, to evaluate and improve performance to ultimately achieve zero net carbon goals.

The Council's Sustainability Appraisal considers that this option would be the most sustainable because the positive effects would be most marked of all the options assessed.

Alternative approaches

1. To require *all* new residential and commercial developments to deliver energy efficiency improvements above national standards.

This would ensure all new developments achieve energy efficiency improvements above national standards, which would help mitigate climate change. It would also help reduce property owner energy costs, and reduce the need to retrofit at a later date. This approach could also see the Council develop a solid reputation for 'leading' on the provision of energy efficient housing. However, it could affect development viability.

2. To require major developments only to deliver energy efficiency improvements above national standards.

This approach would be similar to the preferred approach above in that it would require major developments (only) to demonstrate how they have considered and are delivering energy efficiency improvements above national standards. Minor developments (e.g. small [<10] residential developments, and householder developments) would fall outside such requirements. As with the preferred option, it would be unlikely to deliver the energy efficiencies required to achieve net carbon and it would be unlikely that most minor developers would choose to voluntarily deliver energy efficiency improvements beyond building regulation requirements. This would increase costs for some homeowners given rising fuel costs and future needs to retrofit their properties.

3. Have no requirements for energy efficiency improvements in new buildings and allow developers to provide what they want in line with national standards.

This approach would not require developers to provide energy efficiency improvements; they would need only to be in accordance with national standards (building regulations) (i.e. outside the Local Plan). It would give the greatest flexibility, but would not help deliver the energy efficiencies required to achieve net carbon.

4. Do not require developers to monitor and evaluate performance.

There can be a performance gap between the energy improvements that may be programmed, and those that may actually be delivered once the development is completed. This approach would place no obligations on developers to monitor energy efficiency improvements and therefore the 'performance gap' would not be closed. However, it would save developers time and money.

Your Views

How important is it to you that new development is energy efficient?

Not.....Very

Should new development in the Borough meet or exceed national standards for energy efficiency?

- Meet
- Exceed

Please add any comments to explain your answer

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What policy approach should we have on this subject?

- Require certain developments to deliver energy efficiency improvements
- Require all developments to deliver energy efficiency improvements
- Require major developments to deliver energy efficiency improvements
- No requirements to delivering energy efficiency improvements

What should the policy approach be with regard to monitoring energy performance?

- Monitoring
- No monitoring

Comments....

Is there anything in our policy approaches that you particularly support (or disagree with)?

In principle, would you pay extra for a house that was zero carbon, on the basis that fuel bills would be a lot cheaper, you would be living in a 'green' house, and / or it would reduce the need to retrofit at a later date?

- Yes
- No
- Maybe
- Don't know

Comments...

Please rank the following priorities:

- Delivering energy efficiency homes
- Delivering affordable homes
- Providing a greater mix of house sizes
- Delivering infrastructure improvements
- Improving biodiversity

Comments...

Do you have any other comments on this topic?

Links

< Draft Policy text>

< Evidence >

< Consultation / Policies homepage >

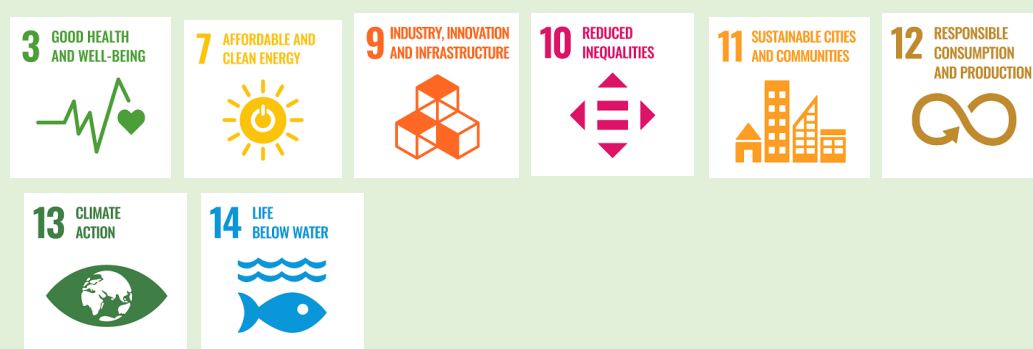
TI06 – WATER EFFICIENCY

Why is a policy needed?

Climate change will place increasing pressures on water supply. Reducing water consumption in new homes, even by modest amounts, can help secure future water supplies, protect the environment and reduce greenhouse gas emissions (resulting from the energy needed to treat, and heat, water), whilst also resulting in cheaper water bills for residents. In responding to the climate emergency, we need to ensure natural resources are used prudently and not wasted, and this includes water supply and demand.

Building Regulation standards already require all new homes to provide a water efficiency of 125 litres per person per day, but we can also decide to set 'optional' higher standards of 110 litres per person per day, which must be based on evidence.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

To introduce tighter, local restrictions, above that of the minimum Building Regulation standards, to improve water efficiency in new residential developments.

This approach would ensure that developments provide greater levels of water efficiency, than that currently required through Building Regulation standards. Better water efficiency means that new homes will use less water, and therefore help reduce stress on water supplies as well as reducing costs for water, energy and reducing carbon emissions. Effective water management also reduces the movement of water and sewage, thereby reducing energy requirements. It is not expected that the installation of water efficient fittings would have any impact on viability but this would be explored through future viability studies. It would be expected that relatively large efficiency gains could be achieved with minimal cost.

The Council's Sustainability Appraisal considered that this option would be the most sustainable because it would help greater protect natural resources and respond to the climate emergency, with little or no negative effects on any of the objectives.

Alternative approach

1. Do not have a policy; rely instead on Building Regulations to deliver water efficiency

This approach would mean that all new residential developments only provide water efficiency in accordance with Building Regulation requirements. This approach would not help better address the climate emergency and households would not benefit from any cost savings.

Your Views

Do you agree that we should require higher water efficiency standards (of 110 litres per person per day) in all new homes?

- Yes
- No
- Don't know

Comments...

Is there anything in our policy approach that you particularly support (or disagree with)?

Do you have any other comments on this topic?

Links

< Draft policy text >

< Evidence / Justification paper >

< Consultation / Policies homepage >

OT01 - SEQUENTIAL TESTS

Why is a policy needed?

The sequential test a requirement of national planning policy relating to town centre uses and flood risk and is a way of ensuring that new development takes place in sustainable locations. It is about guiding new town centre uses to town centres as a first priority, then edge of town centre sites and finally out of centre locations that are accessible. In relation to flood risk, it entails guiding new development towards sites at less risk of flooding from all sources (sea, rivers, surface water, groundwater, artificial sources). It is an applicant's responsibility to undertake and satisfy the test and having our own policy means that we can give more detail about how the Council expects a satisfactory sequential test to be done.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Amend the current policy to require a sequential test for town centre uses and proposals at risk from flooding in line with national policy but remove reference current local requirements upon affordable housing, employment uses and community Gypsy and Travellers and accommodation for temporary agricultural / horticultural workers.

The policy approach would set out the requirements for undertaking a sequential test, as set out by national advice only, comprising retail and other town centre uses on sites outside centres and proposals at risk from flooding. It would also set out what would be needed to undertake a satisfactory sequential test in terms of area of search, comprehensiveness or search, availability /viability / deliverability of sequentially preferable sites and site suitability.

The benefit of this approach would be to follow national advice but also set out exactly how the Council expects a satisfactory sequential test to be done locally and what information is expected from an applicant. The Council's Sustainability Appraisal indicates that all approaches considered would have the same neutral effect in terms of sustainability so this was not a deciding factor in selecting the preferred approach.

Alternative approaches

1. To not have a Local Plan sequential test policy and rely on national planning advice instead

This approach would mean that policies dealing with town centre uses and with flood risk would simply refer to the National Planning Policy Framework and National Planning Practice Guidance for how such a test would be undertaken by an applicant. The advantage of this would be the simplicity of referring to national advice but the disadvantage would be to not set out exactly how the Council expects a satisfactory sequential test to be done locally and what information is expected from an applicant.

2. Setting out the approach to undertaking a sequential test in separate town centre and flood risk policies

This would be the same as the preferred approach above except it would repeat the requirements for undertaking a sequential test, with minor technical differences, in separate town centre and flood risk policies. The advantage of this approach would be that slightly more detail could be given separately in relation to the differences in undertaking a town centre sequential test and a flood risk sequential test; the disadvantage would be it would result in a large degree of duplication.

3. Existing Local Plan Policy GN5: Sequential Tests

The approach would set out the requirements for undertaking a sequential test, as set out by national advice (town centre uses and flood risk) but also applying the test locally for some other uses, namely:

- Affordable housing, employment uses and community facilities on Protected Land;
- Affordable Housing or Gypsy and Traveller sites in the Green Belt; and
- Accommodation for temporary agricultural / horticultural workers.

It would also set out the requirements to undertake a satisfactory sequential test in terms of area of search, comprehensiveness or search, availability /viability / deliverability of sequentially preferable sites and site suitability. The advantage of this approach would be to assist in the sustainable location of these additional uses. The disadvantage would be additional information requirements being placed upon an applicant with probable minimal benefits in terms of sustainable development.

Your Views

1. Which of the above approaches is your preference in relation to sequential tests? (please tick)

a. The Council's Preferred Approach - Amend existing Local Plan Policy GN5

b. Alternative Approach no.1 – to not have a local plan sequential tests policy

c. Alternative Approach no.2 – a sequential test in separate town centre and flood risk policies

d. Alternative Approach no.3 – existing Local Plan Policy GN5: Sequential Tests

e. Other (please explain and give more details)

2. Is there anything in our preferred approach that you particularly support (or disagree with)?

3. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

Links

< Existing Local Plan Policy GN5: Sequential Tests >

[National Planning Policy Framework](#), Sections 7 (Ensuring the vitality of town centres) and 14 (Meeting the challenge of climate change, flooding and coastal change):

< Consultation and the policies 'homepages' >

OT02 – VIABILITY

Why is a policy needed?

Housing and other new development can provide or help provide 'knock-on' benefits such as improved open space, nature conservation features, transport links, regeneration, and certain other infrastructure. It may be argued that new development should always provide such 'benefits' in order to compensate for the effects of extra people and their day-to-day activities. Some of the benefits are non-negotiable – for example, 'biodiversity net gain' is expected to be required by law.

National planning policy gives a high priority to ensuring schemes are viable, and planning must not be seen to be preventing development and investment. This means the Local Plan is constrained in terms of what it can ask for, without making schemes unviable.

In one sense, it is too early to draw up a preferred viability approach at present. We need to carry out a full viability assessment of all draft proposed Local Plan. Knowing the relative costs of the requirements of other draft policies (e.g. affordable housing, nature improvements, energy and water efficiency) can help us work out which set of requirements the Plan should contain, and which we could not achieve.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

Set out a 'hierarchy of viability'

The (expected) preferred policy approach would be to set out a general 'hierarchy of viability', reflecting the Local Plan's overall priorities. This means 'ranking' the different things we would like as a consequence of new developments (in particular housing developments). In certain circumstances, the policy could allow for some variation area by area, or scheme-type by scheme-type.

The policy would also include more general wording on viability that could apply to developments other than housing.

In addition, the policy would also cover what the Council would expect an applicant to demonstrate when they propose a use that is not in line with Local Plan policy. This would be a similar policy to policy GN4 of the current [West Lancashire Local Plan](#) ('WLLP'). Policy GN4 requires the applicant to show either that continuing with the current use would not be viable, or that the land or premises is no longer suitable for the existing use, or that marketing shows no demand for the existing use.

The benefits of this policy approach are that it sets out clearly what the Council expects (or prefers) to be delivered alongside new housing (or other development), but allows for some flexibility. It also makes clear what the Council expects to be proved when someone proposes a use on a site that the Local Plan would not normally support. The Sustainability Appraisal concludes that the above policy approach is more sustainable than the alternatives listed below.

Alternative approaches

1. Have a very rigid policy

This policy would either be Borough-wide, or would set out different standards for different parts of the Borough. It would only allow the set 'hierarchy of viability' to be followed with no variation from it. In the second part of the policy, when proposing uses not in line with LP policy, applicants would have to meet much stricter criteria than those in the preferred policy approach (and also stricter than current WLLP policy GN4).

The advantage of this approach would be clarity for developers in knowing what is expected of them. The disadvantage is the lack of flexibility – we may only get the item at the top of the 'viability hierarchy' and nothing else. Also the stricter standards in the second part of the policy may stifle some development.

2. Have a more relaxed policy

This policy would essentially allow applicants to choose the desirable outcomes they want, scheme by scheme, with very few or even no criteria to be satisfied. In the second part of the policy, the criteria to be met (when proposing uses not in line with Local Plan policy) would be less strict than current WLLP policy GN4.

The advantage of this approach would be greater flexibility for developers, potentially helping encourage investment in West Lancashire. The disadvantages could be a lack of control by the Council in securing necessary benefits from new development, and in preventing losses of 'desired uses' (as it would be easier to change to other uses not supported by other Plan policies).

Your Views

What approach should the Local Plan take towards viability?

- Rank the things we want 'off the back' of new development, but allow for some flexibility
- Rank the things we want, and have no flexibility
- Do not rank the things we want – allow developers to choose
- A different approach (please describe below what this would be)

What things should the Council look to gain 'off the back' of new development (e.g. affordable housing, open space...)? Please list them in order of importance, starting with the most important

When someone want to change use to something not supported, or not encouraged by the Local Plan (e.g. to close a community facility and convert it to housing), how strict should our policy be?

- As strict as at present (West Lancashire Local Plan policy GN4) [<please provide link to this>](#)
- Less strict than as at present
- Stricter than as at present

If you wish to comment on this, please use the box below

Do you have any other comments on this topic?

Links

< West Lancashire Local Plan >

< WLLP policy GN4 >

< Policies / consultation >

OT03 – DEVELOPER CONTRIBUTIONS

Why is a policy needed?

All development, regardless of its size and scale, places additional demands on community services and facilities. Whilst some of the costs of providing new, or improved, infrastructure will be met by the public/third sectors, for example utility companies, some of it should be provided by developers. Developer contributions are an important tool in securing financial contributions, and typically fall as two types – the Community Infrastructure Levy and planning obligations (also known as Section 106s). Developer contributions can then be used by the Council to deliver improvements, whether across the Borough or specific to a local development site.

What UN Sustainable Development Goals does this policy contribute to?



Our preferred approach

To follow the current approach of requiring certain developments to provide a development contribution towards funding or delivering new infrastructure requirements.

This approach would set out how, where and when developer contributions would be expected. In line with national planning guidance, formulaic approaches to planning obligations may, ultimately, also be set within the policy. Developer contributions would then enable the Council to deliver new, or, improved infrastructure – including public open spaces, footpaths, cyclepaths and public realm. The charges set would need to be informed by evidence (viability studies). However, requiring developer contributions could make it harder to deliver things like affordable housing, biodiversity improvements or energy efficiency improvements in new buildings, because of the impacts all those multiple demands could place on financial viability.

The Council's Sustainability Appraisal considered that this option would, whilst representing the position in the current Local Plan (the baseline), be the most sustainable because it would require certain developments to provide a contribution to infrastructure, thereby helping to provide for the needs of communities.

Alternative approach

1. To not have a policy requiring developer contributions.

This approach would not require developers to make any financial contributions to funding community infrastructure. It would mean the full burden would fall on public/third parties, who may not have the monies available to be able to deliver any improvements, meaning that local needs may not be met. However, it could make it easier to deliver things like affordable housing, biodiversity improvements or energy efficiency improvements in new buildings, because it would be one less demand placed on development viability.

Your Views

Do you support the principle of developer contributions?

- Yes
- No

Comments...

What would you say are the main issues relating to developer contributions?

What approach do you most closely support?

- Current policy approach
- Have no policy
- Other (please provide details)

Is there anything in our policy approaches that you particularly support (or disagree with)?

Do you have any other comments on this topic?

Links

< Evidence >

< Consultation / policies home page >

WEST LANCASHIRE LOCAL PLAN 2023-2040

SUSTAINABILITY APPRAISAL 'REGULATION 18' ISSUES AND OPTIONS October 2021

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The Appendices to this Sustainability Appraisal Report are provided separately.

1. Introduction

1.1 Report Structure

1.1.1 This report forms the interim Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) for the Issues and Options stage of the West Lancashire Local Plan 2023-2040.

1.1.2 The Local Plan 2023-2040 will eventually supersede the current adopted West Lancashire Local Plan 2012-2027 as the adopted development plan for the Borough. The two main purposes of this interim SA / SEA are to help inform the preparation of the Local Plan, and to enable people to participate in the consultation on the Local Plan: Issues and Options, by providing an assessment of the strategic development options and policy options against the SA Framework set out in this document. This allows the Council and the public to identify the potential social, economic and environmental effects of the Local Plan 2023-2040.

1.1.3 This Sustainability Appraisal Report is structured as follows:

- Chapter 1 sets out the legal requirements for SA / SEA and summarises the SA process and how it relates to plan-making; it goes on to describe the Borough of West Lancashire from a sustainability point of view, outlines the reasons for, and nature of the Local Plan, and summarises work done to date on the SA Scoping Report and the establishment of an SA Framework for the Local Plan, including the 13 sustainability objectives and the 11 Topic (thematic) Areas.
- Chapter 2 considers the 10 overarching objectives of the draft Local Plan 2040, and how they relate to the 13 sustainability objectives against which the document is being appraised.
- Chapter 3 summarises the SA of the policy options.
- Chapter 4 explains how to comment on this SA, through the Local Plan consultation, and what the next stages are.

1.1.4 The full SA tables of the 40 different sets of policy options are provided separately in the Appendices to this document.

1.2 Requirement for Sustainability Appraisal / Strategic Environmental Assessment

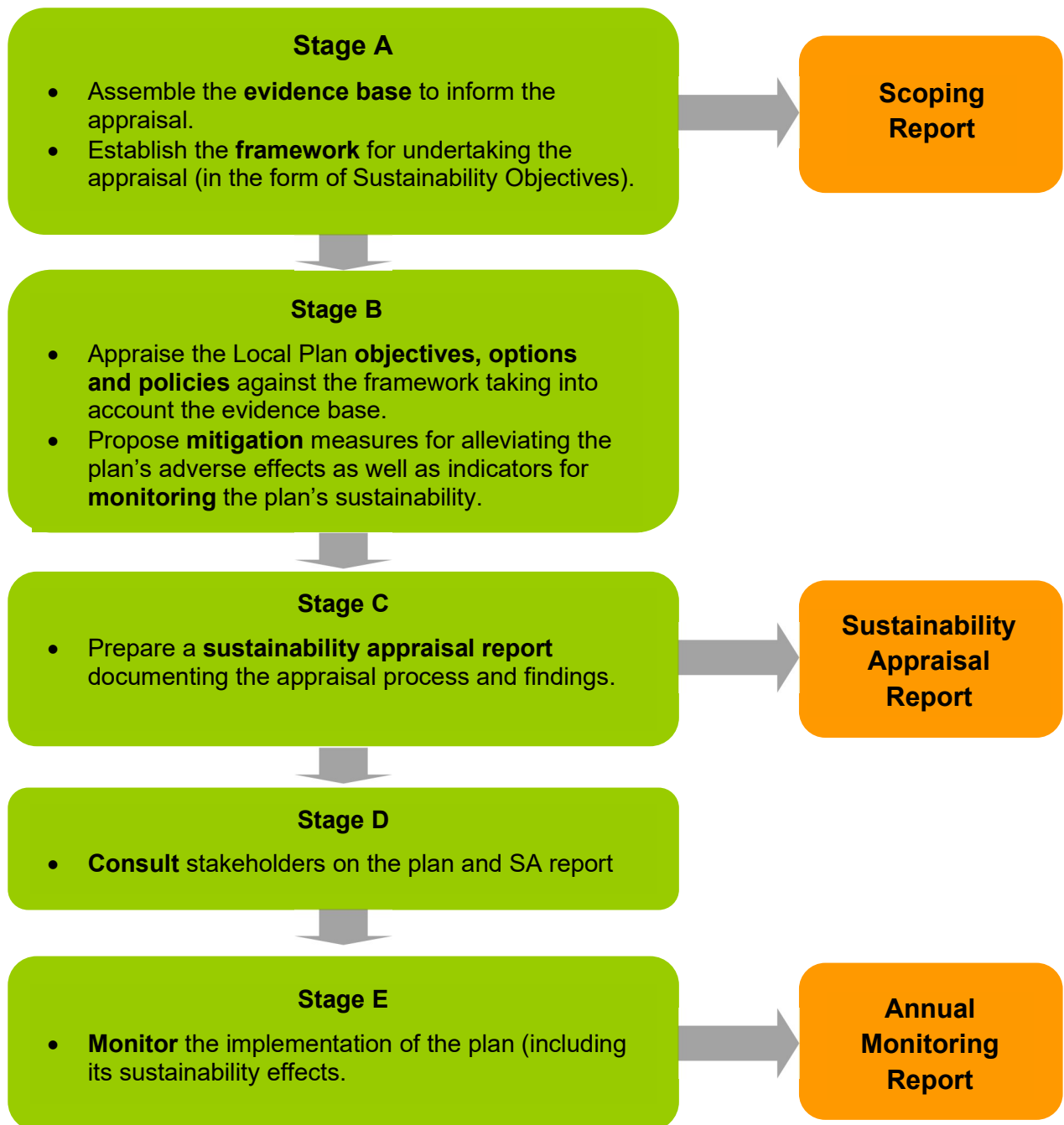
- 1.2.1 Under Section 39(2) of the Planning and Compulsory Purchase Act 2004, SA is mandatory for new or revised development plan documents.
- 1.2.2 Alongside this requirement, the Environmental Assessment of Plans and Programmes Regulations 2004 ('the 2004 Regulations') set a statutory requirement for local authorities to carry out an SEA of all planning and land use documents.
- 1.2.3 The 2004 Regulations transpose into UK law the requirements of the EU SEA Directive (Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment).
- 1.2.4 The government's preferred approach is to combine the requirement to prepare an SEA and an SA into one unified assessment process that considers economic, social, and environmental effects. National Planning Practice Guidance, published by the government, set out how local planning authorities should undertake SA of local plans¹.

The SA Process

- 1.2.5 The SA process essentially has five stages, as set out in Figure 1.1 overleaf

¹ <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

Figure 1.1: Five-stage approach to SA



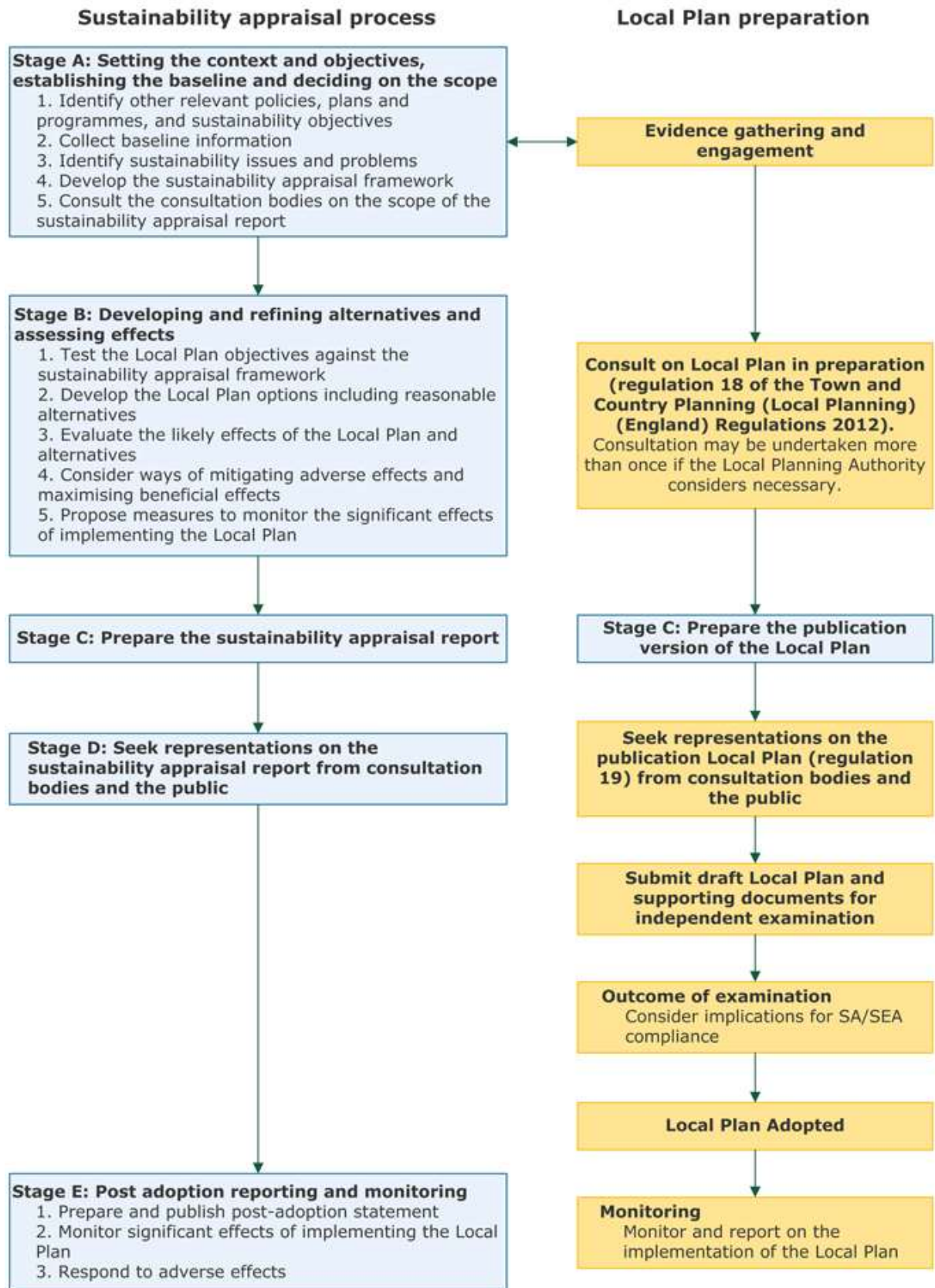
1.2.6 At the initial **Stage A** in the SA process, the framework for undertaking the appraisal of the emerging Local Plan is developed. Generally this requires the collation of an evidence base to provide an initial, or ‘baseline’ set of statistics (including trends), identification of issues arising from the baseline information, and the generation of a set of sustainability objectives to, among other things, address the issues. The SA framework and a summary of the evidence base are presented in the SA ‘Scoping Report’ which has undergone consultation with statutory consultees, namely Historic England, Natural England and the Environment Agency.

- 1.2.7 The SA Scoping Report for the West Lancashire Local Plan 2023-2040 was prepared in summer 2021 by Council Officers. The baseline data is contained in a set of Thematic Spatial Evidence Papers ('TSEPs'), produced separately from, but summarised in, the SA Scoping Report. These TSEPs are available on the Council's website².
- 1.2.8 Following consultation with the statutory consultees, and in the light of comments received, parts of the SA Scoping Report were amended. These amendments included minor changes to the proposed sustainability objectives and indicators.
- 1.2.9 **Stage B** in the SA process is the appraisal itself. This is an iterative process which requires the prediction and evaluation of the potential effects of the different strategic and policy-related options compared to the 'baseline' position. The possibility of mitigation measures and how they influence the likely effects of policies are also taken into account.
- 1.2.10 **Stage C** in the SA process involves documenting the appraisal and preparing the SA Report (this incorporates the material required for inclusion in the Environmental Report under the SEA Directive). Following public consultation (Stage D) the SA Report may require updating to reflect changes made to the emerging Local Plan in response to representations. Stage E concerns ongoing monitoring of significant effects.
- 1.2.11 Under the Town and Country Planning (Local Planning) (England) Regulations 2012, there is no specific requirement for the preparation of, or public consultation upon, either an "Issues and Options" or "Preferred Options" version of an emerging local plan document³. However, in order to give West Lancashire stakeholders the opportunity to participate as fully as possible in planning for their area, and to choose the best strategy for the future development of the Borough, it is proposed to publicly consult on the "Issues and Options" stage in preparing the Local Plan 2040.
- 1.2.12 This SA report of the Issues and Options version of the emerging Local Plan may be considered an "Interim SA Report" for the Local Plan. To ensure that the eventual strategy to be set out in the Local Plan for the future development of the Borough will be a sustainable form of development, and to provide a robust consideration of alternatives to the eventual proposals or policies chosen, a SA is being undertaken of the Local Plan Issues and Options documents.
- 1.2.13 Figure 1.2 below illustrates how the SA is an integral part of the local plan preparation process and should be undertaken in parallel with it.

² To see the TSEPs, follow links from <https://www.westlancs.gov.uk/planning/planning-policy/the-local-plan/the-local-plan-2023-2040/evidence-base.aspx>

³ Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 requires that consultation be undertaken on the scope of a local plan document, and Regulation 19 requires that the document be published for consultation before being submitted to the Secretary of State, but there is no specific mention of an "Options" or "Preferred Options" stage.

Figure 1.2 The SA process and Local Plan preparation



Source: National Planning Practice Guidance, DCLG 2014

Requirements of the SEA Directive

- 1.2.14 In preparing a new or revised Development Plan Document (DPD), West Lancashire Council must conduct an environmental assessment in accordance with the requirements of the European Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment ('the SEA Directive').
- 1.2.15 The SEA Directive requires that the following matters be considered in assessments:
- Biodiversity
 - Population
 - Human Health
 - Fauna
 - Flora
 - Soil
 - Water
 - Air
 - Climatic Factors
 - Material Assets
 - Cultural Heritage – including archaeological, architectural heritage
 - Landscape
- 1.2.16 There are two facets to the appraisal of a DPD: an appraisal of the DPD objectives (optional) and iterative appraisals of the DPD content – the options put forward during consultation, the preferred options chosen and, any additional options in the submission DPD. Consideration should also be given to mitigation and enhancement measures for alleviating adverse effects and maximising positive effects, as well as potential indicators for monitoring the plan's sustainability.
- 1.2.17 The SEA Directive and the 2004 Environmental Assessment Regulations require the public and the SEA Consultation Bodies to be given "an early and effective opportunity within appropriate time frames" to express their opinions on the draft local plan and the accompanying environmental report. When consulting on the emerging Local Plan, the local planning authority must also invite comments on the accompanying SA report.
- 1.2.18 Whilst this 'interim' SA does not meet all the requirements of an 'environmental report' (SEA Regulations), it provides helpful background information and context for the preparation of the SA Report which will be prepared alongside the Publication version of the Local Plan. Should there be any significant changes to the Publication version before it is submitted, a further SA Report will be required to accompany the Submission version of the Local Plan.
- 1.2.19 (Note that there is also expected to be another 'Regulation 18' consultation stage, currently planned for autumn 2022, looking at housing and employment land requirements and proposed site allocations. This stage will also involve SA.)

1.3 Characteristics of West Lancashire

- 1.3.1 This section provides a brief description of West Lancashire, in particular its sustainability (environmental, social and economic) characteristics. A fuller 'spatial portrait' of the Borough is available as part of the Local Plan: Issues and Options suite of documents.
- 1.3.2 West Lancashire Borough lies at the northern extremity of the Liverpool City Region and is adjacent to the Greater Manchester and Central Lancashire City Regions to the east and north respectively. The Borough has a population of approximately 114,000, and an area of 380km² (147 square miles).

Economic characteristics

- 1.3.3 West Lancashire benefits from its location close to the northern edge of the Liverpool urban area with good road and rail links into the city. There are also close links with Southport, Wigan and Preston. Much of the Borough has reasonable access to the motorway network, and there are rail links to Preston and Manchester.
- 1.3.4 Employment in the Borough is varied, including services, professional occupations, agriculture and horticulture, and, as with other areas, a declining manufacturing base. The Borough has a number of industrial estates, particularly in Skelmersdale and Burscough. Economic activity rates are healthy, and unemployment is generally lower than average.
- 1.3.5 Whilst Ormskirk functions as the administrative centre of the Borough, with its historic town centre and twice-weekly market, Skelmersdale (in planning terms) is the highest ranked town centre in the local settlement hierarchy. In 2019, work commenced on the regeneration of the Town Centre, including the delivery of new retail units in the town centre.
- 1.3.6 Edge Hill University, located on the edge of Ormskirk, has seen significant growth since 2000 and is a successful university and a significant contributor to the local economy. However, local graduate retention rates are lower than desired.

Environmental characteristics

- 1.3.7 In general terms, the west, south and north west of the Borough comprises flat, fertile land, mainly in intensive agricultural or horticultural use. In the east and north east of the Borough lies more undulating wooded and / or pastoral land. The northern boundary of West Lancashire comprises the Ribble Estuary, an internationally important nature conservation site, forming part of a route for many migrating birds in autumn and winter. To the west of Burscough lies Martin Mere, another internationally important wetland site (and also a tourist attraction). The northern 'finger' of Sefton Borough lies to the west of West Lancashire and contains several miles of coastline with more internationally and / or nationally important habitats, including sand dunes, dune heath, woodland, and the Alt Estuary.
- 1.3.8 A large part of West Lancashire contains safeguarded mineral deposits; in addition, there are extensive areas of deep peat, typically on the western edge and at the

south east of the Borough. Over 90% of West Lancashire is designated as Green Belt, thereby constraining development. The Borough contains a very high proportion of the North West's Grade 1 agricultural land.

- 1.3.9 Carbon dioxide emissions in West Lancashire are high in comparison to other Lancashire authorities and the rate for tonnes (of CO²) per person is above the national level. Emissions are greatest from transport, industry/land use, and domestic energy. Energy consumption is high, against ever-increasing (carbon based) energy costs, with the risk of many residents being in 'fuel poverty' and/or suffering further climate injustices (e.g. social heat vulnerability). With national targets to achieve net zero carbon emissions by 2050, action is needed at a local level to reduce the Borough's emissions, improve energy efficiency, and promote renewable energy with further opportunities to develop a green economy. As the climate changes, a range of species may shift northwards, and an ecological network of habitats and corridors, allowing the movement of species, will be increasingly important.

Social characteristics

- 1.3.10 West Lancashire is generally perceived as an attractive place to live, with several very affluent areas. As with other areas, house prices have risen significantly since 2000 and affordability of housing is a pressing issue. Crime rates for most types of crime are generally low and have decreased over recent years. The population is increasing slowly but steadily, and its composition is changing with the proportion of elderly people growing and projected to continue rising significantly, whilst the economically active population is projected to comprise an ever-decreasing proportion of the overall population.
- 1.3.11 Nationally, the Borough is ranked right in the middle in terms of the "Indices of Multiple Deprivation". However, this general ranking hides significant disparities between different parts of the Borough, with many parts of Skelmersdale experiencing below average educational attainment, employment prospects, health, income and housing quality. However, Skelmersdale has a number of advantages, including plenty of open space and greenery, and a congestion-free road system.

1.4 West Lancashire Local Plan 2040

- 1.4.1 The West Lancashire Local Plan 2012-2027 ('the WLLP'), adopted October 2013, has been reviewed (autumn 2019) and several of its policies found to need updating. The Council commenced work on a new Local Plan in autumn 2019. Work was then suspended in September 2020 because of the coronavirus pandemic and its impact on Council resources. In March 2021, the Council's Cabinet gave the go-ahead for work to recommence. The Local Plan 2040 will cover all topics relevant for inclusion in a local plan for West Lancashire Borough, and should be adopted in 2024, three years before the 'expiry' date of the existing WLLP, to ensure a Local Plan remains effective within the Borough
- 1.4.2 The NPPF advises that a typical local plan period should be at least 15 years, and that when the release of Green Belt is involved, sufficient Green Belt land be released (and safeguarded) to meet development needs beyond the plan period, in order to avoid the need to further amend the Green Belt at the next iteration of the local plan. The new Local Plan will run 2023 to 2040 (a 17-year period) and, through its preparation, will consider whether Green Belt release is required.

Preparing the Local Plan

- 1.4.3 Consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012, there are several stages involved in the preparation of the Local Plan:

- Development of the Evidence Base

The evidence base required for a local plan is extensive and splits into several topic areas. There are also over-arching themes which are often not specific to planning and cut across several topic areas, for example the themes of an ageing population, health, and the climate emergency. The evidence base is being prepared and updated on an ongoing basis, some work being carried out by Council officers, some by external consultants or other bodies with specific expertise.

- Scoping, Issues & Options stage (Regulation 18)

Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2020 essentially requires that, when preparing a new Local Plan, the Council must consult on the "subject" of a Local Plan that it is proposing to prepare and what it "ought to contain" (referred to as the 'scope'). The Regulation 18 consultation will identify the key issues the Council believes the Local Plan needs to address, options for how planning policies might address those issues, and an indication of the Council's preferred option for the approach planning policies in the Local Plan might take to deal with each of those issues (based on the best available evidence and best practice at that time).

- Development requirements and site allocations (Regulation 18)

Following consultation on the Issues and Options, a separate, and additional, public consultation will be undertaken on the proposed development requirements for the Borough for the Plan period, and the proposed site allocations necessary to meet those development requirements. Essentially, this will, based on evidence, propose the amount of development required for the Plan period and where it will be located within the Borough. This consultation will be an additional consultation under

Regulation 18, to enable specific engagement on the Council's consideration of development needs and site allocations before it finalises the Local Plan document it wants to publish before submitting for Examination.

- Publication (Regulation 19) and Submission (Regulation 22)

Following consideration of representations received at the initial Regulation 18 consultation, and the additional consultation on development requirements and site allocations, the Council will prepare the new Local Plan document. This will include a series of planning policies, site allocations and a policies map. This version of the Local Plan is known as the 'Pre-Submission', 'Publication', or 'final draft'. The 'Pre-Submission' document is then published (the Publication stage) to give stakeholders a final chance to make formal representations on its content. These representations are then submitted (the Submission stage), alongside the Local Plan and necessary accompanying documentation, to the Secretary of State for examination.

- Examination (Regulation 24) and Adoption (Regulation 26)

Once the Local Plan is submitted, it is then in the hands of the Planning Inspectorate to appoint an independent Inspector to undertake an examination in public of the document. Following the examination hearing sessions, and consideration of all the evidence and representations submitted, the Inspector will write a report concluding whether or not the Local Plan is sound, and outlining any changes (modifications) that are necessary to make the plan sound. It may be necessary to carry out a public consultation exercise on proposed modifications to the Local Plan document, in particular if the modifications materially change policies of the document.

Once found sound, the Local Plan can be adopted by the Council.

- 1.4.4 The planned timetable for the preparation of the West Lancashire Local Plan is set out in the Council's Local Development Scheme, available online by following links from <https://www.westlancs.gov.uk/planning/planning-policy.aspx>.

Structure of the Local Plan Issues and Options Documents (anything else needed?)

1.4.5 The Issues and Options document (actually a suite of documents in order to improve public accessibility) comprises the following elements:

- **Portrait of West Lancashire** – a description of the Borough and its constituent settlements and areas.
- **Vision** – a description of how we would like West Lancashire to be by 2040
- **Objectives and Indicators** – what the plan aims to achieve, and how we will measure performance against those aims
- **Strategic Policy Options** – for policies focused on overarching strategy, including sustainable development, settlement boundaries and climate change and environmental sustainability. (This section of the Plan will also include housing and employment land requirements, distribution of development around the Borough, and any strategic development sites, but these items are not known or decided at this stage of preparing the Plan.)
- **Housing and Communities Policy Options** - for policies including housing needs, place-making, heritage and community facilities.
- **Economy and Employment Policy Options** - for policies including employment sites, the rural economy, town and village centres and education and skills.
- **Environment and Health Policy Options** - for policies including the natural environment, nature conservation sites, and the built environment.
- **Transport and Infrastructure Policy Options** – for policies including transport networks, car parking standards, electric vehicle charging, digital connectivity, low carbon and renewable energy, energy efficiency and water efficiency.
- **Other Policy Options** – for policies on sequential tests, viability and developer contributions.

1.5 The Local Plan SA Scoping Report

1.5.1 During Spring 2021, an SA Scoping Report was prepared and consulted upon with statutory consultees. This report covered 11 ‘thematic topic areas’, addressing different aspects of ‘sustainability’. For each topic area, the Scoping Report considered:

- Relevant plans and strategies (international / national / regional / sub-regional / local levels) – their main points of relevance, and how they relate to, or may influence, the Local Plan. Some plans and strategies (for example, the National Planning Policy Framework) cover more than one topic.
- The local context in terms of the topic in question – effectively a brief summary of the latest evidence on that particular topic. The evidence base is itself set out and / or summarised in two sets of topic papers, one set covering specific themes, for example transport, and one set covering the different geographical areas of West Lancashire. These thematic and spatial evidence papers ('TSEP') are available on the Council's website.
- What the likely situation would be without the implementation of new Local Plan policies or proposals. This analysis, along with the local context, forms part of the ‘baseline position’ for the Borough.
- Sustainability-related issues in West Lancashire relating to the topic in question, in the light of what is set out in the evidence base. These issues have been used to determine a set of sustainability objectives (whose purpose is to address the issues), each including locally distinctive sub-criteria.
- The sustainability objectives, their sub-criteria, and a series of corresponding proposed indicators, together form the proposed SA framework for the Local Plan 2040.

1.5.2 This Scoping Report effectively fulfils Stage A of the SA process (Fig.1.2), as follows:

A1: Identifying other relevant policies, plans and programmes, and sustainability objectives.	These are identified on a topic-by-topic basis through the Report.
A2: Collecting baseline information.	This baseline information is drawn primarily from a series of topic and place-based evidence papers prepared by the Council.
A3: Identifying sustainability issues and problems.	The issues arise from consideration of the evidence papers, and are set out in detail, as well as summarised in the Scoping Report.

A4: Developing the SA framework.	The Scoping Report sets out objectives arising from, and seeking to address, the identified issues; it also suggests indicators for each objective – this is effectively the SA framework.
A5: Consulting the consultation bodies on the scope of the SA.	The views of statutory consultees were sought in a 5-week consultation in spring 2021.

1.5.3 The Scoping Report was consulted upon in April/May 2021. Comments were received from Natural England, Historic England and the Environment Agency. Lancashire County Council's Public Health Team were invited to comment but were unable to do so due to their resources, understandably, still being focused on the Covid-19 pandemic. This consultation resulted in a number of minor amendments being made to the Scoping Report, which are detailed in an accompanying feedback report. The Scoping Report and the Thematic Spatial Evidence Papers ('topic papers') are available on the Council's website at:

<https://www.westlancs.gov.uk/lp2040>

1.6 The Local Plan 2040 Sustainability Appraisal Framework

- 1.6.1 The table on the following pages sets out the proposed framework upon which the Sustainability Appraisal of the Local Plan will be based – the 13 broad objectives, locally-distinctive sub-criteria, and indicators. The sub-criteria provide more detail as to how the SA Objectives might be achieved, and how a particular policy may be assessed against the objectives.
- 1.6.2 The indicators are drawn from various sources, most notably the authority’s Annual Monitoring Report. In choosing the indicators, consideration has been given to whether the data is readily available (at West Lancashire level, and updated sufficiently regularly), what the data demonstrates, and how well this relates to the objective in question.
- 1.6.3 Consultation on the SA Scoping Report led to minor tweaks to the wording of some objectives, to their sub-criteria, and to their proposed indicators. Full details of changes to the report are available on the Council’s website:

<https://www.westlancs.gov.uk/lp2040>

Table 1 Sustainability Appraisal Framework for the Local Plan 2040 – Objectives, Sub-Criteria, and Indicators

Objective	Locally distinctive sub-criteria	Indicators
1. To cater for the needs of an ageing population.	<ul style="list-style-type: none"> • Will the plan / policy facilitate the provision of accommodation suitable for (designed or adaptable for) the elderly? • Will the plan / policy facilitate the provision of infrastructure / services for the elderly? • Will the plan / policy make it easier for the elderly to find appropriate employment or activities in which to participate? 	<ul style="list-style-type: none"> • Number / percentage of residential developments (>15 units) requiring specialist accommodation for the elderly; • No. of specialist housing units for the elderly completed; • No. of Class C2 dwellings completed / granted permission.
2. To reduce Borough-wide inequalities with regard to learning, skills, educational attainment, and employability.	<ul style="list-style-type: none"> • Will the plan / policy increase the levels of participation and attainment in education? • Will the plan / policy address skills gaps and enable skills progression? • Will the plan / policy help develop the Borough's knowledge base? • Will the plan / policy improve people's chances of success in applying for jobs? 	<ul style="list-style-type: none"> • GCSE attainment amongst WL pupils; • % of the population educated to degree level or higher; • % of the population with no qualifications / Levels 1-4; • % of Job Seekers Allowance Claimants.
3. To improve health and well-being and reduce inequalities	<ul style="list-style-type: none"> • Will the plan / policy improve economic, environmental and social conditions (quality of life) in deprived areas and for deprived groups? • Will the plan / policy reduce isolation in the community? • Will the plan / policy reduce levels of crime and / or the fear of crime? • Will the plan / policy reduce health inequalities? • Will the plan / policy provide opportunities to protect or enhance areas of public open and recreational space, and Green Infrastructure, so to support opportunities for physical and mental health improvement? • Will the plan / policy facilitate or encourage healthier lifestyles? Will the plan / policy improve the quantity and quality of, and access to, areas of open and recreational space, and to Green Infrastructure in general? • Will the plan / policy increase opportunities for active travel (cycling/walking)? 	<ul style="list-style-type: none"> • Loss of any publicly accessible green / open space; • Serious acquisitive crime rates; • Mortality rates (male and female); • Life expectancy at birth / at age 65; • % of the population whose health is considered 'good'; • % of the population with limiting long term illness; • No. people attending health, wellbeing and sports activities and courses (gym & weight referrals, health walk attendance) • Percentage of physically inactive adults • Percentage of Year 6 children classified as overweight or obese • Length of new cycleways and other 'greenways' (Linear Parks, etc.) provided / improved.

Objective	Locally distinctive sub-criteria	Indicators
<p>4. To reduce economic inactivity and disparities in employment.</p>	<ul style="list-style-type: none"> • Will the plan / policy provide job opportunities in all areas, including most needy areas? • Will the plan / policy encourage business start-ups, especially from under-represented groups? • Will the plan / policy provide a broad range of jobs and employment opportunities? • Will the plan / policy provide higher skilled jobs? • Will the plan / policy improve accessibility to jobs via the location of employment sites? 	<ul style="list-style-type: none"> • % of people employed; • % of population living in workless households; • Average incomes and earnings; • % of the working age population economically active / inactive or employed / unemployed. • Business counts • Employee jobs • Job densities
<p>5. To encourage sustainable economic growth.</p>	<ul style="list-style-type: none"> • Will the plan / policy help attract workers, residents, businesses and / or investors to the Borough? • Will the plan / policy improve the range of sustainable employment sites? • Will the plan / policy promote growth in the key sectors of the Borough's economy? • Will the plan / policy enable the Borough to take advantage of major investment nearby? • Will the plan / policy deliver regeneration to / promote the economic growth of urban areas and the vitality / viability of town centres? • Will the plan / policy increase the economic benefit derived from the Borough's natural environment? 	<ul style="list-style-type: none"> • Land / floorspace take-up for employment purposes; • Loss of employment land (designated or otherwise); • % of units in retail/town centre uses within Town Centres; • % of town centre ground floor units which are vacant; • Amount (floorspace) of commercial, office, retail and leisure developed in / out of town centres.
<p>6. To facilitate diversification of the rural economy.</p>	<ul style="list-style-type: none"> • Will the plan / policy support sustainable rural diversification? • Will the plan / policy encourage and support the growth of sustainable rural businesses? • Will the plan / policy retain or promote access to and provision of services in rural areas? • Will the plan / policy promote the sustainable economic growth of villages and smaller settlements? 	<ul style="list-style-type: none"> • No. of business start-ups • Amount of new employment floorspace created in rural areas

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Objective	Locally distinctive sub-criteria	Indicators
<p>7. To seek to meet the housing needs of all sections of society.</p>	<ul style="list-style-type: none"> • Will the plan / policy provide for an appropriate mix of housing to meet all needs including affordable housing and / or housing for the elderly? • Will the plan / policy support the creation of sustainable settlements with an appropriate balance of residents? • Will the plan / policy support the provision of ‘non-mainstream’ housing e.g. gypsy and traveller sites, other caravan dwellers, houseboats, student accommodation? 	<ul style="list-style-type: none"> • Housing completions against Local Plan targets; • Number / % of vacant dwellings; • Number of demolitions; • Number / % affordable housing permissions / completions; • Average house price (or ratio of lower quartile price : salary); • No. of authorised pitches / plots provided for Travellers; • Amount of student accommodation provided.
<p>8. To contribute towards an efficient, equitable, safe, and environmentally ‘sustainable’ transport system / network.</p>	<ul style="list-style-type: none"> • Will the plan / policy improve the efficiency of the transport network? • Will the plan / policy help reduce vehicular traffic and congestion? • Will the plan / policy increase access to and opportunities for walking, cycling (‘active travel’) and use of public transport? • Will the plan / policy reduce the number of people killed or seriously injured on the roads? • Will the plan / policy reduce or minimise emissions of greenhouse gases? • Will the plan / policy help improve air quality? • Will the plan / policy promote the use of locally produced or sourced goods and materials? 	<ul style="list-style-type: none"> • Length of new cycleways and other ‘greenways’ (Linear Parks, etc.) provided / improved; • Average distance travelled to work; • Mode of transport to work; • % of new development granted permission / completed within 400m of a bus stop or 800m of a railway station; • Proportion of new housing within 1km of 5 basic services. • Air quality / number of areas of AQMA
<p>9. To preserve and enhance the Borough’s land resources.</p>	<ul style="list-style-type: none"> • Will the plan / policy reduce the amount of vacant, derelict, and contaminated land? • Will the plan / policy encourage the use of brownfield land in preference to greenfield land? • Will the plan / policy minimise or reduce the loss of high quality (best and most versatile) agricultural land and / or soil in general? • Will the plan / policy achieve the efficient use of land via appropriate density of development? • Will the plan / policy reduce the amount of waste generated by development? • Will the plan / policy promote the use of recycled, reclaimed and secondary materials? 	<ul style="list-style-type: none"> • % of new dwellings granted permission / completed on previously developed land; • Density of new residential development; • Area of brownfield land developed for housing / employment / retail; • Area of prime agricultural land lost to development; • % of waste going to landfill / recycled.

Objective	Locally distinctive sub-criteria	Indicators
<p>10. To conserve, and, where possible, enhance, and to recognise the added value of, the built and cultural heritage and environment of the Borough.</p>	<ul style="list-style-type: none"> • Will the plan / policy improve the quality of the built and historic environment? • Will the plan / policy support the conservation and enhancement of high quality built, natural and historic environments within the Borough (whether designated or not)? • Will the plan / policy protect and enhance the character and appearance of the Borough’s landscape, strengthening local distinctiveness and sense of place? • Will the plan / policy improve access to / understanding of buildings and other assets of historic and cultural value? 	<ul style="list-style-type: none"> • Number of heritage assets lost / ‘at risk’; • Number of Listed Buildings on ‘At Risk Register’. • Number of locally listed heritage assets.
<p>11. To minimise contributions towards climate change, mitigate the impacts of climate change, and protect against flood risk.</p>	<ul style="list-style-type: none"> • Will the plan / policy minimise the need for carbon-based energy generation / use? • Will the plan / policy maximise the production / deployment of renewable energy? • Will the plan / policy encourage new developments to achieve zero carbon? • Will the plan / policy help reduce or manage flood risk? • Will the plan / policy help improve resilience to the likely effects of climate change? 	<ul style="list-style-type: none"> • SAP rating of local authority-owned (and other) dwellings; • Renewable energy developments granted permission (number / type / capacity); • Number of new dwellings achieving zero carbon • Number of new commercial dwellings achieving BREEAM or comparable standards • Annual incidents of flooding within the Borough; • Number of planning applications allowed contrary to EA / LLFA advice on flood risk. • Number of planning applications granted in Flood Zones 2/3, where considered appropriate by the EA / LLFA / Decision makers • Number of new trees planted
<p>12. To protect ‘water assets’ and ensure an adequate supply of water and means of disposing of wastewater.</p>	<ul style="list-style-type: none"> • Will the plan / policy help improve the quality of water resources in the area? • Will the plan / policy maintain / enhance ground water (incl. aquifer) quality? • Will the plan / policy help, or minimise effects upon, water supply? • Will the plan / policy minimise / reduce the amount of wastewater generated by development? 	<ul style="list-style-type: none"> • % of watercourse length within the Borough with good to fair water quality.

Objective	Locally distinctive sub-criteria	Indicators
<p>13. To protect, maintain and enhance the biodiversity assets of the Borough.</p>	<ul style="list-style-type: none"> • Will the plan / policy protect and / or enhance the biodiversity or geodiversity of the Borough? • Will the plan / policy protect and / or enhance habitats, species and damaged sites? • Will the plan / policy provide opportunities for new habitat creation? • Will the plan / policy protect and / or extend habitat connectivity and landscape permeability, suitable for species migration? 	<ul style="list-style-type: none"> • Number of Section 106 Agreements to mitigate harm to biodiversity; • Number of sites protected for their environmental / biodiversity / geodiversity value within the Borough. • % of SSSIs (by area) in favourable / recovering condition; • % of planning applications approved on an SSSI / BHS; • The number of protected sites that have been lost or damaged due to development. • Number / % of sites delivering biodiversity net gain • Hectares of biodiversity habitat delivered through strategic site allocations • Percentage of planning approvals, likely to have an impact on wildlife, where the Council negotiated provisions for a net gain in biodiversity • Number of planning applications refused or withdrawn in part due to their lack of consideration of biodiversity impacts • Number of planning applications which secure / achieve biodiversity net gain

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1.7 Sustainability Appraisal Topic Areas

- 1.7.1 In preparing the evidence base for the Local Plan, Thematic & Spatial Evidence Papers ('TSEPs') were prepared on 11 different subjects (themes). From these TSEPs, sustainability-related issues affecting West Lancashire were identified, and from the issues, 13 sustainability-related objectives were drawn up. These 13 objectives, along with their locally distinctive sub-criteria and proposed indicators, form the framework for the SA of the Local Plan (Section 1.6).
- 1.7.2 Table 1.2 below shows how the Local Plan evidence base topic areas cover the matters set out in the SEA Directive. The 11 TSEPs cover the SEA Directive topics and others besides.

Table 1.2 Relationship between SEA Directive topics and WLBC topic papers

SEA Directive topic	Local Plan TSEP covering this topic
a) Biodiversity	10. Biodiversity
b) Population	1. Population and social inclusion
c) Human Health	1. Population and social inclusion
d) Fauna	10. Biodiversity
e) Flora	10. Biodiversity
f) Soil	5. Land resources
g) Water	8. Water quality and resources
h) Air	9. Air quality
i) Climatic Factors	7. Climate change, energy and flooding
j) Material Assets	2. Housing; 3. Local economy and employment; 4. Transport; 11. Local services and community infrastructure
k) Cultural Heritage – including archaeological, architectural heritage	6. Cultural heritage and landscape
l) Landscape	6. Cultural heritage and landscape

- 1.7.3 Table 1.3 overleaf shows how the Sustainability Objectives in the SA Framework link to the TSEPs and also to the SEA Directive topics. Some links are indirect (and 'material assets' is taken to include housing, employment sites, and 'hard' infrastructure such as roads and schools).

Table 1.3 Relationship between Sustainability Objectives and TSEP / SEA Directive topics

SA objective (Local Plan)	Link with LPR TSEP	Link with SEA Directive topic
1. To cater for the needs of an ageing population.	TSEP1	b) Population c) Human health
2. To reduce Borough-wide inequalities with regard to learning, skills, educational attainment, and employability.	TSEP1	c) Human health (indirect link)
3. To improve health and well-being and reduce inequalities.	TSEP1	c) Human health
4. To reduce economic inactivity and disparities in employment.	TSEP1, 3	j) Material assets (indirect link)
5. To encourage sustainable economic growth.	TSEP3	j) Material assets (indirect link)
6. To facilitate diversification of the rural economy.	TSEP3 (and 1)	j) Material assets (indirect link)
7. To seek to meet the housing needs of all sections of society.	TSEP2	j) Material assets (indirect link)
8. To contribute towards an efficient, equitable, safe, and environmentally 'sustainable' transport system / network.	TSEP4, 9	h) Air quality j) Material assets (indirect link)
9. To preserve and enhance the Borough's land resources.	TSEP5	f) Soil l) Landscape
10. To preserve, and, where possible, enhance, and to recognise the added value of the built and cultural heritage and environment of the Borough.	TSEP5	k) Cultural heritage
11. To minimise contributions towards climate change, to mitigate the impacts of climate change, and protect against flood risk.	TSEP7	i) Climatic factors
12. To protect 'water assets' and ensure an adequate supply of water and means of disposing of wastewater.	TSEP8	g) Water
13. To protect, maintain and enhance the biodiversity assets of the Borough.	TSEP10	a) Biodiversity d) Fauna e) Flora

1.7.4 Table 1.4 below groups the 13 SA Objectives into 11 topic areas (which are actually the same as the TSEP topics). The sustainability of the policy options in the emerging Local Plan will be assessed using these topic areas in this order, rather than the SA Objectives in their order. A table of the 11 topic areas and their locally distinctive sub-criteria is provided in the appendices to this report.

Table 1.4 SA Topic Areas and their relationship with SA Scoping Objectives

SA Topic Area	SA Scoping Objective
1. Population and social inclusion	<ol style="list-style-type: none"> 1. To cater for the needs of an ageing population. 2. To reduce Borough-wide inequalities with regard to learning, skills, educational attainment, and employability. 3. To improve health and well-being and reduce inequalities.
2. Housing	<ol style="list-style-type: none"> 7. To seek to meet the housing needs of all sections of society.
3. Local economy and employment	<ol style="list-style-type: none"> 4. To reduce economic inactivity and disparities in employment. 5. To encourage sustainable economic growth. 6. To facilitate diversification of the rural economy.
4. Transport	<ol style="list-style-type: none"> 8. To contribute towards an efficient, equitable, and environmentally 'sustainable' transport system / network.
5. Land resources	<ol style="list-style-type: none"> 9. To preserve and enhance the Borough's land resources.
6. Cultural heritage and landscape	<ol style="list-style-type: none"> 10. To preserve, and, where possible, enhance, and to recognise the added value of the built and cultural heritage and environment of the Borough (this objective includes landscape).
7. Climate change, energy and flooding	<ol style="list-style-type: none"> 11. To minimise contributions towards climate change, to mitigate the impacts of climate change, and protect against flood risk.
8. Water quality and resources	<ol style="list-style-type: none"> 12. To protect 'water assets' and ensure an adequate supply of water and means of disposing of wastewater.
9. Air quality	<ol style="list-style-type: none"> 8. To contribute towards an efficient, equitable, and environmentally 'sustainable' transport system / network. (This objective covers air quality)
10. Biodiversity	<ol style="list-style-type: none"> 13. To protect, maintain and enhance the biodiversity assets of the Borough
11. Local services and community infrastructure	<ol style="list-style-type: none"> 3. To improve health and well-being and reduce inequalities. 8. To contribute towards an efficient, equitable, and environmentally 'sustainable' transport system / network.

2. Assessment of Local Plan Objectives against SA Topics

- 2.1.1 This chapter sets out the proposed overarching (or 'strategic') objectives of the Local Plan and assesses their compatibility with the 13 SA Objectives.
- 2.1.2 The Local Plan Objectives are necessarily focused on matters that planning can directly influence but, where possible, they refer to the wider benefits good planning will have on other factors. The objectives must stem directly from identified issues, relate to [any combination of] the three pillars of sustainability (economic, social, environmental), and to be written in such a way that the effects of policies or proposals can be measured against them.
- 2.1.3 In 2015, through the 2030 Agenda for Sustainable Development, the UN set 17 goals for sustainable development, which were adopted unanimously by 193 countries, including the UK, and address the three dimensions of sustainable development. Whilst it is not mandatory for Local Plans to embed these Sustainable Development Goals (SDGs), the NPPF (2021) (paragraph 7) does acknowledge their wider value in pursuing sustainable development to 2030. As all the SDGs directly or indirectly relate to planning, it seems appropriate to consider the SDGs through the SA Objectives. Consequently, nearly all of the UN SDGs tie in to one or more of the SA Objectives.
- 2.1.4 The proposed Local Plan Objectives are as follows:

- **Objective 1: Sustainable Communities**

To ensure sustainability is a guiding principle within our communities providing a balanced mix of housing tenures and types, employment opportunities and access to services and the natural environment by adapting the principles set out within the United Nations Sustainable Development Agenda 2030.

- **Objective 2: A Healthy Population**

To encourage the improvement of the health and wellbeing of the population of West Lancashire by encouraging a healthier lifestyle through the way that new development is planned and designed, increasing and improving the network of green spaces and Linear Parks, waterways, Sport and Recreation spaces across the Borough and improving access to health and community facilities. To tackle health inequalities, especially within young people, focusing on areas of social deprivation.

- **Objective 3: A High Quality Built Environment**

To ensure that new development is designed to a high quality, recognising the importance of the climate emergency, reduced natural resources and pollution and the requirement to drastically reduce carbon emissions and ensuring that the Borough's historic features and their settings are conserved and enhanced.

- **Objective 4: Addressing Climate Change**

To work proactively towards making a meaningful contribution to meeting greenhouse gas reduction / zero net carbon targets, including by encouraging Renewable Energy and low carbon development (e.g. Solar, Onshore and Offshore Wind, Ground and Air source heat technologies, localised district energy schemes) and to drive energy and water efficiency improvements in new buildings.

- **Objective 5: Reduced Inequality**

To plan for new development and improved infrastructure in ways which reduce inequality by addressing areas of identified and hidden deprivation across the Borough, seeking to address inequality to the most disadvantaged members of our communities and encourage strong community cohesion and diversity.

- **Objective 6: The Right Mix of Housing**

To provide a wide range of housing types and tenures in appropriate locations to meet the needs of West Lancashire's growing population, including affordable housing, accommodation for older people, student accommodation, houses of multiple occupation, gypsy and travellers and residential caravans and house boats.

- **Objective 7: A Vitalized Economy**

To provide opportunities for appropriate new developments that will see the Borough play an increased role within the three City Regions by encouraging businesses to establish themselves in West Lancashire.

- **Objective 8: Vibrant Town and Village Centres**

To enable the Borough's Town and Village Centres to establish themselves and evolve to meet the aspirations of the ambitious West Lancashire Vision and so build on the vitality and vibrancy so valued at the heart of each community.

- **Objective 9: Accessible Services**

To enable, encourage and plan for greater connectivity to a wide range of services to all parts of the Borough with an emphasis in providing ways of moving across the Borough as an alternative to car travel, making appropriate provision, or re-provision, of new facilities in the most accessible locations and locating development in accessible and sustainable locations.

- **Objective 10: A Natural Environment**

To improve and make the most of our "green" Borough by protecting and enhancing the natural environment, including biodiversity and a network of green spaces, waterways and connecting Linear Parks, facilitating the visitor economy, supporting the agricultural and horticultural industries and generally enabling rural communities to thrive.

2.1.5 Table 2.1 below compares the 10 Local Plan Objectives with the 13 SA Objectives, putting a **Y** where the two objectives are consistent. It can be seen that each Local Plan Objective is consistent with at least one SA Objective, and that each SA Objective covers at least one Local Plan Objective. This implies that, as a whole, the overarching / 'strategic' Local Plan Objectives address the SA framework.

2.1.6 Table 2.1 also shows that a number of the Local Plan Objectives each address several SA objectives, for example those relating to a vitalised economy, reduced inequality, and a natural environment. This reflects the implicit consideration given to the economic, social and environmental tenets of sustainability in the Local Plan.

Table 2.1 Assessment of Proposed Local Plan Objectives against the Sustainability Appraisal Objectives

Local Plan Objective	1: Sustainable communities	2: A healthy population	3: A high quality built environment	4: Addressing climate change	5: Reduced inequality	6: The right mix of housing	7: A vitalised economy	8: Vibrant town and village centres	9: Accessible services	10: A natural environment
SA Objective										
1 To cater for the needs of an ageing population	Y	Y		Y	Y	Y				
2 To reduce Borough-wide inequalities with regard to learning, skills, educational attainment, and employability	Y				Y					
3 To improve health and well-being and reduce inequalities	Y	Y		Y	Y				Y	
4 To reduce economic inactivity and disparities in employment	Y				Y		Y		Y	
5 To encourage sustainable economic growth	Y			Y			Y	Y	Y	
6 To facilitate diversification of the rural economy							Y	Y	Y	Y
7 To seek to meet the housing needs of all sections of society	Y			Y	Y	Y				
8 To contribute towards an efficient, equitable, safe & environmentally sustainable transport system / network	Y			Y					Y	
9 To preserve and enhance the Borough's land resources			Y	Y						Y
10 To preserve & where possible enhance, and to recognise the added value of the built and cultural heritage and environment of the Borough			Y	Y						Y

Local Plan Objective	1: Sustainable communities	2: A healthy population	3: A high quality built environment	4: Addressing climate change	5: Reduced inequality	6: The right mix of housing	7: A vitalised economy	8: Vibrant town and village centres	9: Accessible services	10: A natural environment
SA Objective										
11 To minimise contributions towards climate change, to mitigate the impacts of climate change & protect against flood risk		Y	Y	Y	Y					Y
12 To protect 'water assets' & ensure an adequate supply of water and means of disposing of wastewater			Y	Y						Y
13 To protect, maintain and enhance the biodiversity assets of the Borough.	Y	Y		Y						Y

3. Sustainability Appraisal of Local Plan Policy Options

3.1.1 This chapter presents the findings of the sustainability appraisals of each of the policy options for the West Lancashire Local Plan, having been assessed against the Framework outlined in Section 1.6 above. Policy options are grouped across six themes:

- **Strategic**
 - ST01 - Sustainable Development
 - ST02a - *Housing requirements**
 - ST02b - *Employment land requirements**
 - ST02c - *Spatial Distribution**
 - ST03 - Climate change and environmental sustainability
 - ST04 - Settlement boundaries
 - ST05 - *Strategic sites**

- **Housing and Communities**
 - HC01a – Where housing can be located
 - HC01b – Using land efficiently – (i) brownfield development & (ii) density
 - HC01c – Dwelling sizes
 - HC01d – Affordable housing
 - HC01e – Housing for older people
 - HC01f – Custom and self-build housing
 - HC01g – Accommodation for students
 - HC01h – Caravan and houseboat dwellers
 - HC01i – Gypsy, Traveller and Travelling Show People
 - HC01j – Temporary agricultural workers dwellings
 - HC02 – Place-making
 - HC03 – Heritage
 - HC04 – Community Facilities

- **Economy and Employment**
 - EE01 – Employment Areas
 - EE02 – Rural economy
 - EE03 – Town Centres
 - EE04a – Education / Edge Hill University
 - EE04b – Education / Skills and training

- **Environment and Health**
 - EH01 – Preserving and enhancing the Borough's nature
 - EC02 – Landscape and land resources
 - EH03 – Flood risk and water resources
 - EH04 – Contamination and pollution
 - EH05 – Air quality
 - EH06 – Green infrastructure and open spaces (4 approaches)
 - EH07 – Healthy eating and drinking

- **Transport and Infrastructure**

- TI01 – Transport network and access
- TI02 – Parking standards and electric vehicle charging points
- TI03 – Digital connectivity
- TI04 – Low carbon and renewable energy
- TI05 – Energy efficiency in new developments
- TI06 – Water efficiency in new residential developments

- **Other**

- OT01 – Sequential tests
- OT02 – Viability
- OT03 – Developer contributions

** These have been identified as being necessary strategic policies in the emerging Local Plan. However, evidence in relation to housing and employment development needs is still being finalised at the point of preparing this Sustainability Appraisal, and, until that evidence is completed, options cannot be prepared nor subsequently appraised in terms of their sustainability. It is anticipated that these strategic policies will be included in the next stage of the Local Plan process, as we identify development needs and strategic development sites, and be accompanied by a sustainability appraisal at that time.*

3.1.2 All of the policy options are listed below, along with a summary of the conclusions from the appraisal of each option. The full appraisals of each option are set out in detail in the appendices to this SA Report. Further details on the options, and the issues to which they relate, can be found through the Local Plan Issues and Options consultation documentation.

3.1.3 Whilst this SA appraises all of the policy options to assess the most sustainable option, it may be, in practice, that ultimately that option is not the most feasible in a small number of cases – for example, it is impracticable or unviable to deliver - and therefore a 'hybrid' approach of options may be more appropriate. The SA therefore forms part of the wider iterative process of plan making, helping to identify and avoid, or mitigate, any of the more detrimental impacts whilst promoting and supporting the most sustainable approaches.

STRATEGIC POLICIES

ST01 – Delivering sustainable development

Summary of options:

1. **'Standard' settlement hierarchy and NPPF presumption** – this sets out a settlement hierarchy based on the findings of the West Lancashire Sustainable Settlement Study 2021, essentially the same as the 'baseline' hierarchy (summarised below). Most new development would be directed to the settlements at or towards the top of the hierarchy, as these tend to be the most sustainable locations for new development. The policy would also include the NPPF 'presumption in favour of sustainable development' as this is at the centre of national planning policy and is required to play a key role in local plans
2. **Variation to settlement hierarchy** – this alternative option varies the settlement hierarchy from the 2021 Study, putting some settlements with fewer services towards the top levels of the hierarchy, and some settlements with more services lower in the hierarchy.

Overview of current baseline:

- The current WLLP has a settlement hierarchy based on a previous version of the West Lancashire Sustainable Settlement Study, with Skelmersdale with Up Holland, Ormskirk with Aughton, and Burscough at the top, then Key Sustainable Villages (Tarleton with Hesketh Bank, Parbold, Banks), Rural Sustainable Villages, and Small Rural Villages at the bottom.
- The main differences between the WLLP settlement hierarchy and the 2021 Sustainable Settlement Study is that Ormskirk is in the top tier (previously second), Tarleton is in the second tier (previously third), and Banks in the fourth tier (previously third).

Summary of Sustainability Appraisal

- Option 1 is very similar to the baseline position. Overall, it would be expected that there would be no, or insignificant, effects relative to the baseline position, and whilst there could be minor positive or negative effects, the likelihood of these effects will be determined primarily by policy ST02 (distribution of development) rather than by this policy, so the overall effect is considered to be neutral relative to the baseline.
- Option 2 uses a settlement hierarchy that departs from the findings of the Sustainable Settlement Study and is most likely to have negative effects under a number of Topic Areas relative to the baseline on account of less good links to services and facilities.
- ***Overall, Option 1 is considered the more sustainable.***

ST02a – Housing requirements

ST02b – Employment land requirements

ST02c – Spatial distribution of development

Whilst we have determined policies will be required relating to housing and employment land requirements, spatial distribution of that development, and strategic sites, the actual detail of the policy options will only be developed at later stages of the Local Plan preparation process. Evidence in relation to housing and employment development needs is still being finalised at the point of preparing this Sustainability Appraisal, and, until that evidence is completed, options cannot be prepared nor subsequently appraised in terms of their sustainability. It is anticipated that these strategic policies will be included in the next stage of the Local Plan process, as we identify development needs and choose preferred development sites; these policies will be accompanied by a sustainability appraisal at that time.

ST03 – Climate change and environmental sustainability

Summary of options:

1. A new strategic policy. This approach would see the introduction of a new strategic policy governing climate change and environmental sustainability, in response to the climate emergency declaration made by the Council. It would support ambitions to achieve net zero by embedding such climate and environmental sustainability considerations at the heart of all development proposals.
2. Have no strategic policy. This approach would be similar to the current Local Plan and would have no strategic policy governing climate change and environmental sustainability.
3. Introduce a more prescriptive policy. This approach would set detailed requirements through the strategic policy.

Overview of current baseline:

- The baseline position comprises a range of adopted Local Plan Policies, the National Planning Policy Framework, National Planning Practice Guidance, Building Regulations Approved Document L (Conservation of Fuel and Power) and national legislation e.g. the Climate Change Act 2008. Relevant adopted Local Plan policies are: GN3: Criteria for Sustainable Development, IF2: Enhancing Sustainable Transport Choice, EN2: Preserving and Enhancing West Lancashire’s Natural Environment, EN3: Provision of Green Infrastructure and Open Recreation Space and EN1: Low Carbon Development and Energy Infrastructure.

Summary of Sustainability Appraisal:

- Option 1 would have positive small positive effects in sustainability terms in relation to 6 topics (local economy and employment, transport, land resources, climate change / the climate emergency, energy and flooding, air quality and biodiversity).
- Option 2 has neutral effects in terms of sustainability because it represents the baseline position.
- Option 3 would have positive sustainability effects in relation to 3 topics (transport, climate change / the climate emergency and air quality) and small positive effects in relation to 6 topics (population, health and social inclusion, local economy and employment, land resources, water quality, biodiversity and local services and community infrastructure).
- None of the assessed options would have negative effects upon any topic and the quantity of positive effects are a reflection of the wide ranging nature of the policy approach and the fact that no strategic local plan policy currently exists which covers these matters.
- **Overall, option 3 would be the most sustainable.** However, it should be noted that, given the detailed requirements of option 3 across a range of policy areas, it would be very likely to result in a very long and complex policy. Local Plans are to be read as a whole so there would be practical advantages in providing a less detailed strategic policy, supported by a selection of more detailed policies (option 1).

ST04 – Settlement Boundaries

Summary of options:

1. A continuation of the WLLP policy GN1 approach with a slight relaxation to Protected Land policy – Within settlement boundaries, development will be permitted, subject to compliance with other Local Plan policies. Outside settlement boundaries, land will either be designated as Protected Land or Green Belt. Protected Land policy would be similar to that in WLLP GN1(b), except that more types of housing will be permitted (so that the designation is not more restrictive than a Green Belt designation). Green Belt policy would follow national policy.
2. Do away with the Protected Land designation – treat the land as greenfield sites within settlements or redesignate as Green Belt where the land is shown to fulfil at least one of the five Green Belt purposes.
3. Stronger protection for greenfield land within settlement boundaries – within settlement boundaries (on unallocated sites), a much stronger presumption in favour of brownfield land development over greenfield.

Overview of current baseline:

- The current WLLP allows for development within settlement boundaries, with a preference for brownfield development over greenfield. Protected Land is subject to restrictions on development (only affordable housing, up to 10 units), and Green Belt follows national policy.

Summary of Sustainability Appraisal:

- Option 1 is very similar to the baseline position. Overall, it would be expected that there would be no, or insignificant, effects relative to the baseline position, with one positive in relation to housing provision as a result of the slight relaxation of Protected Land policy.
- Option 2 would probably result in more housing development, so positive effects relative to the baseline in terms of housing provision, but negative effects in terms of land resources, landscape, water, and air quality.
- Option 3 would result in less housing development within settlements, but possibly more elsewhere. Its effects relative to the baseline tend to be the opposite of option 2.
- ***Overall, Option 1 is considered the most sustainable.***

ST05 – Strategic Sites

Again, as with ST02a-c, whilst we have determined policies will be required relating to housing and employment land requirements, spatial distribution of that development, and strategic sites, the actual detail of the policy options will only be developed at later stages of the Local Plan preparation process. Evidence in relation to housing and employment development needs is still being finalised at the point of preparing this Sustainability Appraisal, and, until that evidence is completed, options cannot be prepared nor subsequently appraised in terms of their sustainability. It is anticipated that these strategic policies will be included in the next stage of the Local Plan process, as we identify development needs and choose preferred development sites; these policies will be accompanied by a sustainability appraisal at that time.

HOUSING AND COMMUNITIES

HC01a – Where housing can be located

Summary of options:

1. A general policy on where housing should (and should not) be built. This would link to the first Strategic Development Policy ('Delivering Sustainable Development') but refer to residential development only.
2. Continue with the West Lancashire Local Plan 2012-2027 ('WLLP') current approach set out by Policy GN1 and supported by Policies SP1 and RS1.
3. Be more restrictive than under current WLLP policy set out by GN1 and supported by Policies SP1 and RS1.
4. Be less restrictive than under current WLLP policy set out by GN1 and supported by Policies SP1 and RS1.

Overview of current baseline:

- The baseline position comprises adopted Local Plan Policy GN1: Settlement Boundaries, supported by Policies SP1: A Sustainable Development Framework for West Lancashire and RS1: Residential Development. It also includes the National Planning Policy Framework and National Planning Practice Guidance, particularly in terms of how this relates to Green Belt. Option 2 therefore represents the baseline position.

Summary of Sustainability Appraisal:

- Option 1 is likely to be slightly better in terms of sustainability compared to the baseline position as it would have a positive effect in relation to the housing topic but an uncertain negative effect upon land resources.
- Option 2 represents the baseline situation so has a neutral effect in sustainability terms.
- Option 3 would have positive sustainability effects upon two topics (land resources and cultural heritage and landscape) but would have negative effects upon 3 topics (Population, Health and Social Inclusion, Housing and Local services and community infrastructure). As such, if each topic is given equal weigh this option would be a little less sustainable than the baseline.
- Option 4 would be a less restrictive approach, but in doing so, could result in more housing on Protected land, and could have more negative effects on the sustainability of land resources and landscape.
- ***As such, Option 1 would be the most sustainable.***

HC01b(i) – Using land efficiently: Brownfield vs greenfield development

Summary of options:

1. To broadly follow national policy, encouraging the residential development of brownfield sites in preference to greenfield sites wherever possible, subject to viability.
2. Have no preference for brownfield land over greenfield land development.
3. A more rigorous 'sequential' or 'phased' approach towards brownfield land development, requiring all suitable brownfield sites within a settlement to be considered for development first before development of greenfield sites, subject to viability.

Overview of current baseline:

- The baseline position comprises the National Planning Policy Framework, National Planning Practice Guidance (Effective use of land in particular) and the adopted Local Plan. In terms of the latter, relevant policies are primarily GN1: Settlement Boundaries and RS1: Residential Development; the former indicates when it may be appropriate to develop on brownfield and greenfield sites and the latter indicates appropriate densities for residential development.

Summary of Sustainability Appraisal:

- Option 1 would have neutral effects in terms of sustainability as it closely resembles the baseline position.
- Option 2 would have negative effects in relation to the population, health and social inclusion, housing, land resources and cultural heritage and landscape topics and is therefore less sustainable compared to the baseline position.
- Option 3 would have positive effects compared to the baseline in relation to the land resources and cultural heritage and landscape topics.
- ***Overall, Option 3 would be the most sustainable.***

HC01b(ii) – Using land efficiently: Housing density

Summary of options:

1. Require the same housing density for all areas, using the 'standard' minimum 30 dwellings per hectare cited in WLLP Policy RS1: Residential Development.
2. Higher densities on all sites (say a minimum site density of 35 dwellings per hectare) in order to reduce the amount of land needed for building new homes.
3. Allow / require lower density development on all sites in order to give people larger garden areas and / or more publicly accessible open space / space for nature.

Overview of current baseline:

- The baseline position comprises the National Planning Policy Framework, National Planning Practice Guidance (Effective use of land) and adopted Local Plan Policy RS1: Residential Development which indicates appropriate densities for residential development.

Summary of Sustainability Appraisal:

- Option 1 would have neutral effects in terms of sustainability as it closely resembles the baseline position.
- Option 2 would have positive effects in relation to the population, health and social inclusion, land resources and cultural heritage and landscape topics and is therefore more sustainable compared to the baseline position.
- Option 3 would have negative effects compared to the baseline in relation to the same population, health and social inclusion, land resources and cultural heritage and landscape topics and is therefore less sustainable compared to the baseline.
- ***Overall, option 2 would be the most sustainable.***

HC01c – Dwelling sizes

Summary of options:

1. Require a mix of dwelling sizes for new developments, based on the Council's evidence base
2. Exercise no control over dwelling sizes – let the developers build what they want
3. Exercise strict control over dwelling sizes – setting out the required proportions and not allowing variation apart from in exceptional circumstances

Overview of current baseline:

- There is no policy in the current WLLP governing dwelling sizes. The NPPF states that, in considering housing supply, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Most new dwellings built in the Borough are 3 or 4 bedroomed (AMR 2021). Option 2 is therefore most aligned to current policy (or the absence of it) which sets no requirements in respect of dwelling sizes

Summary of Sustainability Appraisal:

- Option 1 would provide greater control over dwelling sizes, supporting the provision of housing in relation to identified need. As a starting point for negotiation, it could help to address identified needs whilst also providing sufficient flexibility if there were other local, relevant considerations proffered by the developer. It would help provide more balanced communities by providing a greater mix of housing to address the needs of all.

- Option 2 is most aligned to current policy (or the absence of it) which sets no requirements in respect of dwelling sizes and therefore provides no control over dwelling sizes in relation to identified need. It would be expected that there would still remain an unbalanced distribution of new dwelling sizes.
- Option 3 would exercise the strictest control over dwelling sizes, which would make it difficult to respond to changing needs. For example, during COVID-19, demand for larger houses increased because people wanted additional rooms as home-office space.
- **Overall, Option 1 is considered the most sustainable.**

HC01d – Affordable housing

Summary of options:

1. To continue to support 100% affordable housing (AH) schemes, and require a percentage of homes in developments of 10 or more dwellings be affordable
2. Go for the minimum amount of affordable housing (as national policy) so to deliver other 'benefits', e.g. green-housing, biodiversity or infrastructure
3. Go for the greatest possible amount of affordable housing at the expense of other 'good to have's'

Overview of current baseline:

- WLLP Policy RS2: To support 100% affordable housing (AH) schemes and require a percentage of homes in developments of 10 or more dwellings be affordable. Option 1 generally continues the current baseline.

Summary of Sustainability Appraisal

- Option 1 is the option most aligned to current policy. It supports the provision of affordable housing, in line with national policy, so enabling people to access affordable housing which can help provide stability and support health and wellbeing. A greater range of housing opportunities better caters to the needs of the population and supports wider social inclusion.
- Option 2 would provide a minimum amount of affordable housing, which would enable fewer people to access affordable housing, but could financially open up greater opportunities for other improvements, including those to tackle the climate emergency – such as net zero homes, or energy efficiencies.
- Option 3 would pursue a maximum amount of affordable housing but at the likely expense of those other improvement opportunities, including those to tackle the climate emergency
- **Overall, option(s) 1 and 2 are considered the most sustainable.**

HC01e – Housing for Older People

Summary of options:

1. Support the provision of accommodation for older people in appropriate and sustainable locations within settlements, requiring that new properties are accessible and adaptable, and supporting the development of care home / extra care home bedspace to meet identified needs, allocating specific sites for them where necessary.
2. Have no prescriptive policies and let the market deliver housing as it sees fit.
3. Have a more prescriptive policy to seek to achieve as much housing as possible for older people, with requirements for adaptable homes, and that a percentage of homes on large development sites be designed for older people.

Overview of current baseline:

- WLLP Policy RS1 and Policy RS2. RS1 sets that older person's accommodation will be encouraged within new settlements, and that all new homes will be expected to meet design standards. RS2 sets that in schemes of 15 or more dwellings, 20% of new residential units should be designed specifically for the elderly. Option 1 and 3 are therefore most aligned to the current baseline position.

Summary of Sustainability Appraisal

- Option 1 would continue to support the provision of older people's accommodation in line with the existing baseline, but would also go further to allocate sites for care homes / extra care developments which would have a more positive effect on the provision of older peoples' housing supply.
- Option 2 would allow the market to deliver older persons housing as it sees fit, which, given the Borough's increasingly ageing population, could result in a greater amount of provision, flexible and responsive to demand. However, it could also result in less control over the amount, nature and location of that development which could have negative impacts on sustainability, accessibility and appropriate design.
- Option 3 would follow much of Option 1, but the approach would additionally seek to achieve as much housing as possible for older people. Whilst this would have the greatest positive effect on older persons housing supply, it may be too prescriptive and inflexible.
- ***Overall, option 1 is considered the most sustainable. A hybrid with option 3 may be the most sustainable approach.***

HC01f – Custom and Self-build Housing

Summary of options:

1. A specific policy on custom and self-build (C&SB) housing
2. Have no local policy on custom and self-build housing, leaving it to the market to deliver

Overview of current baseline:

- There is no policy in the current WLLP governing custom and self-build housing and so option 2 represents the current baseline. LPAs have a duty to give enough suitable development permissions to meet identified demand (NPPF footnote 26)

Summary of Sustainability Appraisal:

- Option 1 is more positive towards supporting C&SB housing, enabling the LPA to meet national requirements and to provide wider housing opportunities that better supports wider social inclusion and caters to the needs of the population, whilst also facilitating better planning / use of land resources and encouraging plots to be located in the most sustainable areas close to existing services.
- Option 2 is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of C&SB housing. It would not specifically help to provide C&SB housing.
- **Overall, Option 1 is considered the most sustainable.**

HC01g – Accommodation for students

Summary of options:

1. Continue the current approach to student HMOs. This option would involve minor alterations, including reducing the percentages of permitted HMOs permissible on most streets, with some streets set at 0% HMOs.
2. Have a more relaxed policy approach towards student accommodation than the present WLLP.
3. Have a tighter policy approach compared with the current WLLP, to allow no more HMOs within the Article 4 Direction area of Ormskirk / Aughton and Westhead. It would also restrict purpose-built student accommodation development on the university campus.

Overview of current baseline:

- WLLP Policy RS3 sets limits on the percentage of properties that can be HMOs in different streets and supports purpose-built student accommodation within the University Campus.

The Policy is applicable in conjunction with an Article 4 Direction relating to HMOs and covering Ormskirk and Aughton. Option 1 most closely aligns with the current baseline.

Summary of Sustainability Appraisal:

- Option 1 is most aligned to current policy (the baseline position), however it proposes minor alterations, including changes to HMO quotas. It is considered these changes would positively improve the sustainability of the policy.
- Option 2 would allow a more relaxed policy approach towards student accommodation than the current WLLP. However, it is considered that this would in negative effects with regard to services, infrastructure, housing and population when compared to the baseline.
- Option 3 restricts off campus accommodation and restricts purpose-built student accommodation to the University campus only, which would likely create a mix of positive and negative effects across the objectives.
- ***Overall, Option1 is considered the most sustainable.***

HC01h – Caravan and houseboat dwellers

Summary of options:

1. Continue with the current WLLP policy approach. i.e., support the rural economy in general, and treat proposals for expansion or enhancement of facilities on their merits, in accordance with ‘the usual’ policies (e.g., on Green Belt).
2. Plan positively for houseboat and residential caravan developments.
3. Plan less positively for caravan / houseboat development, restricting such uses in the Green Belt in order to preserve its openness.

Overview of current baseline:

- The existing baseline is the current WLLP policy approach. This seeks to support the rural economy in general and treat proposal for expansion or enhancement of facilities on their merits, in accordance with ‘the usual’ policies (e.g. on Green Belt).

Summary of Sustainability Appraisal:

- Option 1 would seek to continue with the current WLLP policy and therefore would have a neutral effect on the existing baseline position.
- Option 2 would pro-actively ensure that there is sufficient land within close proximity to services and transport links, although this could result in a loss of land resources or impact on the landscape.
- Option 3 is a more restrictive approach and would result in a negative effect when compared to the baseline in terms of housing, the local economy and social inclusion. As a result, this is the least sustainable of the options.

- **Overall, Option 1 would be the most sustainable option** as it continues with the existing current baseline would help support the rural economy and treats proposals for the expansion or enhancement of facilities on their merits, in accordance with other policies.

HC01i – Gypsies, Travellers and Travelling Show people (GTTS)

Summary of options

1. Allocate sites in which Travellers currently occupy, or own.
2. Allocate suitable sites (including through CPO) to meet Traveller needs in areas where Traveller needs exist
3. Set aside part of new housing / employment site allocations as Traveller sites
4. Leave the matter of a Traveller site allocation to a future DPD
5. A hybrid of options 1-3

Overview of current baseline:

- There is no GTTS policy in the current Local Plan, and so guidance 'defaults' to national policy. The NPPF should be read in conjunction with the Government's planning policy for traveller sites and sets that plans should reflect the different types of housing needed for different groups including travellers.

Summary of Sustainability Appraisal:

- Option 1 is closest aligned to the current baseline position but would serve to authorise those sites – a positive effect relative to the baseline.
- Option 2 is potentially more sustainable than the baseline and GTTS site allocations would create some positive effects in relation to health, social inclusion, housing and flooding. However, much of the outcomes are linked to the location of sites, which is not known at this time. Further assessment would be needed alongside the consideration of sites.
- Option 3 compares positively to the baseline and would create some positive effects in relation to health, social inclusion, housing and flooding. However, much of the outcomes are linked to the location of sites, which is not known at this time. Further assessment would be needed alongside the consideration of sites.
- Option 4 effectively delays the identification of GTTS sites, preventing them from being considered holistically within the Local Plan. It would fail to immediately address GTTS needs and effectively 'kicks the can' further down the road.
- Option 5, a hybrid of options 1,2 and 3, is considered the most sustainable and would do the most to ensure that GTTS sites could be flexibly delivered in accordance with need, and in the most sustainable locations, creating positive effects across many of the objectives. As before, many of the outcomes are linked to the location of sites, which is not known at this time, but this option enables the most flexible approach. Further assessment would be needed alongside the consideration of sites.
- **Overall, Option 5 is considered the most sustainable.**

HC01j – Accommodation for Temporary Agricultural Workers

Summary of options

1. Continue with a similar policy to current approach, which allows for the re-use of existing buildings, and for non-permanent accommodation (subject to certain criteria).
2. Have a more relaxed policy, allowing it in the countryside and Green Belt with minimal criteria to satisfy.
3. Have no policy at all on accommodation for temporary agricultural workers, but simply rely on national Green Belt/Countryside policy in general.

Overview of current baseline:

- WLLP Policy RS5 supports the re-use of existing buildings (in settlements and in the countryside, including the Green Belt) to accommodate temporary agricultural workers, provided it complies with other policy. It also allows for non-permanent accommodation subject to certain criteria, e.g., there exists a need, there are no existing buildings that could be used, the site is the most suitable in the area, and the impact is minimised / mitigated. Option 1 is therefore most closely aligned to the current baseline position.

Summary of Sustainability Appraisal:

- Option 1 is a continuation of current policy and therefore would have a neutral effect on the baseline position.
- Option 2 would seek to relax the existing policy on Temporary Agricultural workers accommodation which could lead to weaker control and have negative impacts on a number of the objectives.
- Option 3 would rely on National Green Belt / Countryside policy and give the Council less local control over accommodation for temporary agricultural workers, which would likely create negative effects on sustainability when compared to the current baseline.
- ***Overall, Option 1 is considered to be the most sustainable approach.***

HC02 – Place-making

Summary of options:

1. A set of principles for good 'place-making' that should be followed wherever possible, both for new ('greenfield / large empty site) development, and for schemes within existing built-up areas or settlements.
2. Have no Place Making policy.
3. Have site-specific development briefs.
4. Have a stronger policy.

Overview of current baseline:

- In the absence of an existing WLLP Policy, the current baseline is the NPPF, Chapter 12- Achieving well-designed places. It places the onus on the creation of high quality, beautiful and sustainable buildings and places being fundamental to what the planning and development process should achieve. It should create better places in which to live and work and help make development acceptable to communities.

Summary of Sustainability Appraisal:

- Option 1 would be the most sustainable option as it would promote good, sustainable design for development across the borough and would result in positive impacts for the majority of the objectives.
 - Option 2 would seek to continue to follow the existing National Policy approach and therefore would have a neutral effect on the existing baseline position.
 - Option 3 would be delivered in a site-specific manner therefore the positive benefits would not be felt borough wide, and so it is not the most sustainable of the options.
 - Option 4 is a stronger policy and so in principle could deliver the largest benefits to sustainability. However, a stricter policy could potentially stifle development due to being overly restrictive.
- ***Overall, Option 1 is considered the most sustainable.***

HC03 – Preserving and utilising our heritage

Summary of options:

1. A policy to preserve and enhance the Borough's cultural and heritage assets
2. Do not have a heritage policy (rely on national policy)
3. Have a very prescriptive policy

Overview of current baseline:

- The NPPF sets out the importance of conserving the historic environment. WLLP Policy EN4 then locally guides the preservation and enhancement West Lancashire's cultural and heritage assets. Option 1 therefore represents the current baseline position.

Summary of Sustainability Appraisal:

- Option 1 is the option most aligned to the current policy, and would just continue the baseline approach to preserve and enhance the Borough's cultural and heritage assets
- Option 2 would remove a local policy to rely solely on national policy to protect the historic environment from inappropriate development. This may allow more varied development, which could detrimentally affect the Borough's historic and cultural environment.
- Option 3 would lead to tighter, more prescriptive control over cultural and heritage assets, compared to the current baseline, but would lead to a more inflexible approach. This can often make it harder to preserve or enhance cultural and heritage assets.
- ***Overall, Option 1 is considered the most sustainable.***

HC04 – Community facilities

Summary of options:

1. A flexible approach to maintain some control over community facilities. This would let the market and community decide what facilities should be delivered and where but would have measures to help control the unnecessary loss of services.
2. Guide development in relation to specific development sites or infrastructure types. This would set out in detail which community facilities should be provided or protected in different locations across the Borough.
3. Do nothing to control the provision or loss of community facilities and rely on national policy instead.

Overview of current baseline:

- The baseline is represented by two Local Plan policies and the NPPF. Local Plan Policies IF1 and IF3 deal with community facilities. IF1 indicates that the loss of such facilities within centres will be resisted unless the facility is no longer needed, or the services provided by it can be served in a suitably accessible alternative location. Policy IF3 deals with community facilities more generally in terms of both new provision and their loss (including open space). Loss will be resisted unless it can be shown that the facility is no longer needed or can be relocated to an equally accessible location. The NPPF is also relevant and indicates that community facilities should be positively planned for and their unnecessary loss resisted. It also states that they should be retained to support the rural economy.
- Whilst none of the policy options exactly reflect the baseline position, option 1 represents the closest to it.

Summary of Sustainability Appraisal:

- Option 1 closely resembles the baseline situation so would have a neutral effect overall in relation to sustainability.
- Option 2 is more detailed and geographically focused, and would have positive effects in relation to population, health and social inclusion, local economy and employment and local services and community infrastructure topics. However, it would be more inflexible to changing / future needs of communities and market demand.
- Option 3 proposes no policy, instead relying upon national planning advice and market forces, so is inferior to the baseline as it could be expected to act on a more piecemeal basis. As such, negative effects have been identified in relation to the population, health and social inclusion, local economy and employment and local services and community infrastructure topics.
- ***On balance, Options 1 is considered the most sustainable because of its flexibility to future changing demands.***

ECONOMY AND EMPLOYMENT POLICIES

EE01 – Employment Areas

Summary of options:

1. Update and amend the existing policy. Reduce the number of existing 'core / traditional' employment areas. Identify business sectors that it would be desirable for the Borough to diversify towards. Outside the 'core' employment areas, allow a wider range of commercial uses in line with changes to the national Use Classes Order, e.g. shops. Set out when these areas could be redeveloped for non-commercial uses e.g. housing. (Additional employment areas for the new Local Plan period would be allocated under a different policy.)
2. Update the existing policy in a limited way to reflect the new amount of land needed for employment uses over the Local Plan period, as well as changes to the Use Classes Order.
3. Zone areas for a wide range of economic activities. Within these zones, there would be limited planning controls in order to encourage business growth akin to the former national Enterprise Zones.

Overview of current baseline:

- WLLP Policy EC1 sets out how much employment land is to be provided and designates three types of employment land around West Lancashire, affording to each varying levels of protection. National policy is set out in the NPPF and the recently revised Use Classes Order, allowing more flexibility in changing between certain employment uses and other commercial uses.

Summary of Sustainability Appraisal:

- Option 1 is judged to have no net effect relative to the baseline position. This is because it either carries on with the current Local Plan approach, or else makes changes that are in line with national policy. The current Local Plan and national policy represent the baseline.
- Option 2 is also judged to have no net effect relative to the baseline position for similar reasons to Option 1.
- Option 3 could have positive effects relative to the baseline position on three of the sustainability appraisal 'topic areas' but these depend on the location of the 'Zones' being in appropriate places and the occupants of the 'Zones' moving into the Borough from outside, rather than relocating within the Borough.
- ***Overall, if these criteria were met, Option 3 could be considered the most sustainable; otherwise all options are similar to the baseline position.***

EE02 – Rural Economy

Summary of options:

1. This option would be a little less restrictive than existing Local Plan policy. It would promote the protection of the countryside; would seek to protect viable existing rural employment, agricultural, tourist and visitor uses; 'employment uses' definition would include all job-creating uses. There would be specific rural development site allocation(s). Expansion / diversification of rural businesses would be encouraged at an appropriate scale. Development of best quality agricultural land would only be permitted where absolutely necessary.
2. Continue with existing Local Plan policy, i.e. protect the best quality agricultural land, protect existing rural employment sites and re-use existing buildings where they would be left vacant; allow rural business growth in certain circumstances; promote tourism of an appropriate scale.
3. Increased development in rural areas. This would entail the allocation of a greater quantity of land in rural areas for employment purposes. This may provide new opportunities for agricultural produce packing and distribution facilities and / or for rural technology hubs. It would support visitor attractions and larger scale commercial uses, for example larger farm shops.

Overview of current baseline:

- As per Option 2 above, WLLP policy EC2 protects the best quality agricultural land and existing rural employment sites; it allows for re-use of existing buildings where they would be left vacant; it allows for rural business growth in certain circumstances; it promotes tourism of an appropriate scale. National policy is set out in the NPPF and further clarification provided in Planning Practice Guidance.

Summary of Sustainability Appraisal:

- Option 1 is similar to current policy (and therefore the baseline position), although it allows for a wider variety of employment uses in rural areas which could result in more jobs and an improvement in the rural economy.
- Option 2 represents a continuation of current policy, and thus a continuation of the baseline position.
- Option 3 allocates more land for rural employment and should have economic and possibly minor (social) benefits compared to the baseline but could also result in environmental disbenefits.
- ***Overall, Option 1 is considered the most sustainable given its expected positive effects and lack of negative effects compared to the baseline position, although option 3 could also be considered sustainable if negative effects are avoided (e.g. by allocating the extra sites on non-sensitive brownfield land).***

EE03 – Town Centres

Summary of options:

1. One overarching policy for centres, with additional supporting policies / strategies for Burscough, Ormskirk and Skelmersdale centres. The overarching policy would include the centre hierarchy, the requirements for sequential and impact assessments, the approach towards deciding uses that would be permitted in centres, and when new stand-alone local convenience stores would be permitted. Development will need to be of an appropriate scale to the centre to which they relate and there would be a focus upon Skelmersdale to support the regeneration of the town. The policy would have local interpretations of the sequential approach and retail impact with minor variations from the national norm.

Proposals for new uses within centres would be considered in relation to their contribution towards commercial activity including having a pedestrian level shop front, being open for at least part of the day and whether the use would be one typically found in a town centre, etc.

A healthy eating and drinking policy would be separate from this policy.

2. Minimal changes to WLLP policy IF1: a single policy for all town centres; minimum amendments to IF1, i.e. the removal of the requirement for a minimum of 70% retail uses within primary shopping areas of town centres due to changes to the Use Classes Order. The policy would deal with the centre hierarchy, the requirements for sequential and impact assessments, and permitted uses in centres.
3. One single general policy (similar to the preferred approach) in relation to centres and appropriate uses but no additional and separate policies for Burscough, Ormskirk, and Skelmersdale town centres.
4. One overarching policy in relation to centres and appropriate uses with additional supporting policies for Burscough, Ormskirk and Skelmersdale town centres, but without a separate healthy eating and drinking policy - these matters (as much as they could be) would be dealt with through this town centre policy (meaning that matters such as distance of takeaways from schools wouldn't be dealt with).

Overview of current baseline:

- The baseline policy position comprises WLLP policy IF1: Maintaining Vibrant Town and Local Centres, and national policy, which includes recent amendments to the Use Classes Order and permitted development rights. The general situation has been affected by Covid-19 and the accelerated growth in online retailing.

Summary of Sustainability Appraisal:

- Option 1, which covers similar matters to current Local Plan policy IF1 and which is consistent with national policy (i.e. the baseline position), represents no change overall with regard to the baseline position. It scores positively against some sub-criteria, as does the baseline position.

- Option 2 also represents no change overall with regard to the baseline position, given its similarity to current WLLP policy IF1.
- Option 3 has a couple of minor negative effects compared to the baseline on account of there being no Skelmersdale, Ormskirk or Burscough-specific policy, which could result in less regeneration of Skelmersdale town centre, or a narrower distribution of services.
- Options 3 and 4 have no policy for distance of take-away from schools (outside town centres), which would represent a negative effect relative to the baseline as far as health is concerned for areas outside of town centres, but a positive effect for town centre areas.
- **Overall, option 1 is considered the most sustainable, having no negative effects relative to the baseline position, followed by option 2.**

EE04a – Skills and Education

Summary of options:

1. Support the continued development and improvement of Edge Hill University campus and its facilities, including new purpose-built student residential accommodation. Any growth beyond the existing campus would be either close by to the south of St Helens Road or within Ormskirk town centre. Require travel plans and parking strategies. to encourage sustainable travel, improve access to the campus and alleviate existing or new traffic impacts. Encourage links between the University and local businesses (information sharing and learning programmes) and seek benefits to more deprived local communities. (HMOs and off-campus student accommodation would be dealt with separately under the Housing topic.)
2. Have no policy for the University campus. The future development of the University would not be guided by a site-specific policy meaning that such development may be more likely to take place away from the existing campus. Future development on campus may also be less able to be managed in terms of mix and quality.
3. A more detailed policy or masterplan for the University campus. This would tightly control what is developed on-campus and where. This may reduce the flexibility for the University to respond to changing demands within the higher education sector.
4. A different location for the expansion of the University campus - a satellite campus elsewhere in Ormskirk or further afield in West Lancashire rather than expanding within or close to the existing campus. It would create additional movement of students between the main campus and satellite campus and would be less likely to provide as much purpose-built student accommodation thus resulting in student housing pressures in Ormskirk.
5. A policy to deal with the future of Edge Hill University and other education sites (schools, higher / further education). The policy would expand to provide a broad policy framework for their future development. This would be challenging both in terms of the scope of which education facilities to include or exclude and the flexibility a policy framework would require in order to deal with a range of different sites effectively.

Overview of current baseline:

- The current Local Plan has a policy on Edge Hill University ('EHU'), supporting its growth within the Campus and allocating former Green Belt land for expansion (now developed). It seeks 'where possible' to ensure the University's benefits are future growth are directed to communities where educational attainment is lower.

Summary of Sustainability Appraisal:

- Option 1 would be likely to have positive effects in terms of benefits to the local economy and jobs, but negative effects in terms of land (especially if the campus were to expand to agricultural land south of St Helens Road) and transport.
- Option 2 would have a mixture of negative and uncertain effects, as it would not be known how and where the University may seek to expand.
- Option 3 would have fewer negative effects as development on the University campus would be strictly controlled, but there would be no positive economic effects as the future growth and development of the University would be constrained.
- Option 4 would have a mixture of positive effects (spreading of economic benefits beyond Ormskirk) and negative effects (accommodation pressures and transport issues) as well as uncertainty – it would depend on the location of any satellite campus.
- Option 5 should have positive economic effects and should generally avoid negative effects relative to the baseline. There is uncertainty relating to what the framework would be for Edge Hill University under this option – effects would be as per options 1-3.
- **Overall, option(s) 1 and 5 are considered the most sustainable, depending on whether Edge Hill University expands in Ormskirk (more sustainable) or onto greenfield land (less sustainable).**

EE04b – Skills and training

Summary of options:

1. A skills and training policy. The employment of local people and use of local businesses during the construction and implementation stages of major development proposals would be promoted. Planning applications for major development would be expected to produce an employment and skills plan identifying opportunities for the employment and up-skilling of local people during the implementation phase. This policy would apply to schools, further education, and higher education.
2. Have no skills and training policy.

Overview of current baseline:

- The current Local Plan and its accompanying SPDs have no skills and training policy. The NPPF does not mention skills and training. Any skills and training provided are not as a result of planning policy.

Summary of Sustainability Appraisal:

- Option 1, having a skills and education policy, would provide social and economic sustainability benefits in terms of improving people's skills and possibly qualifications, and helping employment prospects compared to the baseline position, which has no such policy (the same as option 2).
- ***Option 1 is therefore clearly the more sustainable option.***

ENVIRONMENTAL AND HEALTH POLICIES

EH01 – Preserving and enhancing the Borough's nature

Summary of options:

1. Continue the current approach of WLLP Policy EN2, but include new requirement in relation to a 10% BNG
2. Continue the current approach of WLLP Policy EN2, but include new requirement in relation to a 20% BNG
3. Continue the current approach of WLLP Policy EN2, but with a 'banded' BNG requirement – for example, 10% in urban areas and 20% in areas with more diverse wildlife
4. Create a separate, specific Biodiversity Net Gain (BNG) policy (could be weaker or stronger than 10%). This would likely set out the details through a Supplementary Planning Document.

Overview of current baseline:

- The draft Environment Bill, expected to be enacted later in 2021, will require a minimum net gain in biodiversity of 10% for new development. Essentially, biodiversity net gain (BNG) could be dealt with as a new stand-alone policy or incorporated into a wider natural environment policy. Currently the baseline position is the NPPF, which sets out the importance of achieving environmental sustainability, including improving biodiversity and net gain, and WLLP Policy EN2: Preserving and enhancing West Lancashire's Natural Environment – which includes reference to nature conservation sites, priority species and habitats, trees and landscaping, land resources, coastal zones and landscape character.

Summary of Sustainability Appraisal

- Option 1 is the option most aligned to the baseline / current policy but would introduce the (emerging) national BNG requirement of 10%. The importance of increasing biodiversity is well-established, and the introduction of biodiversity net gain is a positive, sustainable step in addition to the existing baseline and/or continued policy.
- Option 2 would introduce a BNG requirement of 20%, above the national requirement. This would work to improve biodiversity beyond Government targets, which is an admirable and ambitious approach. However, increasing requirements could render some sites unviable making it harder to deliver wider improvements (i.e. it would be better to have some improvement than no improvements).
- Option 3 would be the most flexible approach, requiring a minimum of 10% but up to 20% on sites with more diverse wildlife, and is essentially a hybrid of options 1 and 2. It would be the most flexible approach to improving biodiversity in the Borough but would require the most substantial evidence base in order consider viability and identify clear boundaries for the banded requirements.
- Option 4 would create a specific BNG policy, supported by an SPD. It would be a more prescriptive approach and could help secure more BNG than that at present, potentially above the national 10%, with a figure, and all other requirements, determined based on gathered evidence.

- **Overall, option 3 is considered to be the most sustainable and flexible approach but is subject to the availability of sufficiently detailed evidence to identify clear boundaries for banded requirements. The remaining options are also subject to evidence relating to viability and biodiversity.**

EH02 – Landscape and land resources

Summary of options:

1. Continue the approach of WLLP Policy EN2: Preserving and Enhancing West Lancashire's Natural Environment, including Parts 4 (Land Resources), 5 (Coastal Zone) and 6 (Landscape Character).
2. Continue with existing policy but remove the Coastal Zone designation from both the Local Plan Policies Map and the policy. i.e. remove Part 5 of the existing Local Plan Policy EN2.
3. A less restrictive approach than existing Local plan Policy EN2.
4. A more prescriptive approach than existing Local Plan Policy EN2.

Overview of current baseline:

- The existing approach of EN2 has a restrictive approach to new development taking place on the best quality agricultural land (grades 1, 2 and 3a) and would limit uses within the designated Coastal Zones shown on the Local Plan Policies Map to the essential needs of coastal navigation, recreation, tourism and leisure, flood protection, fisheries, nature conservation and / or agriculture. Options 1 therefore represents the current baseline position.

Summary of Sustainability Appraisal:

- Option 1 is a continuation of current policy, and therefore has a neutral effect when compared to the baseline position.
- Option 2 seeks to remove the protection of the Coastal Zone from the original policy, and would, broadly, result in little change when compared to the baseline position, albeit could reduce some protection of that coastal zone.

Pending any further comments from Neil Mac.

- Option 3 would have a positive impact on housing in the Borough by potentially allowing additional development within West Lancashire's natural environment, however the negative impacts on the biodiversity of the Borough, climate change and the Borough's land resources would result in this option being less sustainable when compared to the existing baseline.
- Option 4 would restrict development and would require specific mitigation measures to help reduce the impact of a development proposal upon the Borough's landscape history and character. Whilst this would protect the Borough's land resource and biodiversity, it may restrict housing development, or direct it to an area where it is not

needed the most. Therefore, this option is not considered to be particularly sustainable when considered against the existing baseline.

- **Overall, Option 1 is considered the most sustainable.**

EH03 – Flood risk / water resources

Summary of options:

1. Update the existing WLLP policy to reflect advances in national guidance and practice and more recent local evidence on flood risk.
2. Continue with existing Local plan policy GN3- Part 3.
3. A new policy similar to the preferred policy approach but less strict about when a Flood Risk Assessment would be required with planning applications.

Overview of current baseline:

- The current baseline is the NPPF and existing WLLP policy GN3.3. The policy ensures that development does not result in unacceptable flood risk or drainage problems by requiring it to:
 - be located away from Flood Zones 2 and 3 (therefore concentrating on coastal and river sources);
 - where applicable, satisfy the sequential and exception test;
 - be supported by a Flood Risk Assessment (but in fewer circumstances than the preferred approach);
 - show that sustainable drainage systems have been explored; and 5) reduce surface water run-off.

Summary of Sustainability Appraisal:

- Option 1 would update existing policy to ensure that national guidance and practice is followed, and local evidence on flood risk is considered. Whilst the additional restrictions relating to Flood Risk Assessments and the safe disposal of surface water may have a negative impact on the provision of housing delivery across the borough, the positive impact of this policy approach on flood risk, water quality and land resources results in a sustainable approach to flood risk and water resources.
- Option 2 would seek to continue with the current WLLP policy and therefore would have a neutral effect compared to the existing baseline position.
- Option 3 would result in the relaxation of Flood Risk Assessment requirements for most smaller developments, and therefore whilst this will have a positive impact on housing delivery within the borough, because a greater number of smaller sites could come forward, the negative impact on flood risk and land resources results in a less sustainable option.
- **Overall, Option 1 is considered the most sustainable.**

EH04 – Contamination and pollution

Summary of options:

1. Continue WLLP approach but strengthen it with regard to health.
2. Have no specific policy on pollution and contamination.
3. Take a more relaxed approach to pollution and contamination in order to prioritise brownfield land development.

Overview of current baseline:

- WLLP Policy GN3.5 requires that proposals for development minimise the risk from all types of pollution and contamination and seek to remediate and restore contaminated land. This represents the current baseline position and aligns closely with Option 1.

Summary of Sustainability Appraisal:

- Option 1 seeks to continue with the current baseline, whilst also strengthening the approach towards health by presuming against new development that would result in exposure to 'unacceptable' levels of pollution or contamination. This would result in a stronger policy which seeks to direct development to the most sustainable locations and better protects the health and wellbeing of residents of the borough.
- Option 2 would have the most negative effects on the above objectives when compared to the current baseline. It would result in fewer restrictions on development/pollution/contamination which seek to protect the environment and population of West Lancashire and so is considered the least sustainable option.
- Option 3 would result in the relaxation of current policy (the baseline) but it is considered that it would not adequately protect the environment and population of the Borough.
- ***Overall, Option 1 is considered the most sustainable.***

EH05 – Air Quality

Summary of options:

1. General requirement for new development to minimise reductions in air quality and/or improve it where possible, and for sensitive uses to be sited away from sources of air pollution
2. No air quality policy

Overview of current baseline:

- WLLP Policy GN3.5 states proposals for development should 'be designed to minimise any reduction in air quality'. The NPPF states the planning system should actively manage patterns of growth and improve local environmental conditions to, amongst other things, improve air quality and public health. Option 1 aligns most closely with the current baseline position.

Summary of Sustainability Appraisal:

- Option 1 would deliver some positive improvements to air quality because it would introduce additional requirements for developments to seek opportunities to improve air quality, rather than just minimise any reduction in air quality.
- Option 2 would reduce the effectiveness of the current policy/baseline by removing air quality requirements and placing greater reliance on other policies to reference air quality and (indirectly) affect change.
- ***Overall, Option 1 is considered the most sustainable.***

EH06 – Green Infrastructure and Open Space (Approach 1)**Summary of options:**

1. An overarching Green Infrastructure (GI) policy would promote protecting and enhancing the GI network as well as promoting Active Design and the improvement of cycling and walking networks.
2. Update Adopted Local Plan Policy EN3: Provision of Green Infrastructure and Open Recreation Space to include criteria for development of open space to meet national advice.

Overview of current baseline:

- WLLP Policy EN3 is currently split into 2 parts; the first covers Green Infrastructure and the second, Open Space and Recreation Facilities. Option 2 would therefore most closely reflect the current baseline.

Summary of Sustainability Appraisal:

- Option 1 is considered to be the more sustainable option as it is considered to have a positive effect on a number of the objectives. The potential for a more detailed framework addressing open space and trees will allow for more flexibility in terms of creating sustainable development opportunities.
- Option 2 would update WLLP EN3 to meet national advice and requirements, so would deliver more positive effects when compared to the existing baseline.
- ***Overall, Option 1 is considered the most sustainable.***

EH06 – Green Infrastructure and Open Space (Approach 2)

Summary of options:

1. An Open Space, Sport, Leisure and Physical Activity policy.
2. Update existing Local Plan Policy EN3.
3. A separate built sports facilities policy.

Overview of current baseline:

- WLLP Policy EN3 is currently split into 2 parts; the first covers Green Infrastructure and the second, Open Space and Recreation Facilities. Option 2 would therefore most closely reflect the current baseline.

Summary of Sustainability Appraisal:

- Option 1 would cover the loss and provision of open space and built leisure facilities, providing a more detailed policy than the existing baseline, and so creating positive effects on a number of the objectives.
- Option 2 would seek to continue to follow the existing WLLP EN3 approach and therefore does not differ from the existing baseline position. It would therefore be expected to have a neutral effect on the objectives. However, aside other preferred approaches assessed here, it would be expected to result in quite a lengthy policy.
- Option 3 would separate Option 1 into two policies – one dealing with open space and the other with built sports facilities. A more holistic approach, considering both together, may be more sustainable.
- ***Overall, Option1 is considered the most sustainable.***

EH06 – Green Infrastructure and Open Space (Approach 3)

Summary of options:

1. Open Space and Residential Development. This approach would be a companion to preferred policy approach 2 (above) and would set out details regarding local open space standards for new residential development proposals and the financial costs for provision and maintenance of open space to support requirements for financial contributions.
2. A policy similar to option 1 but also requiring open space to be provided in connection with selected commercial developments.

Overview of current baseline:

- WLLP Policy EN3 is currently split into 2 parts; the first covers Green Infrastructure and the second, Open Space and Recreation Facilities. EN3.2(d) states that, where deficiencies exist, financial contributions towards public open space may be required but does not specify the costs involved, which are currently subject to a separate SPD. However, SPDs are no longer a suitable approach because the Local Plan should set out the costs to ensure that their viability has been appropriately considered as part of plan-making. Both approaches here are therefore a departure from the current position.

Summary of Sustainability Appraisal:

- Option 1 would seek to secure the provision of open space, or a financial contribution to open space for new residential developments. This is considered a more sustainable policy option than the existing baseline as it will plan positively for open space within the borough, ensuring that open space financial contributions are identified within the Local Plan, rather than a separate SPD.
- Option 2 would do the same as option 1 but would also include these requirements for some commercial developments. This could extend open space provision further than if it were just required for residential developments.
- ***Overall, option 1 and 2 are both considered to be equally sustainable, subject to viability evidence.***

EH06 – Green Infrastructure and Open Space (Approach 4)

Summary of options:

1. A Trees, Woodland, Hedgerows and Landscaping policy.
2. Part 3 of existing Adopted Local Plan Policy EN2: Preserving and Enhancing West Lancashire's Natural Environment.
3. Similar to the preferred approach with the addition of linkages to carbon offset and biodiversity net gain.

Overview of current baseline:

- WLLP Policy EN2 (3) sets out the current policy in respect of trees and landscaping. The NPPF details national policy which applies in the consideration of trees and new developments.

Summary of Sustainability Appraisal:

- Option 1 would seek to protect and enhance trees, woodlands and hedgerows in the Borough – providing significant benefits to health and wellbeing, addressing climate change, protecting landscape and improving biodiversity and air quality
- Option 2 would seek to continue to follow the existing WLLP approach and therefore would largely have a neutral effect on the existing baseline position.

- Option 3 would follow option 1 but also expressly address the potential for trees to provide carbon offset and enhance biodiversity. This is considered positive when compared to the baseline, but it would result in the doubling up of these requirements as there are other policies which will cover both biodiversity net gain and carbon offsetting.
- ***Overall, Option 1 is considered the most sustainable, although a hybrid with Option 3 may also be appropriate.***

EH07 – Healthy eating and drinking

Summary of options:

1. A healthy eating and drinking policy supported by a healthy eating and drinking Supplementary Planning Document (SPD).
2. No specific policy dealing with healthy eating and drinking as it is considered there is no need to address this matter in West Lancashire.
3. No specific policy dealing with healthy eating and drinking but dealing with these issues through [parts of] other policies in the Local Plan.
4. Similar to option 3, having no specific healthy eating and drinking policy, but covering these issues within other Local Plan policies, and, similar to Option 1, preparing a healthy eating and drinking SPD.

Overview of current baseline:

- There is no WLLP policy as such on healthy eating and drinking, nor any current SPD. NPPF Section 8 covers 'Promoting healthy and safe communities' and paragraph 91(c) advises that planning policies and decisions should enable and support healthy lifestyles, for example through access to healthier food.
- In terms of data, the baseline position is that there is a health issue relating to obesity in West Lancashire, although in very general terms, this is no worse than in other areas. There are 'hotspots' of poor health in West Lancashire (including health linked to diet, as well as lifestyle), tying in with general deprivation patterns in the Borough.

Summary of Sustainability Appraisal:

- Option 1 introduces a new policy on healthy eating and drinking, compared to no current Local Plan or SPD policy; as such it has a positive effect on sustainability in terms of encouraging healthy lifestyles, and possibly also in terms of reducing health inequalities, compared to the baseline. In all other aspects of the sustainability appraisal framework, this preferred policy approach has minimal or no effect.
- Option 2 proposes no policy, so is effectively the same as the baseline. It assumes there is no need to address these issues in West Lancashire; in that sense it is considered the least sustainable option as obesity / health inequalities are an issue in this Borough.

- Options 3 and 4 are very similar to Option 1 in terms of their effect compared to the baseline situation. They seek to address health issues through other Local Plan policies, rather than through a specific policy. Option 3 proposes no SPD to clarify and elaborate on policy and could be argued is marginally less sustainable than Option 4.
- ***As a Local Plan policy has more weight than an SPD policy, overall option 1 is considered the most sustainable, followed by Option 4.***

TRANSPORT AND INFRASTRUCTURE POLICIES

T101 – Transport network and access

Summary of options:

1. A policy that sets out specific transport schemes and supports the 20-minute neighbourhood concept.
2. To only list specific schemes that we know will be delivered.
3. To not list any specific schemes.

Overview of current baseline:

- WLLP Policy IF2 sets out a number of transport schemes which the Council would support the delivery of. Aside this, the West Lancashire Highways and Transport Masterplan (LCC) lists a number of transport projects which are of importance in delivering Local Plan objectives. Option 1 is most closely aligned to the current policy approach (baseline), but with additional support lent to the concept of the 20-minute neighbourhood.

Summary of Sustainability Appraisal:

- Option 1 would have a positive effect on the majority of the objectives when considered against the baseline. This option would provide a list of desired schemes and would support walking and cycling linkages within the borough.
- Option 2 would result in the omission of some 'ambitious' schemes, such as the Ormskirk bypass and the Skelmersdale rail link, as there is currently no certainty that they will go ahead. Whilst this approach has a positive effect on a number of objectives, this is not the most sustainable of the policy options because of the lack of direction and support this proffers.
- Option 3 would not list any schemes within the policy and so would be unlikely to help positively plan for the growth of the borough. This has a negative effect on a number of the objectives and therefore is the least sustainable of all the above options.
- ***Overall, Option 1 is considered the considered the most sustainable.***

T102 – Parking standards and Electric vehicle charging points

Summary of options:

1. Continue the current policy approach (Adopted Local Plan Policy IF2 parts 2 and 3).
2. A more restrictive policy to limit car parking spaces in new developments.
3. A policy that does not restrict car parking space i.e. the standards set out in the policy would be a minimum.

4. Do not require Electric Vehicle Charging Points.

Overview of current baseline:

- The baseline position is represented by the adopted Local Plan and the NPPF. WLLP Policy IF2 (parts 2 and 3) deal with parking standards for residential developments and electric vehicle charging points, respectively, with parking standards for other uses being set out at Appendix F. The NPPF primarily sets out what a local plan should do in relation to setting local parking standards (paragraph 105) and what planning applications should be required to do (paragraph 110). Option 1 therefore represents the baseline position.

Summary of Sustainability Appraisal:

- Option 1 is the same as the baseline position so would have a neutral effect in terms of sustainability.
- Option 2 could have a negative effect upon the local economy and employment topic but a positive effect upon the land resources topic. It may also have uncertain positive effects upon the transport, climate change, air quality and local services and community infrastructure topics with this uncertainty being a result of more restricted parking discouraging the use of private vehicles.
- Option 3, by not restricting car parking, would have negative effects upon several topics (transport, land resources, climate change, air quality and local services and community infrastructure) whilst only being offset by a positive effect upon the local economy and employment topic.
- Option 4 would have negative effects upon the transport, air quality and climate change topics and is inferior to the current policy represented by option 1. The NPPF does not compensate for the removal of the adopted Local Plan requirement for Electric Vehicle Charging Points as it only indicates that development should be designed to enable charging of plug-in vehicles.
- ***Overall, options 1 or 2 are considered to be the most sustainable.***

TI03 – Digital Connectivity

Summary of options:

1. A flexible policy that governs communications and digital connectivity. This would support the NPPF, which sets most guidance for communications development.
2. No policy, and instead rely on national planning policy (NPPF).
3. A high level of control, for example by requiring new development to go beyond Part R1 of the Building Regulations 2010.

Overview of current baseline:

- The baseline comprises Local Plan Policy IF3: Service Accessibility and Infrastructure for Growth along with section 10 (Supporting high quality communications) of the NPPF and Part R1 of the Building Regulations. Policy IF3 contains limited references to

communications and digital connectivity, comprising a requirement for development to provide essential site communications infrastructure and outlining support for the delivery of broadband and communications technology. NPPF provides greater detail, including in relation to minimising the number of masts and what should not be expected from local authorities in terms of limiting the siting of digital communications. It also details the supporting evidence required for applications. The current baseline position therefore most closely aligns with option 2, supported by some limited Local Plan policy.

Summary of Sustainability Appraisal:

- Option 1 introduces a new policy on digital connectivity in new developments, compared to minimal current Local Plan policy but with National Planning Policy Framework paragraphs 112-116 and Building Regulations standards on the matter. The positive sentiments of the option 1 result in small positive effects on sustainability in terms of the local economy and employment and local services and community infrastructure topics.
- Option 2 is closest to the baseline position so would have a neutral effect in terms of sustainability, with little or no effect compared to the current baseline situation.
- Option 3 would introduce a high level of control which would have a mixed effect in sustainability terms with a small positive effect upon the cultural landscape and heritage topic but potentially negative effects upon other areas due to its inflexibility and prescriptivism.
- ***Overall, Option 1 would be the most sustainable.***

T104 – Low carbon and renewable energy

Summary of options:

1. Designate specific areas of opportunity for low carbon and renewable energy ('LCRE').
2. Do not allocate any areas for low carbon and renewable energy to enable a flexible response to schemes.
3. Require all new developments to provide renewable energy – e.g. solar panels on commercial buildings and new dwellings.

Overview of current baseline:

- The baseline position comprises adopted Local Plan Policy EN1: Low Carbon Development and Energy Infrastructure, the National Planning Policy Framework (paragraphs 155 and 158 in particular), National Planning Practice Guidance and Building Regulations Approved Document L (Conservation of Fuel and Power). It should be noted that some measures identified by adopted Local Plan Policy EN1 have ceased nationally, including the Code for Sustainable Homes and 'Allowable Solutions', the latter of which gave developers an economical way of compensating for the CO2 emission reductions that were difficult to achieve through normal design and construction. As such, the baseline position is broadly reflected by option 2.

Summary of Sustainability Appraisal

- Option 1 advances the existing baseline position by proactively designating the most appropriate areas of the Borough for wind and solar energy schemes. This would have positive effects in terms of sustainability in relation to the cultural heritage and landscape, climate change / climate emergency, energy and flooding, air quality and local economy and employment topics. In addition, there would be uncertain positive, or negative, effects in relation to land resources.
- Option 2 would have neutral effects in terms of sustainability as it closely resembles the baseline position.
- Option 3 would also have overall positive effects in terms of sustainability; with positive effects relating to the climate change / climate emergency, energy and flooding and air quality topics but would have uncertain negative effects in relation to cultural heritage and landscape.
- ***Overall, option 1 would therefore be the most sustainable; however, option 3 would also have merit compared to the baseline situation. It should be noted that options 1 and 3 are not mutually exclusive and, if appropriate, it may be possible to combine them into a single future policy.***

T105 – Energy efficiency in new developments

Summary of options:

1. Require 'major' developments, and encourage other 'minor' developments, to deliver energy efficiency improvements above national standards, considering energy efficiency in scheme design.
Developers should also be required to monitor energy efficiency improvements in their developments, to evaluate and improve performance to ultimately achieve zero net carbon goals.
2. Require both major and minor residential and commercial developments to demonstrate how they have considered energy efficiency in their design, as a minimum in line with any national standards.
3. Require major, but not minor, developments to demonstrate how they have considered energy efficiency in their design, as a minimum in line with, and / or above, any national standards.
4. Have no requirements for energy efficiency in new buildings and allow developers to provide energy efficiency improvements in accordance with national building regulations only.
5. (Part variation): Do not require developers to monitor and evaluate energy efficiency performance.

Overview of current baseline:

- National policy is set out in the NPPF but does not refer to 'energy efficiency' as such. Other national standards are set out in Part L of Building Regulations (conservation of fuel and power) and through the Future Homes Standard. The current adopted WLLP has a policy (EN1) on low carbon development and energy infrastructure, tying in with Part L of Building Regulations as a minimum, also referring to the Code for Sustainable Homes (now rescinded). Policy EN1 also has a requirement for an Energy Statement setting out how improvements are achieved.

Summary of Sustainability Appraisal:

- Options 1-3 have few significant differences compared to the baseline, given the baseline policy position set out in the WLLP is similar in requiring meeting Building Regulations as a minimum. The positive effects relative to the baseline (under the topic areas of the climate emergency and air quality) are the most marked for Option 1 as this requires energy efficiency improvements above national standards for major development and encourages them for minor development.
- For Options 2 and 3, the positive effects compared to the baseline are less marked as Option 2 only requires energy efficiency in line with national standards, and Option 3 only applies to major developments, and could be either in line with, or above, national standards.
- Option 4 has negative effects compared to the baseline for the topic areas of the climate emergency, and air quality, given its lack of local plan requirements to exceed national standards. (The baseline encourages going above national standards, or at least anticipates national standards increasing over time.)
- Option 5 is considered only to have minor effects compared to the baseline for the above two topic areas, as it is not guaranteed that a lack of monitoring and evaluation would actually result in lower energy efficiency standards, or if it did, these would not be expected to be significant.
- ***Overall, Option 1 is considered to be the most sustainable, followed by Option 3.***

T106 – Water efficiency in new residential developments**Summary of options:**

1. To introduce tighter, local restrictions, above that of the minimum optional Building Regulation standards, to improve water efficiency in new residential developments.
2. Do not have a policy; rely instead on Building Regulations to deliver water efficiency.

Overview of current baseline:

- There is no WLLP policy dealing with water efficiency in new developments, nor any current SPD. There are no explicit references to water efficiency in the NPPF but there are more general references to water management and that local plan policies should

support measures to ensure the future resilience of communities and infrastructure to climate change impacts. NPPG (Housing: optional technical standards) indicates how a tighter water efficiency standard may be required in new dwellings. Building Regulations Approved Document G provides guidance on the supply of water to a property, including water efficiency i.e. an easily accessible water supply that doesn't incur wastage. This relates to the use of fittings in relation to water consumption, e.g. for a toilet, and is optional. However, there is an overall mandatory national requirement for all new homes to meet the usage standard set out in Building Regulations of 125 litres/person/day. Option 2 therefore represents the baseline position.

Summary of Sustainability Appraisal:

- Option 1 introduces a new policy on water efficiency in new developments, compared to no current Local Plan policy and optional Building Regulations standards on the matter. As such it has a positive effect on sustainability in terms of helping to improve resilience to the likely effects of climate change by improving water efficiencies and so reducing demand on the water supply and, to some extent, reducing the amount of wastewater generated by development. In all other aspects of the sustainability appraisal framework, this preferred option has little or no effect compared to the baseline situation.
- Option 2 proposes no policy, so is the same as the baseline. It assumes there is no need to expressly address the issue in West Lancashire; in that sense it is considered less sustainable than option 1.
- ***Overall, Option 1 is the most sustainable. Using water resources more efficiently is a global issue that policy at the local level can contribute towards.***

OTHER POLICIES

OT01 – Sequential tests

Summary of options:

1. A Sequential Test Policy comprising retail and other town centre uses on sites outside centres and proposals at risk from flooding. This is about guiding new town centre uses to town centres as a first priority, then edge of town centre sites and finally out of centre locations that are accessible. In relation to flood risk, it entails guiding new development towards sites at less risk of flooding from all sources
2. To not have a Local Plan sequential test policy and rely on national planning advice instead
3. Setting out the approach to undertaking a sequential test, as outlined by option 1, in separate town centre and flood risk policies
4. Existing Local Plan Policy GN5: Sequential Tests. This relates to retail and other town centre uses on sites outside centres; proposals at risk from flooding; affordable housing, employment uses and community facilities on Protected Land; affordable Housing or Gypsy and Traveller sites in the Green Belt; and accommodation for temporary agricultural / horticultural workers

Overview of current baseline:

- There is an existing WLLP policy on sequential tests (Policy GN5) as well as the matter being covered by the National Planning Policy Framework sections 7 (Ensuring the vitality of town centres) and 14 (Meeting the challenge of climate change, flooding and coastal change) and supported by National Planning Practice Guidance. This is the baseline situation and represents option 4.

Summary of Sustainability Appraisal

- Options 1, 2 and 3 differ in composition compared to the baseline, but all would be equally sustainable as the baseline position because all also have neutral effects in terms of sustainability. This is because the policy approach simply gives clarity relating to technical matters of how to undertake a satisfactory sequential test. Therefore, this deals with the quality of the test i.e. how to do it. Other local plan policies detail additional uses of relevance and circumstances (other than town centre uses and flood risk which are covered by national advice) and the sequence to be followed in establishing site / a proposal's suitability for those uses. What other uses that are listed in the sequential test as alternative policy approaches is therefore irrelevant in varying the assessment of them in terms of sustainability.
- Option 4 follows the current local plan policy approach in West Lancashire and, along with national planning advice, this represents the baseline; as such it has a neutral effect in terms of sustainability.
- ***As such, all options 1-4 are equally sustainable and the choice of option would be determined by other matters e.g. option 3 unduly repeats policy.***

OT02 – Viability

Summary of options:

1. A general 'hierarchy of viability', reflecting the priorities of the Local Plan, and 'ranking' the desirable outcomes that should be achieved (e.g. Affordable housing, biodiversity net gain, infrastructure). The policy would also include criteria for demonstrating viability (e.g. marketing)
2. Have a very rigid policy that only allows the set 'hierarchy' to be followed with no variation from it. The approach for demonstrating viability (e.g. marketing) would also be stricter than under current policy GN4.
3. Have a more relaxed policy that essentially allows applicants to choose the desirable outcomes they want with very few or even no criteria to be satisfied. The approach for demonstrating viability (e.g. marketing) would be less strict than under current policy GN4.

Overview of current baseline:

- WLLP Policy GN4 takes a flexible approach, to allow some deviation from policy where it can be demonstrated that a use is no longer viable and marketing evidence shows there is no demand for that use. The importance of viability repeats itself through the NPPF, and further guidance can be found in the MHCLG Guidance Note on Viability. Option 1 is most closely aligned to the existing baseline, but includes additional requirements relating to a viability hierarchy.

Summary of Sustainability Appraisal:

- Option 1 is considered the most sustainable option, maintaining the current policy GN4, but with an added approach to 'rank' the desirable outcomes that should be achieved through new development, based on viability evidence. Option 1 promotes the greatest flexibility in approach, balancing viability considerations with achieving the greatest 'knock-on' benefits possible, via a hierarchy, informed by evidence.
- Option 2 would introduce a stricter policy than the current baseline position. At this stage, without the viability evidence, the level of impact on sustainability cannot truly be known – in theory it could help greater support delivery of benefits, but a higher number of requirements could also mean developments / benefits may ultimately not be delivered as they could be rendered unviable.
- Option 3 would introduce a weaker policy than the current baseline position. It would be expected that applicants would choose to deliver very few, or no, requirements meaning that few benefits would be delivered, and/or there would be less control in ensuring that the 'higher priority' items are delivered.
- **Overall, Option 1 is considered the most sustainable.**

OT03 – Developer Contributions

Summary of options:

1. To follow the current local plan policy approach of requiring certain developments to provide a development contribution towards funding or delivering new infrastructure requirements.
2. To not have a policy requiring developer contributions.

Overview of current baseline:

- There is an existing WLLP policy on developer contributions (Policy IF4) and the Community Infrastructure Levy (CIL) is operative in West Lancashire. There is also an SPD (Provision of Public Open Space in New Residential Developments) dealing with planning obligations (Section 106 legal agreements) and NPPF Section 4 covers 'Planning conditions and obligations' including setting out the 3 tests for when obligations may be sought. This is the baseline situation and represents option 1.
- The baseline position allows the local authority to raise CIL funds from developers who are undertaking new building projects in the area and the money can be used to pay for a wide range of infrastructure that is needed to support new development. Planning obligations can be used where they are necessary to make a proposed development acceptable.

Summary of Sustainability Appraisal:

- Option 1 follows the current local plan policy approach in West Lancashire of requiring certain developments to provide a development contribution towards funding or delivering new infrastructure requirements. As this represents the baseline, it has a neutral effect in terms of sustainability.
- Option 2 (to not have a policy requiring developer contributions) would still enable both the Community Infrastructure Levy and planning obligations to be used to deliver infrastructure and affordable housing, but it is slightly less sustainable in relation to the population, health and social inclusion and the local services and community infrastructure topics.
- ***Therefore Option 1, whilst neutral, is the more sustainable of the two.***

4. What Happens Next?

- 4.1.1 Having read this SA report, the Council is inviting you to comment on its content (and also the content of the Appendices, if necessary). The easiest way to do this is online at www.westlancs.gov.uk/lp2040, where you will find instructions on how to comment.
- 4.1.2 All the Issues & Options consultation papers (including this SA report), as well as further details of how to engage with the consultation, are also available at all libraries in West Lancashire, at the Council Offices, 52 Derby Street, Ormskirk, L39 2DF and at the Customer Service Point, Unit 142, first floor of The Concourse, Skelmersdale, WN8 6LN.
- 4.1.3 You can also phone the Council if you have any queries about the Local Plan Issues and Options Consultation to speak to a Council Officer on 01695 585194.

Next Steps

- 4.1.4 With regard to the wider process for preparing the Local Plan, the Council will consider the feedback received from this 'Regulation 18, Issues and Options' consultation and use it in preparing the next stages of the Local Plan. Further SAs will be undertaken at each stage of the Local Plan.

APPENDIX 1 SUSTAINABILITY APPRAISAL OBJECTIVES AND SUB-CRITERIA

POPULATION, HEALTH AND SOCIAL INCLUSION

Objective 1: To cater for the needs of an ageing population.

Objective 2: To reduce Borough-wide inequalities with regard to learning, skills, educational attainment, and employability.

Objective 3: To improve health and well-being and reduce inequalities

- Will the plan / policy facilitate the provision of accommodation suitable for (designed or adaptable for) the elderly?
- Will the plan / policy facilitate the provision of infrastructure / services for the elderly?
- Will the plan / policy make it easier for the elderly to find appropriate employment or activities in which to participate?
- Will the plan / policy increase the levels of participation and attainment in education?
- Will the plan / policy address skills gaps and enable skills progression?
- Will the plan / policy help develop the Borough's knowledge base?
- Will the plan / policy improve people's chances of success in applying for jobs?
- Will the plan / policy improve economic, environmental and social conditions (quality of life) in deprived areas and for deprived groups?
- Will the plan / policy reduce isolation in the community?
- Will the plan / policy reduce levels of crime and / or the fear of crime?
- Will the plan / policy reduce health inequalities?
- Will the plan / policy provide opportunities to protect or enhance areas of public open and recreational space, and Green Infrastructure, so to support opportunities for physical and mental health improvement?
- Will the plan / policy facilitate or encourage healthier lifestyles? Will the plan / policy improve the quantity and quality of, and access to, areas of open and recreational space, and to Green Infrastructure in general?
- Will the plan / policy increase opportunities for active travel (cycling/walking)?

HOUSING

Objective 7. To seek to meet the housing needs of all sections of society.

- Will the plan / policy provide for an appropriate mix of housing to meet all needs including affordable housing and / or housing for the elderly?
- Will the plan / policy support the creation of sustainable settlements with an appropriate balance of residents?
- Will the plan / policy support the provision of 'non-mainstream' housing e.g. gypsy and traveller sites, other caravan dwellers, houseboats, student accommodation?

LOCAL ECONOMY AND EMPLOYMENT

Objective 4: To reduce economic inactivity and disparities in employment.

Objective 5. To encourage sustainable economic growth.

Objective 6. To facilitate diversification of the rural economy.

- Will the plan / policy provide job opportunities in all areas, including most needy areas?
- Will the plan / policy encourage business start-ups, especially from under-represented groups?
- Will the plan / policy provide a broad range of jobs and employment opportunities?
- Will the plan / policy provide higher skilled jobs?
- Will the plan / policy improve accessibility to jobs via the location of employment sites?
- Will the plan / policy help attract workers, residents, businesses and / or investors to the Borough?
- Will the plan / policy improve the range of sustainable employment sites?
- Will the plan / policy promote growth in the key sectors of the Borough's economy?
- Will the plan / policy enable the Borough to take advantage of major investment nearby?
- Will the plan / policy deliver regeneration to / promote the economic growth of urban areas and the vitality / viability of town centres?
- Will the plan / policy increase the economic benefit derived from the Borough's natural environment?
- Will the plan / policy support sustainable rural diversification?
- Will the plan / policy encourage and support the growth of sustainable rural businesses?
- Will the plan / policy retain or promote access to and provision of services in rural areas?
- Will the plan / policy promote the sustainable economic growth of villages and smaller settlements?

TRANSPORT

Objective 8. To contribute towards an efficient, equitable, safe, and environmentally 'sustainable' transport system / network.

- Will the plan / policy improve the efficiency of the transport network?
- Will the plan / policy help reduce vehicular traffic and congestion?
- Will the plan / policy increase access to and opportunities for walking, cycling ('active travel') and use of public transport?
- Will the plan / policy reduce the number of people killed or seriously injured on the roads?
- Will the plan / policy reduce or minimise emissions of greenhouse gases?
- Will the plan / policy help improve air quality?
- Will the plan / policy promote the use of locally produced or sourced goods and materials?

LAND RESOURCES

Objective 9. To preserve and enhance the Borough's land resources.

- Will the plan / policy reduce the amount of vacant, derelict, and contaminated land?
- Will the plan / policy encourage the use of brownfield land in preference to greenfield land?
- Will the plan / policy minimise or reduce the loss of high quality (best and most versatile) agricultural land and / or soil in general?
- Will the plan / policy achieve the efficient use of land via appropriate density of development?
- Will the plan / policy reduce the amount of waste generated by development?
- Will the plan / policy promote the use of recycled, reclaimed and secondary materials?

CULTURAL HERITAGE AND LANDSCAPE

Objective 10. To conserve, and, where possible, enhance, and to recognise the added value of, the built and cultural heritage and environment of the Borough.

- Will the plan / policy improve the quality of the built and historic environment?
- Will the plan / policy support the conservation and enhancement of high quality built, natural and historic environments within the Borough (whether designated or not)?
- Will the plan / policy protect and enhance the character and appearance of the Borough's landscape, strengthening local distinctiveness and sense of place?
- Will the plan / policy improve access to / understanding of buildings and other assets of historic and cultural value?

CLIMATE CHANGE / CLIMATE EMERGENCY, ENERGY AND FLOODING

Objective 11. To minimise contributions towards, and mitigate and be resilient to the impacts of climate change, and protect against flood risk.

- Will the plan / policy minimise the need for carbon-based energy generation / use?
- Will the plan / policy maximise the production / deployment of renewable energy?
- Will the plan / policy encourage new developments to achieve zero carbon?
- Will the plan / policy help reduce or manage flood risk?
- Will the plan / policy help improve resilience to the likely effects of climate change?

WATER QUALITY AND RESOURCES

Objective 12. To protect ‘water assets’ and ensure an adequate supply of water and means of disposing of wastewater

- Will the plan / policy help improve the quality of water resources in the area?
- Will the plan / policy maintain / enhance ground water (incl. aquifer) quality?
- Will the plan / policy help, or minimise effects upon, water supply?
- Will the plan / policy minimise / reduce the amount of wastewater generated by development?

AIR QUALITY

Objective 8. To contribute towards an efficient, equitable, safe, and environmentally ‘sustainable’ transport system / network.

- Will the plan / policy help reduce vehicular traffic and congestion (in so far as it relates to air quality)?
- Will the plan / policy reduce or minimise emissions of greenhouse gases?
- Will the plan / policy help improve air quality?

BIODIVERSITY

Objective 13. To protect, maintain and enhance the biodiversity assets of the Borough.

- Will the plan / policy protect and / or enhance the biodiversity or geodiversity of the Borough?
- Will the plan / policy protect and / or enhance habitats, species and damaged sites?
- Will the plan / policy provide opportunities for new habitat creation?
- Will the plan / policy protect and / or extend habitat connectivity and landscape permeability, suitable for species migration?

LOCAL SERVICES AND COMMUNITY INFRASTRUCTURE

Objective 3: To improve health and well-being and reduce inequalities

Objective 8. To contribute towards an efficient, equitable, safe, and environmentally ‘sustainable’ transport system / network.

- Will the plan / policy reduce isolation in the community?
- Will the plan / policy facilitate or encourage healthier lifestyles?
- Will the plan / policy reduce health inequalities?
- Will the plan / policy improve the quantity and quality of, and access to, areas of open and recreational space, and to Green Infrastructure in general?
- Will the plan / policy improve the efficiency of the transport network?
- Will the plan / policy increase access to and opportunities for walking, cycling (‘active travel’) and use of public transport?

APPENDIX 2 SUSTAINABILITY APPRAISALS OF INDIVIDUAL POLICIES AND THEIR ALTERNATIVES

- **Strategic Policies**

- ST01 - Sustainable Development
- *ST02a - Housing requirements**
- *ST02b - Employment land requirements**
- *ST02c - Spatial Distribution**
- ST03 - Climate change & env. sustainability
- ST04 - Settlement boundaries
- *ST05 - Strategic sites**

- **Housing and Communities**

- HC01a – Where housing can be located
- HC01bi – Brownfield & greenfield development
- HC01bii – Density
- HC01c – Dwelling sizes
- HC01d – Affordable housing
- HC01e – Housing for older people
- HC01f – Custom and self-build housing
- HC01g – Accommodation for students
- HC01h – Caravan and houseboat dwellers
- HC01i – Gypsies & Travellers and Travelling Showpeople
- HC01j – Temporary agricultural workers' accommodation
- HC02 – Place-making
- HC03 – Heritage
- HC04 – Community Facilities

- **Economy and Employment**

- EE01 – Employment Areas
- EE02 – Rural economy

- EE03 – Town Centres
- EE04a – Education / Edge Hill University
- EE04b – Education / Skills and training

- **Environment and Health**

- EH01 – Preserving and enhancing nature & biodiversity
- EC02 – Landscape and land resources
- EH03 – Flood risk and water resources
- EH04 – Contamination and pollution
- EH05 – Air quality
- EH06 – Green infrastructure and open spaces (*4 approaches*)
- EH07 – Healthy eating and drinking

- **Transport and Infrastructure**

- TI01 – Transport network and access
- TI02 – Parking standards & electric vehicle charging points
- TI03 – Digital connectivity
- TI04 – Low carbon and renewable energy
- TI05 – Energy efficiency in new developments
- TI06 – Water efficiency in new residential developments

- **Other**

- OT01 – Sequential tests
- OT02 – Viability
- OT03 – Developer contributions

** No assessments provided at this stage for these policies*

STRATEGIC POLICIES / ST01 – Delivering Sustainable Development

- Summary of ‘options’:**
1. **‘Standard’ settlement hierarchy and NPPF presumption** – this sets out a settlement hierarchy based on the findings of the West Lancashire Sustainable Settlement Study 2021, essentially the same as the ‘baseline’ hierarchy (summarised below). Most new development would be directed to the settlements at or towards the top of the hierarchy, as these tend to be the most sustainable locations for new development. The policy would also include the NPPF ‘presumption in favour of sustainable development’ as this is at the centre of national planning policy and is required to play a key role in local plans.
 2. **Variation to settlement hierarchy** – this alternative option varies the settlement hierarchy from the 2021 Study, putting some settlements with fewer services towards the top levels of the hierarchy, and some settlements with more services lower in the hierarchy.

Overview of current baseline: The current WLLP has a settlement hierarchy based on a previous version of the West Lancashire Sustainable Settlement Study, with Skelmersdale with Up Holland, Ormskirk with Aughton, and Burscough at the top, then Key Sustainable Villages (Tarleton with Hesketh Bank, Parbold, Banks), Rural Sustainable Villages, and Small Rural Villages at the bottom.

The main differences between the WLLP settlement hierarchy and the 2021 Sustainable Settlement Study is that Ormskirk is in the top tier (previously second), Tarleton is in the second tier (previously third), and Banks in the fourth tier (previously third).

Topic	Option 1	Option 2
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences in the amount of development going to two or three settlements (more in Tarleton, less in Banks). Overall, it would be expected that there would be no, or insignificant, effects relative to the baseline position, although there could be minor positive effects (e.g. a chance of more accommodation for the elderly, or improved local job prospects) for settlements with more development, and minor negative effects for settlements with less development than under the baseline position. The likelihood of these effects will be determined primarily by policy ST02 (distribution of development) rather than by this policy, so the overall effect is recorded as neutral above, similarly for the other topic areas under this option.</p>	<p style="text-align: center;">-</p> <p>The settlement hierarchy as set out in the West Lancashire Sustainable Settlement Study 2021 is based on the 'sustainability' of each settlement in the Borough – number, and ease of access to, services and facilities, also taking into account interlinkages between nearby settlements. To vary the settlement hierarchy so that some settlements with fewer services were higher in the hierarchy, and some settlements with more services were lower, would most likely result in more development in the less sustainable settlements compared to the baseline position. Therefore, overall, it would be expected that the effects under this topic area (and all other topic areas) would be negative relative to the baseline.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences – please see comments above for an explanation.</p>	<p style="text-align: center;">-</p> <p>Whilst overall numbers of dwellings may be the same, distributing housing to less sustainable settlements will most likely have a negative effect compared to the baseline in terms of the creation of sustainable settlements.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences – please see comments above for an explanation.</p>	<p style="text-align: center;">-</p> <p>As per the 'Population, Health and Social Inclusion' topic area, to use a settlement hierarchy that does not correspond to the 'sustainability' of each settlement (in terms of numbers of, and access to, services and facilities) would lead to negative effects relative to the baseline.</p>

Topic	Option 1	Option 2
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences – please see comments above for an explanation.</p>	<p style="text-align: center;">-</p> <p>This option would most likely lead to negative effects relative to the baseline – please see comments above (Topic Area 1) for an explanation.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences – please see comments above for an explanation.</p>	<p style="text-align: center;">0 / ?</p> <p>The effects of this option relative to the baseline are likely to be insignificant. Their exact nature depends exactly where development would be located.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences – please see comments above for an explanation.</p>	<p style="text-align: center;">?</p> <p>The effects of this option relative to the baseline depend exactly where development would be located. Whilst one settlement may be more sustainable than another in terms of services, this may not necessarily be the case in terms of landscape and cultural heritage.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences – please see comments above for an explanation.</p>	<p style="text-align: center;">0 / ?</p> <p>The effects of this option relative to the baseline are likely to be insignificant. Their exact nature depends where development would be located. There would be a similar level of development overall.</p>

Topic	Option 1	Option 2
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences – please see comments above for an explanation.</p>	<p style="text-align: center;">0 / ?</p> <p>The effects of this option relative to the baseline are likely to be insignificant. Their exact nature depends where development would be located. There would be a similar level of development overall.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences – please see comments above for an explanation.</p>	<p style="text-align: center;">-</p> <p>This option would most likely lead to negative effects relative to the baseline as people are likely to need to travel further overall, adding to air pollution. Please also see comments above (Topic Area 1) for an explanation.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences – please see comments above for an explanation.</p>	<p style="text-align: center;">0 / ?</p> <p>The effects of this option relative to the baseline are likely to be insignificant. Their exact nature depends where development would be located. Whilst one settlement may be more sustainable than another in terms of services, this is not necessarily the case in terms of biodiversity value.</p>

Topic	Option 1	Option 2
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position, although with the potential for minor differences – please see comments above for an explanation.</p>	<p style="text-align: center;">-</p> <p>This option would most likely lead to negative effects relative to the baseline as more people are likely to be living in places with relatively fewer services, and therefore less good access to services overall.</p>

Summary

Option 1 is very similar to the baseline position. Overall, it would be expected that there would be no, or insignificant, effects relative to the baseline position, and whilst there could be minor positive or negative effects, the likelihood of these effects will be determined primarily by policy ST02 (distribution of development) rather than by this policy, so the overall effect is considered to be neutral relative to the baseline.

Option 2 uses a settlement hierarchy that departs from the findings of the Sustainable Settlement Study and is most likely to have negative effects under a number of Topic Areas relative to the baseline on account of less good links to services and facilities.

Overall, Option 1 is considered the more sustainable.

STRATEGIC POLICIES / ST03 – Climate Change and Environmental Sustainability

- Summary of ‘options’:**
1. A new strategic policy. This approach would see the introduction of a new strategic policy governing climate change and environmental sustainability, in response to the climate emergency declaration made by the Council. It would support ambitions to achieve net zero by embedding such climate and environmental sustainability considerations at the heart of all development proposals.
 2. Have no strategic policy. This approach would be similar to the current Local Plan, and would have no strategic policy governing climate change and environmental sustainability.
 3. Introduce a more prescriptive policy. This approach would set detailed requirements through the strategic policy.

Overview of current baseline: The baseline position comprises a range of adopted Local Plan Policies, the National Planning Policy Framework, National Planning Practice Guidance, Building Regulations Approved Document L (Conservation of Fuel and Power) and national legislation e.g. the Climate Change Act 2008. Relevant adopted Local Plan policies are: GN3: Criteria for Sustainable Development, IF2: Enhancing Sustainable Transport Choice, EN2: Preserving and Enhancing West Lancashire's Natural Environment, EN3: Provision of Green Infrastructure and Open Recreation Space and EN1: Low Carbon Development and Energy Infrastructure.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0 / +</p> <p>As a strategic policy, this option would have minimal effect (slightly positive) in relation to this topic as it would closely reflect the baseline position. Whilst the following matters relating to this topic are of relevance, they are unlikely to be addressed in more detail than existing policy by a strategic policy:</p> <ol style="list-style-type: none"> 1. Providing opportunities to protect or enhance areas of public open and recreational space, and Green Infrastructure, so to support opportunities for physical and mental health improvement. 2. Facilitating or encouraging healthier lifestyles and improving the quantity and quality of, and access to, areas of open and recreational space, and to Green Infrastructure in general. 3. Increase opportunities for active travel (cycling/walking). 	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. A detailed prescriptive policy may increase opportunities for active travel (cycling/walking). Existing policy is likely to address the following matters to the same level of detail:</p> <ol style="list-style-type: none"> 1. Providing opportunities to protect or enhance areas of public open and recreational space, and Green Infrastructure, so to support opportunities for physical and mental health improvement 2. Facilitating or encouraging healthier lifestyles? Will the plan / policy improve the quantity and quality of, and access to, areas of open and recreational space, and to Green Infrastructure in general.
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. There should be opportunities to increase the economic benefit derived from the Borough's natural environment compared to existing policy.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. There should be opportunities to increase the economic benefit derived from the Borough's natural environment compared to existing policy.</p>
Transport (Objective 8)	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. A strategic policy should help to reduce or minimise emissions of greenhouse gases and therefore help improve air quality. It is less likely to help reduce vehicular traffic and congestion or increase access to and opportunities for walking, cycling ('active travel') and use of public transport compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+</p> <p>This option would have a positive effect in relation to this topic compared to the baseline. A detailed prescriptive policy may increase access to and opportunities for walking, cycling ('active travel') and use of public transport and should help to reduce or minimise emissions of greenhouse gases and therefore help improve air quality.</p>

Topic	Option 1	Option 2	Option 3
Land Resources (Objective 9)	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. By seeking to improve energy and water efficiencies in new buildings it should assist in reducing the amount of waste generated by development.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. By seeking to improve energy and water efficiencies in new buildings it should assist in reducing the amount of waste generated by development.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. A strategic policy could set a framework to minimise the need for carbon-based energy generation / use maximise the production / deployment of renewable energy and encourage new developments to achieve zero carbon. Flood risk and resilience to climate change are addressed by other policy documents that form part of the baseline; indeed the option would have presented more favourably except for the existing baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+</p> <p>This option would have a positive effect in relation to this topic compared to the baseline. A detailed prescriptive policy could set a framework to minimise the need for carbon-based energy generation / use maximise the production / deployment of renewable energy and encourage new developments to achieve zero carbon. Flood risk and resilience to climate change are addressed by other policy documents that form part of the baseline; indeed the option would have presented more favourably except for the existing baseline.</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>As a strategic policy, this option would have minimal effect in relation to this topic as it would closely reflect the baseline position. A strategic policy is unlikely to address the following in more detail than existing policy:</p> <ol style="list-style-type: none"> 1. Minimising effects upon, water supply. 2. Minimising / reducing the amount of wastewater generated by development. 	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. A detailed prescriptive policy could help to minimise effects upon, water supply and could help to minimise / reduce the amount of wastewater generated by development.</p>
Air quality (Objective 8)	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. A strategic policy should help to reduce or minimise emissions of greenhouse gases and therefore help improve air quality.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+</p> <p>This option would have a positive effect in relation to this topic compared to the baseline. A detailed prescriptive policy will help to reduce or minimise emissions of greenhouse gases and therefore help improve air quality.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. The inclusion of a requirement in relation to biodiversity net gain (BNG) should protect and / or enhance the biodiversity of the Borough and provide opportunities for new habitat creation. BNG is not presently a legal requirement of development and does not therefore currently represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic compared to the baseline. The inclusion of a requirement in relation to BNG should protect and / or enhance the biodiversity of the Borough and provide opportunities for new habitat creation. BNG is not presently a legal requirement of development and does not therefore currently represent the baseline position.</p>

Topic	Option 1	Option 2	Option 3
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>As a strategic policy, this option would have minimal effect in relation to this topic as it would closely reflect the baseline position. Whilst several matters relating to this topic are of relevance, they are unlikely to be addressed in more detail than existing policy by a strategic policy.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+ / 0</p> <p>This option would have a positive effect in relation to this topic compared to the baseline. A detailed prescriptive policy may increase access to and opportunities for walking, cycling ('active travel') and use of public transport.</p>

Summary

Option 1 would have positive small positive effects in sustainability terms in relation to 6 topics (local economy and employment, transport, land resources, climate change / the climate emergency, energy and flooding, air quality and biodiversity).

Option 2 has neutral effects in terms of sustainability because it represents the baseline position.

Option 3 would have positive sustainability effects in relation to 3 topics (transport, climate change / the climate emergency and air quality) and small positive effects in relation to 6 topics (population, health and social inclusion, local economy and employment, land resources, water quality, biodiversity and local services and community infrastructure).

None of the assessed options would have negative effects upon any topic and the quantity of positive effects are a reflection of the wide ranging nature of the policy approach and the fact that no strategic local plan policy currently exists which covers these matters.

Overall, option 3 would be the most sustainable. However, it should be noted that, given the detailed requirements of option 3 across a range of policy areas, it would be very likely to result in a very long and complex policy. Local Plans are to be read as a whole so there would be practical advantages in providing a less detailed strategic policy, supported by a selection of more detailed policies (option 1).

STRATEGIC POLICIES / ST04 – Settlement Boundaries

- Summary of ‘options’:**
1. **A continuation of the WLLP policy GN1 approach with a slight relaxation to Protected Land policy** – Within settlement boundaries, development will be permitted, subject to compliance with other Local Plan policies. Outside settlement boundaries, land will either be designated as Protected Land or Green Belt. Protected Land policy would be similar to that in WLLP GN1(b), except that more types of housing will be permitted (so that the designation is not more restrictive than a Green Belt designation). Green Belt policy would follow national policy.
 2. **Do away with the Protected Land designation** – treat the land as greenfield sites within settlements or redesignate as Green Belt where the land is shown to fulfil at least one of the five Green Belt purposes.
 3. **Stronger protection for greenfield land within settlement boundaries** – within settlement boundaries (on unallocated sites), a much stronger presumption in favour of brownfield land development over greenfield.
- Overview of current baseline:** The current WLLP allows for development within settlement boundaries, with a preference for brownfield development over greenfield. Protected Land is subject to restrictions on development (only affordable housing, up to 10 units), and Green Belt follows national policy.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position. The slight relaxation of Protected Land policy is unlikely to have any material effect on this Topic Area compared to the baseline.</p>	<p style="text-align: center;">0 / +</p> <p>It is assumed that the removal of the Protected Land designation will result in some current Protected Land being redesignated as greenfield land within the settlement boundary where it is more likely it would be developed for housing. (The remainder would become Green Belt with very similar prospects for development to current prospects.)</p> <p>This could result in minor positive benefits under this Topic Area relative to the baseline.</p>	<p style="text-align: center;">0 / - / +</p> <p>This option is likely to result in less housing than the baseline position, which could lead to less accommodation able to address specific needs, for example the elderly. However, it could also lead to more Green Infrastructure which creates health benefits to a wide number of people. So, overall, minor positive and negative effects relative to the baseline.</p>
Housing (Objective 7)	<p style="text-align: center;">0 / +</p> <p>The slight relaxation of Protected Land policy may result in a small number of extra dwellings, so a minor positive effect relative to the baseline.</p>	<p style="text-align: center;">+</p> <p>This option could result in higher numbers of additional dwellings compared to the baseline, resulting in positive effects under this topic area.</p>	<p style="text-align: center;">-</p> <p>This option is most likely to result in less housing than the baseline position, so negative effects relative to the baseline for this topic area.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position. The slight relaxation of Protected Land policy is unlikely to have any material effect on this Topic Area compared to the baseline.</p>	<p style="text-align: center;">- / 0 / +</p> <p>This option would most likely lead to housing growth (positive indirect effects relative to the baseline) but potentially also loss of employment if horticultural sites are replaced by housing (therefore negative effects relative to the baseline).</p>	<p style="text-align: center;">0 / -</p> <p>Provision of less housing on greenfield sites could have indirect minor negative effects on the economy in relation to the baseline position.</p>

Topic	Option 1	Option 2	Option 3
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position. The slight relaxation of Protected Land policy is unlikely to have any material effect on this Topic Area compared to the baseline.</p>	<p style="text-align: center;">-</p> <p>This option would lead to negative effects relative to the baseline – extra housing is likely to lead to extra traffic.</p>	<p style="text-align: center;">+</p> <p>This option is likely to lead to positive effects relative to the baseline – less housing generally means less traffic / congestion / emissions / accidents.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position. The slight relaxation of Protected Land policy (e.g. allowing redevelopment of brownfield land) is unlikely to have any material effect on this Topic Area compared to the baseline.</p>	<p style="text-align: center;">-</p> <p>This option would lead to negative effects relative to the baseline – a policy that allows for housing on Protected Land is most likely to mean loss of greenfield land on such sites.</p>	<p style="text-align: center;">+ / -</p> <p>This option is likely to lead to positive effects relative to the baseline on terms of the stronger protection for greenfield land. There is a danger, however, of greater pressure for development on greenfield land (new site allocations) outside of settlements.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position. The slight relaxation of Protected Land policy is unlikely to have any material effect on this Topic Area compared to the baseline.</p>	<p style="text-align: center;">? / -</p> <p>The effects of this option relative to the baseline depend exactly where development would be located and whether it replaces derelict buildings. Allowing housing on sites where current policy (the baseline) does not allow housing would most likely lead to negative effects landscape-wise.</p>	<p style="text-align: center;">+ / -</p> <p>This option is likely to lead to positive effects relative to the baseline on terms of the quality of the built / historic environment within settlements. However, there is a danger of greater pressure for development on greenfield land (new site allocations) outside of settlements, which could lead to negative effects on landscape.</p>

Topic	Option 1	Option 2	Option 3
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position. The slight relaxation of Protected Land policy is unlikely to have any material effect on this Topic Area compared to the baseline. The effects of this option will instead depend on whether new development is energy-efficient and low carbon</p>	<p style="text-align: center;">0 / ?</p> <p>The effects of this option relative to the baseline are uncertain and depend on whether new development is energy-efficient and low carbon. Development of greenfield land could increase flood risk unless runoff rates were kept to greenfield rates.</p>	<p style="text-align: center;">?</p> <p>Effects under this topic area of greater protection for greenfield land are uncertain. Less housing means fewer opportunities for low carbon development, but fewer emissions from occupants of less energy-efficient homes.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position. The slight relaxation of Protected Land policy is unlikely to have any material effect on this Topic Area compared to the baseline.</p>	<p style="text-align: center;">-</p> <p>This option would most likely lead to negative effects relative to the baseline as more homes would be built in areas which have had protected land designations, leading to greater demands on water, more wastewater, and possible restricting of access to groundwater supply in the Northern Parishes area.</p>	<p style="text-align: center;">0 / +</p> <p>This option should lead to positive effects relative to the baseline as fewer homes would be built, leading to less demands on water supply, and less wastewater. However, if the houses were resultantly built elsewhere, overall effects would be neutral compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option is essentially the same as the baseline position. The slight relaxation of Protected Land policy is unlikely to have any material effect on this Topic Area compared to the baseline.</p>	<p style="text-align: center;">- / 0</p> <p>This option would most likely lead to negative effects relative to the baseline as more homes means more car journeys and more emissions of greenhouse gases. However, if the houses were resultantly built elsewhere, overall effects would be neutral compared to the baseline.</p>	<p style="text-align: center;">0 / +</p> <p>This option would most likely lead to positive effects relative to the baseline as fewer homes means fewer car journeys and less emissions of greenhouse gases. However, if the houses were resultantly built elsewhere, overall effects would be neutral compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p>0</p> <p>This option is essentially the same as the baseline position. The slight relaxation of Protected Land policy is unlikely to have any material effect on this Topic Area compared to the baseline.</p>	<p>0 / ? / +</p> <p>The effects of this option relative to the baseline are likely to be insignificant. Their exact nature depends where development would be located. The application of biodiversity net gain (BNG) could actually enhance biodiversity relative to the baseline position.</p>	<p>0 / ? / +</p> <p>The effects of this option relative to the baseline are unclear. Their exact nature depends where development would be located, and which greenfield sites were developed or not developed. BNG could mean new housing actually benefits biodiversity, so less new housing could mean less benefits.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p>0</p> <p>This option is essentially the same as the baseline position. The slight relaxation of Protected Land policy is unlikely to have any material effect on this Topic Area compared to the baseline.</p>	<p>0</p> <p>This option is unlikely to have anything other than insignificant effects relative to the baseline. It should not result in the creation of extra services, but extra residents could help sustain services.</p>	<p>0 / + / -</p> <p>This option may have no effect relative to the baseline, as greenfield land is protected primarily from housing under this option. But protecting greenfield land could constrain provision of new services and having fewer new residents in settlements could lead to services declining and being lost.</p>

Summary

Option 1 is very similar to the baseline position. Overall, it would be expected that there would be no, or insignificant, effects relative to the baseline position, with one positive in relation to housing provision as a result of the slight relaxation of Protected Land policy.

Option 2 would probably result in more housing development, so positive effects relative to the baseline in terms of housing provision, but negative effects in terms of land resources, landscape, water, and air quality.

Option 3 would result in less housing development within settlements, but possibly more elsewhere. Its effects relative to the baseline tend to be the opposite of option 2.

Overall, Option 1 is considered the most sustainable.

HOUSING AND COMMUNITIES / HC01a – Where housing can be located

- Summary of ‘options’:**
1. A general policy on where housing should (and should not) be built. This would link to the first Strategic Development Policy ('Delivering Sustainable Development') but refer to residential development only.
 2. Continue with the West Lancashire Local Plan 2012-2027 ('WLLP') current approach set out by Policy GN1 and supported by Policies SP1 and RS1.
 3. Be more restrictive than under current WLLP policy set out by GN1 and supported by Policies SP1 and RS1.
 4. Be less restrictive than under current WLLP policy set out by GN1 and supported by Policies SP1 and RS1.

Overview of current baseline: The baseline position comprises adopted Local Plan Policy GN1: Settlement Boundaries, supported by Policies SP1: A Sustainable Development Framework for West Lancashire and RS1: Residential Development. It also includes the National Planning Policy Framework and National Planning Practice Guidance, particularly in terms of how this relates to Green Belt. Option 2 therefore represents the baseline position.

Topic	Option 1	Option 2	Option 3	Option 4
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">-</p> <p>This option would have a negative effect compared to the baseline in relation to this topic. Limiting the numbers and / or types of housing in smaller settlements, would not assist in reducing isolation and would not improve economic, environmental and social conditions (quality of life) for deprived groups.</p>	<p style="text-align: center;">+</p> <p>This option would have a positive effect in relation to this topic. By having no limits to housing types and numbers permissible within settlements, it would assist in reducing isolation in the community and would improve economic, environmental and social conditions (quality of life) for deprived groups.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">-</p> <p>This option would have a negative effect in relation to this topic. By limiting the numbers and / or types of housing in smaller settlements the option is less likely to provide for an appropriate mix of housing to meet all needs including affordable housing and / or housing for the elderly.</p>	<p style="text-align: center;">+</p> <p>This option would have a positive effect in relation to this topic. By having no limits to housing types and numbers permissible within settlements it would assist in providing for an appropriate mix of housing to meet all needs including affordable housing and / or housing for the elderly.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Local Economy and Employment (Objectives 4-6)	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Transport (Objective 8)	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Land Resources (Objective 9)	<p>0 / ?</p> <p>By explicitly identifying Rural Exception Sites, it may not minimise the loss of best quality agricultural land.. However, this would be dependent on the chosen sites. Much of the approach would follow national policy (the baseline).</p>	<p>0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p>+</p> <p>This option would have a positive effect in relation to this topic. It may assist in minimising or reducing the loss of high quality (best and most versatile) agricultural land.</p>	<p>-</p> <p>This option would have a negative effect in relation to this topic. It would not assist in minimising or reducing the loss of high quality (best and most versatile) agricultural land.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Cultural heritage and landscape (Objective 10)	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p>+</p> <p>This option would have a positive effect in relation to this topic. It may assist in protecting the character and appearance of the Borough's landscape.</p>	<p>-</p> <p>This option would have a negative effect in relation to this topic. It would be less likely to assist in protecting and enhancing the character and appearance of the Borough's landscape.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Water quality and resources (Objective 12)	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Air quality (Objective 8)	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Biodiversity (Objective 13)	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline. The protection and enhancement of biodiversity is subject to its own policies and emerging national requirements.</p>	<p>0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline. The protection and enhancement of biodiversity is subject to its own policies and emerging national requirements.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline. The protection and enhancement of biodiversity is subject to its own policies and emerging national requirements.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p>-</p> <p>This option would have a negative effect in relation to this topic. By limiting the numbers and / or types of housing in smaller settlements, it would not assist in reducing isolation in the community.</p>	<p>+ / -</p> <p>This option would have a positive effect in relation to this topic. By having no limits to housing types and numbers permissible within settlements, it would assist in reducing isolation in the community. However, less control could also mean greater burdens are placed on local services.</p>

Summary

Option 1 is likely to be slightly better in terms of sustainability compared to the baseline position as it would have a positive effect in relation to the housing topic although an uncertain negative effect upon land resources.

Option 2 represents the baseline situation so has a neutral effect in sustainability terms.

Option 3 would have positive sustainability effects upon two topics (land resources and cultural heritage and landscape) but would have negative effects upon 3 topics (Population, Health and Social Inclusion, Housing and Local services and community infrastructure). As such, if each topic is given equal weigh this option would be a little less sustainable than the baseline.

Option 4 would be a less restrictive approach, but in doing so, could result in more housing on Protected land, and could have more negative effects on the sustainability of land resources and landscape.

As such, Option 1 would be the most sustainable.

HOUSING AND COMMUNITIES / HC01b(i) – Using land efficiently: brownfield and greenfield development

- Summary of ‘options’:**
1. To broadly follow national policy, encouraging the residential development of brownfield sites in preference to greenfield sites wherever possible, subject to viability. A minimum density standard would be set (expected to be 30 dwellings per hectare).
 2. Have no preference for brownfield land over greenfield land development.
 3. A more rigorous 'sequential' or 'phased' approach towards brownfield land development, requiring all suitable brownfield sites within a settlement to be considered for development first before development of greenfield sites, subject to viability.

Overview of current baseline: The baseline position comprises the National Planning Policy Framework, National Planning Practice Guidance (Effective use of land in particular) and the adopted Local Plan. In terms of the latter, relevant policies are primarily GN1: Settlement Boundaries and RS1: Residential Development; the former indicates when it may be appropriate to develop on brownfield and greenfield sites and the latter indicates appropriate densities for residential development.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p>0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p>0 / -</p> <p>This option would have a negative effect on this topic compared to the baseline. By choosing not to prioritise brownfield land over greenfield, it could increase the risk to certain 'undeveloped' areas of land, including public open and recreational space, and Green Infrastructure, that support opportunities for physical and mental health improvement.</p>	<p>0 / +</p> <p>This option would have little or no effect as it closely resembles the baseline position in relation to this topic. However, requiring all brownfield sites in a settlement to be developed, before considering greenfield sites, would help to protect areas of undeveloped land that are often 'greener' and can aid health and wellbeing.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">-</p> <p>The option would have a negative effect on this topic because it may not support the creation of sustainable settlements. By not having a policy preference for brownfield over greenfield land there could be a loss of open space and Green Infrastructure.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect as it closely resembles the baseline position in relation to this topic.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">-</p> <p>The option would have a negative effect on this topic. By not prioritising the development of brownfield land over greenfield it would not assist in reducing the amount of vacant, derelict, and contaminated land and, conversely, could encourage the loss of high quality (best and most versatile) agricultural land. It would not encourage the use of brownfield land in preference to greenfield land.</p>	<p style="text-align: center;">+</p> <p>The option would have a positive effect on this topic. By firmly prioritising the development of brownfield land over greenfield it should assist in reducing the amount of vacant, derelict, and contaminated land and minimising and reducing the loss of high quality (best and most versatile) agricultural land. It would also require (rather than encourage) the use of brownfield land in preference to greenfield land.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">-</p> <p>The option would have a negative effect on this topic. By not prioritising the development of brownfield land over greenfield the option would be less likely to support the conservation and enhancement of high quality built, natural and historic environments within the Borough (whether designated or not). It would also be less likely to protect and enhance the character and appearance of the Borough's landscape.</p>	<p style="text-align: center;">+</p> <p>The option would have a positive effect on this topic. By requiring the development of brownfield land over greenfield the option would be more likely to protect and enhance the character and appearance of the Borough's landscape.</p>

Topic	Option 1	Option 2	Option 3
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have little or no effect on this topic compared to the baseline. However, some of the greenfield land in the Borough is peat-based. As peat acts as a 'carbon sink', the removal of peat through development could release carbon into the atmosphere, contributing to climate change. If there was no preference for brownfield land over greenfield, then there is a greater risk that development of more greenfield land could contribute to climate change, although this would be dependent on the sites allocated.</p>	<p style="text-align: center;">0 / +</p> <p>This option would have little or no effect on this topic compared to the baseline. However, some of the greenfield land in the Borough is peat-based. As peat acts as a 'carbon sink', the removal of peat through development could release carbon into the atmosphere, contributing to climate change. Requiring brownfield sites to be developed first, could help minimise the development of peat-based land and, in turn, environmental damage, although this would be dependent on the sites allocated.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p>0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position. Brownfield sites can have as much biodiversity value as greenfield sites.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline. Brownfield sites can have as much biodiversity value as greenfield sites.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline. Brownfield sites can have as much biodiversity value as greenfield sites.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p>0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Summary

Option 1 would have neutral effects in terms of sustainability as it closely resembles the baseline position.

Option 2 would have negative effects in relation to the population, health and social inclusion, housing, land resources and cultural heritage and landscape topics and is therefore less sustainable compared to the baseline position.

Option 3 would have positive effects compared to the baseline in relation to the land resources and cultural heritage and landscape topics

Overall, Option 3 would be the most sustainable.

HOUSING AND COMMUNITIES / HC01b(ii) – Using land efficiently: Housing Density

- Summary of ‘options’:**
1. Require the same housing density for all areas, using the 'standard' minimum 30 dwellings per hectare cited in WLLP Policy RS1: Residential Development.
 2. Higher densities on all sites (say a minimum site density of 35 dwellings per hectare) in order to reduce the amount of land needed for building new homes.
 3. Allow / require lower density development on all sites in order to give people larger garden areas and / or more publicly accessible open space / space for nature.

Overview of current baseline: The baseline position comprises the National Planning Policy Framework, National Planning Practice Guidance (Effective use of land) and adopted Local Plan Policy RS1: Residential Development which indicates appropriate densities for residential development.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p>0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p>+ / -</p> <p>This option would have a positive effect on this topic compared to the baseline. By developing dwellings at higher densities, it would reduce the amount of land needed and so provide opportunities to protect areas of public open & recreational space, and Green Infrastructure, to support opportunities for physical and mental health improvement. However, it could lead to smaller 'private spaces' (i.e gardens) and denser developments could feel more 'enclosed', affecting health and mental wellbeing. Design would be important.</p>	<p>-</p> <p>This option would have a negative effect on this topic compared to the baseline. By developing dwellings at lower densities, it would increase the amount of development land needed and so would not provide opportunities to protect areas of public open and recreational space, and Green Infrastructure, to support opportunities for physical and mental health improvement. The larger garden areas and / or more publicly accessible open space / space for nature provided by developing at lower density would not offset this situation.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">+</p> <p>This option would have a positive effect on this topic compared to the baseline. By developing dwellings at higher densities, it would minimise the amount of development land required. Where greenfield land is needed to meet identified needs, a higher density could mean less high quality (best and most versatile) agricultural land is required to be released. The option would also achieve a more efficient use of land via a higher density of development.</p>	<p style="text-align: center;">-</p> <p>This option would have a negative effect on this topic compared to the baseline. By developing dwellings at lower densities, it would increase the amount of development land required. Where greenfield land is needed to meet identified needs, a lower density could mean more high quality (best and most versatile) agricultural land is required to be released. The option would also achieve a less efficient use of land via a lower density of development.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">+</p> <p>This option would have a positive effect on this topic compared to the baseline. By developing dwellings at higher densities there would be greater opportunities to protect and enhance the character and appearance of the Borough's landscape.</p>	<p style="text-align: center;">-</p> <p>This option would have a negative effect on this topic compared to the baseline. By developing dwellings at lower densities there would be less opportunity to protect and enhance the character and appearance of the Borough's landscape.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0 / ?</p> <p>This option would have little or no effect on this topic compared to the baseline. Higher density developments could mean less space is provided 'on site' to provide biodiversity improvements. However, good design should be able to find creative solutions to delivering improvements.</p>	<p style="text-align: center;">0 / ?</p> <p>This option would have little or no effect on this topic compared to the baseline. Lower density developments could mean more space is provided 'on site' to provide biodiversity improvements. Conversely, it could lead to more 'biodiverse' land being developed in the first place, although the requirement for Biodiversity Net Gain should compensate for this.</p>

Topic	Option 1	Option 2	Option 3
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Summary

Option 1 would have neutral effects in terms of sustainability as it closely resembles the baseline position.

Option 2 would have positive effects in relation to the population, health and social inclusion, land resources and cultural heritage and landscape topics and is therefore more sustainable compared to the baseline position.

Option 3 would have negative effects compared to the baseline in relation to the same population, health and social inclusion, land resources and cultural heritage and landscape topics and is therefore less sustainable compared to the baseline.

Overall, option 2 would be the most sustainable.

HOUSING AND COMMUNITIES / HC01c – Dwelling Sizes

- Summary of ‘options’:**
1. Require a mix of dwelling sizes for new developments, based on the Council's evidence base
 2. Exercise no control over dwelling sizes – let the developers build what they want
 3. Exercise strict control over dwelling sizes – setting out the required proportions and not allowing variation apart from in exceptional circumstances

Current baseline: There is no policy in the current WLLP governing dwelling sizes. The NPPF states that, in considering housing supply, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Most new dwellings built in the Borough are 3 or 4 bedroomed (AMR 2021). Option 2 is therefore most aligned to current policy (or the absence of it) which sets no requirements in respect of dwelling sizes

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	+	0	+
	There is no current policy governing dwelling sizes. Most new dwellings built in the Borough are 3- or 4-bedroom houses, but not everyone wants a dwelling of this size. Requiring a mix of dwelling sizes, informed by the Council's evidence base, may better provide housing to meet the needs of the Borough's population, support affordability and enable wider social inclusion.	This is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of dwelling sizes. It lets developers, and the market, dictate what sizes are provided, but can fail to provide for the needs of parts of the Borough's population, perhaps leading to unbalanced settlements (e.g. fewer young people can afford, or need, larger dwellings).	Exercising strict control over dwelling sizes, informed by the Council's evidence base, would help to provide housing to meet the needs of the Borough's population, support affordability and enable wider social inclusion. . However, it would be less flexible to changing market demands.

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">+</p> <p>There is no current policy governing dwelling sizes. Requiring a mix of dwelling sizes, informed by the Council's evidence base, may better provide an appropriate housing mix to meet the needs of the Borough's population, support affordability and aid sustainability.</p>	<p style="text-align: center;">0</p> <p>This is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of dwelling sizes. It lets developers, and the market, dictate what sizes are provided, but can fail to provide for the needs of parts of the Borough's population.</p>	<p style="text-align: center;">+ / -</p> <p>Exercising strict control over dwelling sizes, informed by the Council's evidence base, would help to provide housing to meet the needs of the Borough's population. However, it would be less flexible to changing market demands.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Land Resources (Objective 9)	<p style="text-align: center;">+ / 0</p> <p>Larger houses tend to take up more land, and therefore requiring a mix of dwelling sizes, including smaller homes, could help increase the densities of developments. However, it would be expected that this would be a minimal effect.</p>	<p style="text-align: center;">0</p> <p>This is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of dwelling sizes. This option would have little or no effect on this objective.</p>	<p style="text-align: center;">+ / 0</p> <p>Larger houses tend to take up more land, and therefore requiring a mix of dwelling sizes, including smaller homes, could help increase the densities of developments. However, it would be expected that such a tighter control would still only be a minimal effect.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no direct effect on this objective. Should all new dwellings be appropriately designed, in response to the climate emergency, then dwelling size should not create any impact on this objective.</p>	<p style="text-align: center;">0</p> <p>This is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of dwelling sizes. This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no direct effect on this objective. Should all new dwellings be appropriately designed, in response to the climate emergency, then dwelling size should not create any impact on this objective.</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no direct effect on this objective. Should all new dwellings be appropriately designed, with water efficiencies, then dwelling size should not create any impact on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no direct effect on this objective. Should all new dwellings be appropriately designed, with water efficiencies, then dwelling size should not create any impact on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no direct effect on this objective. Should all new dwellings be appropriately designed, with water efficiencies, then dwelling size should not create any impact on this objective.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Summary

Option 1 would provide greater control over dwelling sizes, supporting the provision of housing in relation to identified need. As a starting point for negotiation, it could help to address identified needs whilst also providing sufficient flexibility if there were other local, relevant considerations proffered by the developer. It would help provide more balanced communities by providing a greater mix of housing to address the needs of all.

Option 2 is most aligned to current policy (or the absence of it) which sets no requirements in respect of dwelling sizes and therefore provides no control over dwelling sizes in relation to identified need. It would be expected that there would still remain an unbalanced distribution of new dwelling sizes.

Option 3 would exercise the strictest control over dwelling sizes, which would make it difficult to respond to changing needs. For example, during COVID-19, demand for larger houses increased because people wanted additional rooms as home-office space.

Overall, Option 1 is considered the most sustainable.

HOUSING AND COMMUNITIES / HC01d – Affordable housing

- Summary of ‘options’:**
1. To continue to support 100% affordable housing (AH) schemes, and require a percentage of homes in developments of 10 or more dwellings be affordable
 2. Go for the minimum amount of affordable housing (as national policy) so to deliver other 'benefits', e.g. green-housing, biodiversity or infrastructure
 3. Go for the greatest possible amount of affordable housing at the expense of other 'good to have's'

Current baseline: WLLP Policy RS2: To support 100% affordable housing (AH) schemes and require a percentage of homes in developments of 10 or more dwellings be affordable. Option 1 generally continues the current baseline.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p>0</p> <p>This is the option most aligned to current policy. It supports the provision of affordable housing, in line with national policy, and so enabling people to access stable and affordable housing which can help support health and wellbeing. A greater range of housing opportunities better supports wider social inclusion and caters to the needs of the population.</p>	<p>+ / -</p> <p>This option would provide a minimum amount of AH, as national policy, so to provide other benefits. These other benefits could extend to 'green housing' or improved biodiversity, which, in turn, can create their own improvements to health and wellbeing, providing cheaper running costs and improved environments. However, by pursuing the minimum amounts of AH, fewer people will be given opportunities to access AH.</p>	<p>- / +</p> <p>This option would pursue the greatest amount of AH, which would be at the expense of other 'benefits'. More people would be able to access AH opportunities, but it would be harder to deliver 'green' housing or improve the local environment.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This is the option most aligned to current policy. It supports the provision of affordable housing, in line with national policy, and would be set in conjunction with the Council's evidence base.</p>	<p style="text-align: center;">-</p> <p>This option would provide a minimum amount of AH, as national policy, so to provide other benefits. However, by pursuing the minimum amounts of AH, fewer people will be given opportunities to access AH.</p>	<p style="text-align: center;">+</p> <p>This option would pursue the greatest amount of AH, which would be at the expense of other 'benefits'. More people would be able to access AH opportunities.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. Impact on land resources would largely be subject to how the policy would operate but AH would form part of the LPA's housing supply – which will prescribe a set figure of new homes.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. Impact on land resources would largely be subject to how the policy would operate but AH would form part of the LPA's housing supply – which will prescribe a set figure of new homes.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. Impact on land resources would largely be subject to how the policy would operate but AH would form part of the LPA's housing supply – which will prescribe a set figure of new homes.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. Should all new dwellings be appropriately designed, in response to the climate emergency, then affordable housing should not create any impact on this objective.</p>	<p style="text-align: center;">+</p> <p>Should all new dwellings be appropriately designed, in response to the climate emergency, then affordable housing should not create any impact on this objective. However, delivering minimum amounts of AH, to enable the 'savings' to be used elsewhere, could support 'green' housing features, such as net zero carbon, energy efficiency, or improved biodiversity, which could mitigate the climate emergency.</p>	<p style="text-align: center;">-</p> <p>Should all new dwellings be appropriately designed, in response to the climate emergency, then affordable housing should not create any impact on this objective. However, requiring maximum amounts of AH, would prevent the 'savings' to be used elsewhere, such as providing net zero carbon and energy efficient homes, or improved biodiversity, which could mitigate the climate emergency.</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. A policy positive towards AH could help ensure that suitable plots/sites are available in sustainable areas, thereby helping to support local services and community infrastructure.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. A policy positive towards AH could help ensure that suitable plots/sites are available in sustainable areas, thereby helping to support local services and community infrastructure.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. A policy positive towards AH could help ensure that suitable plots/sites are available in sustainable areas, thereby helping to support local services and community infrastructure.</p>

Summary

Option 1 is the option most aligned to current policy. It supports the provision of affordable housing, in line with national policy, so enabling people to access affordable housing which can help provide stability and support health and wellbeing. A greater range of housing opportunities better caters to the needs of the population and supports wider social inclusion.

Option 2 would provide a minimum amount of affordable housing, which would enable fewer people to access affordable housing, but could financially open up greater opportunities for other improvements, including those to tackle the climate emergency – such as net zero homes, or energy efficiencies.

Option 3 would pursue a maximum amount of affordable housing but at the likely expense of those other improvement opportunities, including those to tackle the climate emergency

Overall, option(s) 1 and 2 are considered the most sustainable.

HOUSING AND COMMUNITIES / HC01e – Housing for Older People

- Summary of ‘options’:**
1. Support the provision of accommodation for older people in appropriate and sustainable locations within settlements, requiring that new properties are accessible and adaptable, and supporting the development of care home / extra care home bedspace to meet identified needs, allocating specific sites for them where necessary.
 2. Have no prescriptive policies and let the market deliver housing as it sees fit.
 3. Have a more prescriptive policy to seek to achieve as much housing as possible for older people, with requirements for adaptable homes, and that a percentage of homes on large development sites be designed for older people.

Current baseline: Policy RS2 of the current Local Plan sets that specialist housing for the elderly will be provided in sustainable locations via specific schemes for elderly accommodation (e.g. Extra care and sheltered accommodation) and through the requirement in Policy RS1 that, in schemes of 15 dwellings or more, 20% of new residential units should be designed specifically as accommodation suitable for the elderly. Policy RS1 also states that development proposals for elderly accommodation will be encouraged within new settlements, provided that they are accessible, and that all new homes will be expected to meet the Lifetime Homes Standard (although this standard is now redundant, having been replaced by Building Regulations M4(2) for accessible and adaptable homes).

Option 1 and 3 are therefore most aligned to the current baseline position.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0 / +</p> <p>This approach is closely aligned to the existing baseline. This option would continue to support the provision of older people's accommodation in appropriate locations within settlements to help aid independent living. It would provide flexibility and management of new development to ensure older peoples' accommodation is appropriately designed and sustainably located, supporting social inclusion and physical and mental health. In addition, the allocation of specific sites to provide care homes would mean greater numbers of people could be supported with health care or assisted living.</p>	<p style="text-align: center;">-</p> <p>This option would have no prescriptive policies on older persons housing but would instead let the market deliver housing as it sees fit. This could mean that larger numbers of older person's housing come to the market, if led by demand, but conversely could give the Council less control over its location and design which could, in turn, have negative impacts on health and social inclusion.</p>	<p style="text-align: center;">0 / +</p> <p>This option would require that a percentage of homes on new, large housing sites be designed specifically for older people to M4(2) standards and so is also closely aligned to the current baseline. It would also allocate sites for care homes / extra care developments. Consequently, it could result in slightly positive improvements compared to the current baseline by supporting the provision of more accommodation types to support ageing needs. With an increasingly ageing population it would be expected a greater number of care homes would be needed to support health and assisted living.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0 / +</p> <p>This approach is closely aligned to the existing baseline. This option would continue to support the provision of older people's accommodation in appropriate locations within settlements and promote good design. In addition, it would also allocate sites for care homes / extra care developments and therefore would help support a greater supply of older person's housing supply.</p>	<p style="text-align: center;">+ / -</p> <p>This option would have no prescriptive policies on older persons housing but would let the market deliver housing as it sees fit. This could mean that larger numbers of older person's housing come to the market, subject to demand, but conversely could give the Council less control over its location and design.</p>	<p style="text-align: center;">0 / +</p> <p>This option would require that a percentage of homes on new, large housing sites be designed specifically for older people to M4(2) standards and so is also closely aligned to the current baseline. In addition, it would also allocate sites for care homes / extra care developments and so would represent a positive effect on the existing baseline in relation to older person's housing supply. This approach would seek to achieve as much housing as possible for older people and therefore would have the greatest positive effect on older persons housing provision.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective, compared to the existing baseline which already supports older persons housing being located in the most sustainable areas so to ensure that developments are within good access of transport links.</p>	<p style="text-align: center;">-</p> <p>Allowing the market to deliver as it sees fit, could result in less control over the location of that development, which may mean that developments are not within good access of transport links.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective, compared to the existing baseline which already supports (major developments and) older persons housing being located in the most sustainable areas so to ensure that developments are within good access of transport links.</p>
Land Resources (Objective 9)	<p style="text-align: center;">?</p> <p>This option would have little or no effect on this objective, compared to the existing baseline. However, the need to allocate land for care homes could have an impact on land resources, dependent on the identified need and the sites selected.</p>	<p style="text-align: center;">- / ?</p> <p>Allowing the market to deliver as it sees fit, could result in less control over the location of that development with an unknown impact on land resources.</p>	<p style="text-align: center;">?</p> <p>This option would have little or no effect on this objective, compared to the existing baseline. However, the need to allocate land for care homes could have an impact on land resources, dependent on the identified need and the sites selected.</p>

Topic	Option 1	Option 2	Option 3
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective, compared to the existing baseline which already supports older persons housing being located in the most sustainable areas so to ensure that developments are within good access of services.</p>	<p style="text-align: center;">-</p> <p>Allowing the market to deliver as it sees fit, could result in less control over the location of that development, which may mean that developments are not within good access of services.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective, compared to the existing baseline which already supports (major developments and) older persons housing being located in the most sustainable areas so to ensure that developments are within good access of services.</p>

Summary

Option 1 would continue to support the provision of older people's accommodation in line with the existing baseline, but would also go further to allocate sites for care homes / extra care developments which would have a more positive effect on the provision of older peoples' housing supply.

Option 2 would allow the market to deliver older persons housing as it sees fit, which, given the Borough's increasingly ageing population, could result in a greater amount of provision, flexible and responsive to demand. However, it could also result in less control over the amount, nature and location of that development which could have negative impacts on sustainability, accessibility and appropriate design.

Option 3 would follow much of Option 1, but the approach would additionally seek to achieve as much housing as possible for older people. Whilst this would have the greatest positive effect on older persons housing supply, it may be too prescriptive and inflexible.

Overall, option 1 is considered the most sustainable. A hybrid with option 3 may be the most sustainable approach.

HOUSING AND COMMUNITIES / HC01f – Custom and Self-Build Housing

- Summary of ‘options’:**
1. A specific policy on custom and self-build (C&SB) housing
 2. Have no local policy on custom and self-build housing, leaving it to the market to deliver

Current baseline: There is no policy in the current WLLP governing custom and self-build housing and so option 2 represents the current baseline. LPAs have a duty to give enough suitable development permissions to meet identified demand (NPPF footnote 26)

Topic	Option 1	Option 2
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>A policy requiring C&SB housing, would provide greater opportunities for people to build and own their house, and so access stable housing (market or affordable) which can support health and wellbeing. A greater range of housing opportunities better supports wider social inclusion and caters to the needs of the population.</p>	<p style="text-align: center;">0</p> <p>This is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of C&SB housing. It lets the market deliver, but in doing so, could mean there are insufficient plots (or permissions) available to meet identified need. A greater range of housing opportunities better supports wider social inclusion and caters to the needs of the population.</p>

Topic	Option 1	Option 2
Housing (Objective 7)	<p style="text-align: center;">+</p> <p>A policy requiring C&SB housing, would provide greater opportunities for people to build and own their house, and so access stable housing (market or affordable). A policy supporting C&SB housing would help the LPA meet national obligations to ensure there is enough development opportunities for C&SB housing.</p>	<p style="text-align: center;">0</p> <p>This is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of C&SB housing. It lets the market deliver, but in doing so, could mean there are insufficient plots (or permissions) available to meet identified need. It would also make it harder for the LPA to meet national obligations to ensure there is enough development opportunities for C&SB housing.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2
Land Resources (Objective 9)	<p style="text-align: center;">?</p> <p>Impact on land resources would largely be subject to how the policy would operate – whether by distinct allocations or requiring a percentage of plots on larger developments to be set aside, for C&SB housing. C&SB housing would form part of the LPA's housing supply – which will prescribe a set figure of new homes.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have little or no effect on this objective. This is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of C&SB housing.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have minimal effect on this objective. The impact on landscape would be more affected by the location of development.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. Should all new dwellings be appropriately designed, in response to the climate emergency, then C&SB housing should not create any impact on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. This is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of C&SB housing.</p>

Topic	Option 1	Option 2
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. Should all new dwellings be appropriately designed, in response to the water efficiencies, then C&SB housing should not create any impact on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. This is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of C&SB housing.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective..</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Summary

Option 1 is more positive towards supporting C&SB housing, enabling the LPA to meet national requirements and to provide wider housing opportunities that better supports wider social inclusion and caters to the needs of the population, whilst also facilitating better planning / use of land resources and encouraging plots to be located in the most sustainable areas close to existing services.

Option 2 is the option most aligned to current policy (or the absence of it) which sets no requirements in respect of C&SB housing. It would not specifically help to provide C&SB housing.

Overall, Option 1 is considered the most sustainable.

HOUSING AND COMMUNITIES / HC01g – Accommodation for students

- Summary of 'options':**
1. Continue the current approach to student HMOs. This option would involve minor alterations, including reducing the percentages of permitted HMOs permissible on most streets, with some streets set at 0% HMOs.
 2. Have a more relaxed policy approach towards student accommodation than the present WLLP.
 3. Have a tighter policy approach compared with the current WLLP, to allow no more HMOs within the Article 4 Direction area of Ormskirk / Aughton and Westhead. It would also restrict purpose-built student accommodation development on the university campus.

Overview of current baseline: WLLP Policy RS3 sets limits on the percentage of properties that can be HMOs in different streets and supports purpose-built student accommodation within the University Campus. The Policy is applicable in conjunction with an Article 4 Direction relating to HMOs and covering Ormskirk and Aughton. Option 1 most closely aligns with the current baseline.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>By continuing the current Local plan policy with some minor amendments to the percentage of HMOs in certain streets, there will be a minor positive change. It would ensure that the balance of students and residents is not further eroded by conversions of dwellings to HMOs, but that the student population remains socially included within the town.</p>	<p style="text-align: center;">-</p> <p>By relaxing the rules regarding Student Accommodation, this option would result in a negative impact on the non-student population of the town, by virtue of resulting in streets which may only be predominantly occupied during term time, and also by eroding the sense of community within streets. The conversion of houses to HMOs can also have an impact on the availability of market homes, and, in doing, so can push up prices leading to affordability issues.</p>	<p style="text-align: center;">+ / -</p> <p>A tighter approach, to restrict Student Accommodation (HMOs) in Ormskirk and the surrounding area, and to restrict student accommodation development to the University campus only (non-Green Belt), would more tightly control the amount of new student accommodation that would be provided. This could protect the availability/affordability of market homes, but force students to live on campus, away from the town and so have a negative effect on social inclusivity.</p>
Housing (Objective 7)	<p style="text-align: center;">+</p> <p>This option would have a positive impact on housing as it would ensure the retention of sufficient market housing within the town and surrounding areas. It would also appropriately plan for student accommodation provision.</p>	<p style="text-align: center;">-</p> <p>The relaxation of the rules could lead to a significant number of dwellings being converted to HMOs therefore reducing the available market housing in the town and surrounding area, and, in conjunction, affecting housing affordability.</p>	<p style="text-align: center;">+</p> <p>This option would have a positive impact on housing as it would ensure the retention of sufficient market housing within the town and surrounding areas. Student accommodation would be planned for but restricted to the University campus only.</p>

Topic	Option 1	Option 2	Option 3
Local Economy and Employment (Objectives 4-6)	<p>0</p> <p>This option is closely aligned to the current baseline position and therefore would have a neutral effect.</p>	<p>+ / -</p> <p>This option could result in more students living in HMOs in the town and could therefore support the local economy, particularly leisure and hospitality. However, an increase in students may result in the reduction of residents of employment age which could have a negative impact on the employment within the area.</p>	<p>-</p> <p>This option would restrict future growth of the student population to on-campus only which may have a negative impact on the local economy, as fewer students may be expected to visit and support the town centre by remaining on-campus, and therefore this option may have a negative impact when compared to the baseline position.</p>
Transport (Objective 8)	<p>0</p> <p>This option would have little or no direct effect on this objective</p>	<p>0</p> <p>This option would have little or no direct effect on this objective</p>	<p>0</p> <p>This option would have little or no direct effect on this objective</p>
Land Resources (Objective 9)	<p>0</p> <p>This option would have little or no effect on this objective.</p>	<p>0</p> <p>This option would have little or no effect on this objective.</p>	<p>0 / +</p> <p>This option would have little or no effect on this objective. Requiring new student accommodation to be on -campus only, but on non-Green belt parts of the campus, would help maximise the use of the existing site, reducing demands on other land resources</p>

Topic	Option 1	Option 2	Option 3
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any noticeable effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any noticeable effect compared to the baseline for this objective.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>0</p> <p>This option would have little or no effect on this objective</p>
Local services and community infrastructure (Objectives 3 and 8)	<p>0</p> <p>This policy option is unlikely to have any noticeable effect compared to the baseline for this objective.</p>	<p>-</p> <p>This policy option may have a minor negative impact, as the increased number of students within the town and surrounding area would add pressure to local services and community infrastructure.</p>	<p>0</p> <p>This policy option is unlikely to have any noticeable effect compared to the baseline for this objective.</p>

Summary

Option 1 is most aligned to current policy (the baseline position), however it proposes minor alterations, including changes to HMO quotas. It is considered these changes would positively improve the sustainability of the policy.

Option 2 would allow a more relaxed policy approach towards student accommodation than the current WLLP. However, it is considered that this would in negative effects with regard to services, infrastructure, housing and population when compared to the baseline.

Option 3 restricts off campus accommodation and restricts purpose-built student accommodation to the University campus only, which would likely create a mix of positive and negative effects across the objectives.

Overall, Option1 is considered the most sustainable.

HOUSING AND COMMUNITIES / HC01h – Caravan & houseboat dwellers

- Summary of ‘options’:**
1. Continue with the current WLLP policy approach. i.e., support the rural economy in general, and treat proposals for expansion or enhancement of facilities on their merits, in accordance with ‘the usual’ policies (e.g., on Green Belt).
 2. Plan positively for houseboat and residential caravan developments.
 3. Plan less positively for caravan / houseboat development, restricting such uses in the Green Belt in order to preserve its openness.

Overview of current baseline: The existing baseline is the current WLLP policy approach. This seeks to support the rural economy in general and treat proposal for expansion or enhancement of facilities on their merits, in accordance with ‘the usual’ policies (e.g. on Green Belt).

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline.</p>	<p style="text-align: center;">+</p> <p>To plan positively for caravan and house-boat dwellers would improve the social inclusion of this demographic and would therefore have a positive effect on this objective.</p>	<p style="text-align: center;">-</p> <p>This policy option would likely have a negative impact on site provision if a more restrictive approach was to be taken, for example by restricting such uses in the Green Belt. This policy option would therefore be expected to have a negative effect compared to the baseline position.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline.</p>	<p style="text-align: center;">+</p> <p>To plan positively for caravan and houseboat dwellers would result in better provision of land/space for these homes and thereby have a positive effect when compared to the baseline. .</p>	<p style="text-align: center;">-</p> <p>This approach would see a more restrictive approach, potentially resulting in fewer housing opportunities these communities. This policy option would therefore be expected to have a negative effect compared to the baseline position.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline.</p>	<p style="text-align: center;">+</p> <p>Positively planning for houseboat and residential caravan sites could help support the rural economy as these tend to be the areas in which such uses naturally fall Allocating specific areas of land for such uses could help promote and support links to those local, rural economies and would therefore be a positive effect compared to the baseline.</p>	<p style="text-align: center;">-</p> <p>A more restrictive approach would limit such uses in the Green Belt and/or only permit development where a good number of facilities are close by. This may result in weaker support for the rural economy where these uses tend to be naturally based.</p>

Topic	Option 1	Option 2	Option 3
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline.</p>	<p style="text-align: center;">0 / +</p> <p>This policy option would likely have little or no effect compared to the baseline for this objective. However, positive planning for houseboats and caravans could ensure that they are sited in the most sustainable locations, thereby limiting the need for private vehicular use (more relevant to caravans than houseboats).</p>	<p style="text-align: center;">0 / -</p> <p>This policy option would likely have little or no effect compared to the baseline for this objective. However, less positive planning for houseboats and caravans could mean that they are sited in the least sustainable locations, thereby increasing the need for private vehicular use (more relevant to caravans than houseboats).</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline</p>	<p style="text-align: center;">+ / -</p> <p>Planning positively for caravan and houseboat developments would mean that land would be allocated specifically for such uses. These allocations may include green belt, and so this approach could have a negative effect on land resources. Conversely, allocations could better proactively protect land resources rather than dealing with applications for these uses 'reactively.</p>	<p style="text-align: center;">+</p> <p>A more restrictive approach, for example restricting such uses from the Green Belt, could help protect land resources and direct development to the most appropriate sites / areas. This policy option would therefore be expected to have a positive effect compared to the baseline position.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective. Impacts on landscape would be dependent on any sites chosen.</p>	<p style="text-align: center;">0 / +</p> <p>This policy option will have little or no effect compared to the baseline for this objective. However, restricting such uses in the Green Belt could help protect the openness of that landscape.</p>

Topic	Option 1	Option 2	Option 3
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>

Topic	Option 1	Option 2	Option 3
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2 (the baseline position) and therefore will have a neutral effect on the baseline</p>	<p style="text-align: center;">+</p> <p>This policy approach would result in the LPA being able to plan positively in terms of where local services and community infrastructure would be required to serve this community. This policy option would therefore be expected to have a positive effect compared to the baseline position.</p>	<p style="text-align: center;">0 / +</p> <p>This approach could only permit development where a good number of facilities are close by, which could place additional pressures on local services and community infrastructure, although this impact would be expected to be limited owing to the relatively small number of residential caravan sites / houseboat marinas. The policy could help direct these types of development to the most sustainable areas. This policy option would therefore be expected to have a neutral or positive effect compared to the baseline position.</p>

Summary

Option 1 would seek to continue with the current WLLP policy and therefore would have a neutral effect on the existing baseline position.

Option 2 would pro-actively ensure that there is sufficient land within close proximity to services and transport links, although this could result in a loss of land resources or impact on the landscape.

Option 3 is a more restrictive approach and would result in a negative effect when compared to the baseline in terms of housing, the local economy and social inclusion. As a result, this is the least sustainable of the options.

Overall, Option 1 would be the most sustainable option as it continues with the existing current baseline would help support the rural economy and treats proposals for the expansion or enhancement of facilities on their merits, in accordance with other policies.

HOUSING AND COMMUNITIES / HC01i – Gypsies, Travellers and Travelling Show people (GTTS)

- Summary of 'options':**
1. Allocate sites in which Travellers currently occupy, or own.
 2. Allocate suitable sites (including through CPO) to meet Traveller needs in areas where Traveller needs exist
 3. Set aside part of new housing / employment site allocations as Traveller sites
 4. Leave the matter of a Traveller site allocation to a future DPD
 5. A hybrid of options 1-3

Current baseline: There is no GTTS policy in the current Local Plan, and so guidance 'defaults' to national policy. The NPPF should be read in conjunction with the Government's planning policy for traveller sites, and sets that plans should reflect the different types of housing needed for different groups including travellers.

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+ / 0</p> <p>This approach would formalise the existing baseline position, which, in the absence of policy, presently allows travellers to stay on unauthorised sites. Some of those existing sites are in areas at high flood risk.</p> <p>Accommodation for the elderly (GTTS) would be provided by virtue of overall provision but not beyond the existing baseline.</p> <p>It may improve quality of life by giving GTTS more certainty in residing in a settled location, with similar access to schools and health services.</p>	<p style="text-align: center;">+</p> <p>Use of Compulsory Purchase Orders (CPOs) of more suitable sites could improve access to services and improve quality of life by allowing GTTS more certainty in residing in a settled location, with similar access to schools and health services. It could also reduce isolation in the community.</p>	<p style="text-align: center;">+</p> <p>This approach would set aside part of new site allocations for GTTS. As these allocations would most likely be in the most sustainable areas of the Borough, it would improve quality of life for GTTS by giving GTTS more certainty in residing in a settled location, with access to schools and health services. This approach would also be more likely to reduce isolation in the GTTS communities.</p>	<p style="text-align: center;">0 / -</p> <p>This approach would not immediately address the obligation for the LPA to find GTTS sites, as required by national policy. It would continue the existing position, with travellers allowed to stay on unauthorised sites. Longer term, without a separate, immediate DPD, quality of life may be affected as the GTTS community would not have a settled location available. This approach effectively 'kicks the can down the road', and the issues would be better wholly addressed through the Local Plan.</p>	<p style="text-align: center;">+</p> <p>A hybrid option of 1,2 and 3 would allocate some existing GTTS sites, allocate additional sites to meet current needs, potentially using CPO, and set aside parts of new allocations for GTTS needs. Subsequently, this approach would formalise (some of) the existing baseline position and provide additional sites in sustainable areas. It would improve quality of life for GTTS by giving GTTS more certainty in residing in a settled location, with access to schools and health services. This approach would also be more likely to reduce isolation in the GTTS communities.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Housing (Objective 7)	<p style="text-align: center;">+ / 0</p> <p>This approach would support the provision of non-mainstream housing by giving formal permanence to some existing GTTS sites and therefore would be most consistent with the baseline. However, some existing sites are in areas of high flood risk and so may not be suitable for allocation, meaning that there could be an insufficient supply of suitable sites</p>	<p style="text-align: center;">+ / -</p> <p>The provision of non-mainstream housing would be supported and give greater opportunity for the needs of GTTS to be met. There would be an opportunity to support the creation of more sustainable settlements through CPO'ing of suitable sites. However, in practice, this approach could possibly lead to a 'Catch 22' situation where the site could not be allocated unless the CPO were guaranteed to succeed (the site must be 'deliverable'), and the CPO would not be granted unless the site were allocated.</p>	<p style="text-align: center;">+ / -</p> <p>The provision of non-mainstream housing would be supported and give greater opportunity for the needs of GTTS to be met. However, there would be a strong possibility that the allocation of part of a site for GTTS could affect market demand / delivery of the remainder of the site.</p>	<p style="text-align: center;">- / 0</p> <p>This approach would not immediately address the obligation for the LPA to find GTTS sites, as required by national policy. It would, in the interim, continue the existing position, with travellers allowed to stay on unauthorised sites. As a GTTS DPD would likely follow the Local Plan DPD, this would create further delay to identifying GTTS sites.</p>	<p style="text-align: center;">+</p> <p>A hybrid option of 1,2 and 3 would do the most to ensure that GTTS could be flexibly delivered in accordance with need, and in the most sustainable locations – including away from flood risk areas.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Local Economy and Employment (Objectives 4-6)	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>0</p> <p>This option would have little or no effect on this objective.</p>	<p>0</p> <p>This option would have little or no effect on this objective.</p>	<p>0</p> <p>This option would have little or no effect on this objective.</p>
Transport (Objective 8)	<p>0</p> <p>This option would have little or no effect on this objective. It would, in the interim, continue the existing position, with travellers allowed to stay on unauthorised sites.</p>	<p>?</p> <p>Dependent on the location of any site allocations, this could increase opportunities for walking, cycling and public transport use. Further assessment would be needed alongside such considerations of sites.</p>	<p>?</p> <p>Dependent on the location of any site allocations, this could increase opportunities for walking, cycling and public transport use. Further assessment would be needed alongside such considerations of sites.</p>	<p>0 / -</p> <p>As a GTTS DPD would likely follow the Local Plan DPD, this would create further delay to identifying GTTS sites. It would, in the interim, continue the existing position, with travellers allowed to stay on unauthorised sites.</p>	<p>+</p> <p>A hybrid option of 1,2 and 3 would do the most to ensure that GTTS could be flexibly delivered in accordance with need, and in the most sustainable locations. Dependent on the location of any site allocations, this could increase opportunities for walking, cycling and public transport use.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Land Resources (Objective 9)	<p style="text-align: center;">0 / ?</p> <p>This is the option most closely aligned to the current baseline position. Dependent on the sites allocated, this option may encourage the use of brownfield land. Some existing GTTS sites are in areas of high flood risk and so may not be suitable for allocation..</p>	<p style="text-align: center;">?</p> <p>Dependent on the sites CPO'd / allocated, this option may encourage the use of brownfield land. Further assessment would be needed alongside such considerations of sites.</p>	<p style="text-align: center;">?</p> <p>Dependent on the sites allocated, this option may encourage the use of brownfield land. Further assessment would be needed alongside such considerations of sites.</p>	<p style="text-align: center;">0 / -</p> <p>As a GTTS DPD would likely follow the Local Plan DPD, this would create further delay to identifying GTTS sites. It would, in the interim, continue the existing position, with travellers allowed to stay on unauthorised sites.</p>	<p style="text-align: center;">+</p> <p>A hybrid option of 1,2 and 3 would do the most to ensure that GTTS could be flexibly delivered in accordance with need, and in the most sustainable locations. Dependent on the sites chosen, this option may encourage the use of brownfield land. Further assessment would be needed alongside such considerations of sites.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This is most closely aligned to the current baseline position. Dependent on the sites allocated, this option may have some impact on landscape; for example, if sites located in the Green Belt were selected there could be an adverse effect on the openness of the Green Belt.</p>	<p style="text-align: center;">+ / ?</p> <p>Dependent on the sites allocated, this option may have some impact on landscape; for example, if sites located in the Green Belt were selected there could be an adverse effect on the openness of the Green Belt. It could also protect and enhance landscape by relocating travellers from current locations in the Green Belt to more policy compliant locations. Further assessment would be needed alongside such considerations of sites.</p>	<p style="text-align: center;">+ / ?</p> <p>Dependent on the sites allocated, this option may have some impact on landscape; for example, if sites located in the Green Belt were selected there could be an adverse effect on the openness of the Green Belt. It could also protect and enhance landscape by relocating travellers from current locations in the Green Belt to more policy compliant locations. Further assessment would be needed alongside such considerations of sites.</p>	<p style="text-align: center;">0</p> <p>As a GTTS DPD would likely follow the Local Plan DPD, this would create further delay to identifying GTTS sites. It would, in the interim, continue the existing position, with travellers allowed to stay on unauthorised sites.</p>	<p style="text-align: center;">+ / -</p> <p>A hybrid option of 1,2 and 3 would do the most to ensure that GTTS could be flexibly delivered in accordance with need, and in the most sustainable locations. Dependent on the sites chosen, this option may have some impact on landscape; for example, if sites located in the Green Belt were selected there could be an adverse effect on the openness of the Green Belt. It could also protect and enhance landscape by relocating travellers from current locations in the Green Belt to more policy compliant locations. Further assessment would be needed alongside such considerations of sites.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Climate change / the climate emergency, energy and flooding (Objective 11)	<p>0</p> <p>A number of existing sites are already located in areas at high risk of flooding (FZ3). Formalising these sites as allocations would not manage or reduce their flood risk. However, this is most closely aligned to the current baseline position and so would only prolong the baseline.</p>	<p>+</p> <p>This approach would help to reduce flood risk by compulsory purchase of sites for a vulnerable type of development in areas at lower risk. It would improve the baseline situation by potentially re-locating a proportion of needs away from areas at high flood risk. This would require further assessment once actual sites were known.</p>	<p>+</p> <p>This approach would seek to allocate GTTS sites away from areas of flood risk, so improving the current baseline position. Further assessment would be needed alongside such considerations of sites.</p>	<p>0 / -</p> <p>As a GTTS DPD would likely follow the Local Plan DPD, this would create further delay to identifying GTTS sites. It would, in the interim, continue the existing position, with travellers allowed to stay on unauthorised sites, some of which are located in areas at high risk of flooding.</p>	<p>+</p> <p>A hybrid option of 1,2 and 3 would do the most to ensure that GTTS could be flexibly delivered in accordance with need, and in the most sustainable locations – including away from areas of high flood risk.</p>
Water quality and resources (Objective 12)	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>0</p> <p>This option would have little or no effect on this objective</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Air quality (Objective 8)	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>?</p> <p>It is not certain that this approach could meet needs where they arise and therefore could result in longer journeys, hence more emissions compared to the baseline situation. Further assessment would be needed alongside the considerations of sites.</p>	<p>?</p> <p>It is not certain that this approach could meet needs where they arise and, therefore, could result in longer journeys, hence more emissions compared to the baseline situation. Further assessment would be needed alongside the considerations of sites.</p>	<p>0</p> <p>This option would have little or no effect on this objective.</p>	<p>?</p> <p>A hybrid option of 1,2 and 3 would do the most to ensure that GTTS could be flexibly delivered in the most sustainable locations. The location of sites may have an impact on journeys and air quality. Further assessment would be needed alongside the considerations of sites.</p>
Biodiversity (Objective 13)	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>?</p> <p>The effects of this option depend on the location of sites. Authorised (allocated) sites rather than unauthorised sites are less likely to mean harm to biodiversity or habitats. This is not guaranteed, however and further assessment would be needed alongside the considerations of sites.</p>	<p>?</p> <p>The effects of this option depend on the location of sites. Authorised (allocated) sites rather than unauthorised sites are less likely to mean harm to biodiversity or habitats. This is not guaranteed, however and further assessment would be needed alongside the considerations of sites.</p>	<p>0</p> <p>This option would have little or no effect on this objective</p>	<p>?</p> <p>The effects of this option depend on the location of sites. Authorised (allocated) sites rather than unauthorised sites are less likely to mean harm to biodiversity or habitats. This is not guaranteed, however and further assessment would be needed alongside the considerations of sites.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Local services and community infrastructure (Objectives 3 and 8)	<p>0</p> <p>This is most closely aligned to the current baseline position. Formalising the sites would be unlikely to affect local services and community infrastructure.</p>	<p>+ / ?</p> <p>This approach would CPO sites for GTTS, likely co-locating them with the settled community. As these allocations would most likely be in the most sustainable areas of the Borough, it would improve quality of life for GTTS by giving GTTS more certainty in residing in a settled location, with access to schools and health services. Further assessment would be needed alongside the considerations of sites.</p>	<p>+ / ?</p> <p>This approach would set aside part of new site allocations for GTTS, co-locating them with the settled community. As these allocations would most likely be in the most sustainable areas of the Borough, it would improve quality of life for GTTS by giving GTTS more certainty in residing in a settled location, with access to schools and health services. Further assessment would be needed alongside the considerations of sites.</p>	<p>0 / -</p> <p>As a GTTS DPD would likely follow the Local Plan DPD, this would create further delay to identifying GTTS sites. It would, in the interim, continue the existing position, with travellers allowed to stay on unauthorised sites, which may not be close to local services and community infrastructure.</p>	<p>+ / ?</p> <p>A hybrid option of 1,2 and 3 would do the most to ensure that GTTS could be flexibly delivered in accordance with need, and in the most sustainable locations. It would improve quality of life for GTTS by giving GTTS more certainty in residing in a settled location, with access to schools and health services. Further assessment would be needed alongside the considerations of sites.</p>

Summary

Option 1 is closest aligned to the current baseline position but would serve to authorise those sites – a positive effect relative to the baseline.

Option 2 is potentially more sustainable than the baseline and GTTS site allocations would create some positive effects in relation to health, social inclusion, housing and flooding. However, much of the outcomes are linked to the location of sites, which is not known at this time. Further assessment would be needed alongside the consideration of sites.

Option 3 compares positively to the baseline and would create some positive effects in relation to health, social inclusion, housing and flooding. However, much of the outcomes are linked to the location of sites, which is not known at this time. Further assessment would be needed alongside the consideration of sites.

Option 4 effectively delays the identification of GTTS sites, preventing them from being considered holistically within the Local Plan. It would fail to immediately address GTTS needs and effectively 'kicks the can' further down the road.

Option 5, a hybrid of options 1,2 and 3, is considered the most sustainable and would do the most to ensure that GTTS sites could be flexibly delivered in accordance with need, and in the most sustainable locations, creating positive effects across many of the objectives. As before, many of the outcomes are linked to the location of sites, which is not known at this time, but this option enables the most flexible approach. Further assessment would be needed alongside the consideration of sites.

Overall, Option 5 is considered the most sustainable.

HOUSING AND COMMUNITIES / HC01j – Accommodation for Temporary Agricultural Workers

- Summary of ‘options’:**
1. Continue with a similar policy to current approach, which allows for the re-use of existing buildings, and for non-permanent accommodation (subject to certain criteria).
 2. Have a more relaxed policy, allowing it in the countryside and Green Belt with minimal criteria to satisfy.
 3. Have no policy at all on accommodation for temporary agricultural workers, but simply rely on national Green Belt/Countryside policy in general.

Overview of current baseline: WLLP Policy RS5 supports the re-use of existing buildings (in settlements and in the countryside, including the Green Belt) to accommodate temporary agricultural workers, provided it complies with other policy. It also allows for non-permanent accommodation subject to certain criteria, e.g., there exists a need, there are no existing buildings that could be used, the site is the most suitable in the area, and the impact is minimised / mitigated. Option 1 is therefore most closely aligned to the current baseline position.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p>0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p>-</p> <p>This policy option could have a minor negative impact on this objective as it may result in a larger number of agricultural workers living within the countryside, away from services which could affect health and wellbeing and social inclusion</p>	<p>0 / -</p> <p>This approach would rely on national policy and consequently give less local control over accommodation for temporary agricultural workers. It may have a minor negative effect on this objective when compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p style="text-align: center;">+</p> <p>A more relaxed policy could help deliver greater amounts of temporary agricultural workers accommodation.</p>	<p style="text-align: center;">+</p> <p>This approach would rely on national policy and consequently give less local control over accommodation for temporary agricultural workers. A more relaxed approach could help deliver greater amounts of temporary agricultural workers accommodation.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p style="text-align: center;">+</p> <p>This policy option could result in an increase in temporary workers in the area supporting employment needs and local rural economies.</p>	<p style="text-align: center;">+</p> <p>This approach would rely on national policy and consequently give less local control over accommodation for temporary agricultural workers. This policy option could result in an increase in temporary workers in the area supporting employment needs and local rural economies.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have little or no effect on this objective compared to the baseline. A more relaxed policy would give the Council less control over the location of this accommodation in Green Belt, potentially meaning it would be sited away from services and therefore there could be greater demand for transportation.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have no effect on this objective compared to the baseline. Relying on national policy would give the Council less control over the location of this accommodation in Green Belt, potentially meaning it would be sited away from services and therefore there could be greater demand for transportation.</p>

Topic	Option 1	Option 2	Option 3
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p style="text-align: center;">-</p> <p>This option would have a negative impact on the green belt and potentially agricultural land, as it could result in more accommodation being sited in these locations.</p>	<p style="text-align: center;">-</p> <p>This option could have a negative impact on the green belt, and potentially agricultural land, as it would rely on national policy and consequently give less local control over accommodation for temporary agricultural workers by requiring any area specific criteria to be met.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p style="text-align: center;">0 / -</p> <p>This option would be expected to have little or no effect on this objective compared to the baseline. However, a more relaxed policy could impact on the openness of the Green Belt.</p>	<p style="text-align: center;">0 / -</p> <p>This option would be expected to have little or no effect on this objective compared to the baseline. However, relying on national policy could impact on the openness of the Green Belt.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy RS5 and therefore would have a neutral effect on the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>

Summary

Option 1 is a continuation of current policy and therefore would have a neutral effect on the baseline position.

Option 2 would seek to relax the existing policy on Temporary Agricultural workers accommodation which could lead to weaker control and have negative impacts on a number of the objectives .

Option 3 would rely on National Green Belt / Countryside policy and give the Council less local control over accommodation for temporary agricultural workers, which would likely create negative effects on sustainability when compared to the current baseline.

Overall, Option 1 is considered to be the most sustainable approach.

HOUSING AND COMMUNITIES / HC02 – Place-Making

- Summary of ‘options’:**
1. A set of principles for good 'place-making' that should be followed wherever possible, both for new ('greenfield / large empty site) development, and for schemes within existing built-up areas or settlements.
 2. Have no Place Making policy.
 3. Have site-specific development briefs.
 4. Have a stronger policy.

Overview of current baseline: In the absence of an existing WLLP Policy, the current baseline is the NPPF, Chapter 12- Achieving well-designed places. It places the onus on the creation of high quality, beautiful and sustainable buildings and places being fundamental to what the planning and development process should achieve. It should create better places in which to live and work and help make development acceptable to communities.

Topic	Option 1	Option 2	Option 3	Option 4
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">++</p> <p>This policy approach will result in additional principles, including considering the health of residents / occupiers / visitors , along with dementia-friendly layouts, 'greener' places and promoting active travel which would all help further improve health and wellbeing., whilst pursuing '20 minute neighbourhoods' would help promote social inclusion., . This will go beyond the guidance within the NPPF and will therefore have a positive impact when considered against the existing baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents little or no effect compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>This policy approach would only apply place-making principles to specific development sites through site-specific development briefs. It would bring positive benefits to those sites but would fail to influence place-making on non-allocated sites. It would be expected to have a positive impact when considered against the baseline of National policy.</p>	<p style="text-align: center;">+ / -</p> <p>This approach would help support the creation of healthier places, and therefore would have a positive effect compared to the baseline. However, a stronger policy may stifle development where a single proposed principle is not achieved. This is considered to be less sustainable and would not encourage new and sustainable development in the borough.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Housing (Objective 7)	<p style="text-align: center;">+</p> <p>This approach would help support the creation of sustainable settlements, that can better address the needs of its residents, and therefore would have a positive effect compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents little or no effect compared to the baseline</p>	<p style="text-align: center;">+</p> <p>This option would assist in the development of specific sites within the borough and therefore would contribute to the delivery of well-designed and sustainable housing. However, by limiting the development briefs to specific sites, consistent development styles may be difficult to achieve across the borough. As such it is a minor positive impact when considered against the baseline.</p>	<p style="text-align: center;">+ / -</p> <p>This approach would help support the creation of sustainable settlements, that can better address the needs of its residents, and therefore would have a positive effect compared to the baseline. However, a stronger policy may stifle development where a single proposed principle is not achieved and may result in reduced delivery of housing sites.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents little or no effect compared to the baseline</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Transport (Objective 8)	<p style="text-align: center;">+</p> <p>This policy option would seek to encourage active travel within the borough and would also promote the '20-minute neighbourhood' concept. Therefore, this option would have a positive impact on active transport within the borough when compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents little or no effect compared to the baseline</p>	<p style="text-align: center;">+</p> <p>This policy approach would make a positive improvement to promoting active travel, however this would be only around the specific development sites listed. As such a minor positive impact would be seen.</p>	<p style="text-align: center;">+ / -</p> <p>This approach would help promote active travel, and seek to reduce car usage, and therefore would have a positive effect compared to the baseline. However, a stronger policy may stifle development where a single proposed principle is not achieved and may result in reduced delivery of housing sites.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents no effect compared to the baseline</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">+</p> <p>This policy option may make a positive contribution to new development maintaining or enhancing the local heritage and landscape of the borough through design principles. As such it is considered to make a positive impact when considered against the baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents no effect compared to the baseline</p>	<p style="text-align: center;">+</p> <p>As this policy option would only relate to a number of specific sites, the potential for good design would be site specific. As such a minor positive impact would be seen when compared to the existing baseline.</p>	<p style="text-align: center;">+ / -</p> <p>This approach could help enhance the local heritage and landscape of the borough through design principles, and therefore would have a positive effect compared to the baseline. However, a stronger policy may stifle development where a single proposed principle is not achieved and may result in reduced delivery of housing sites.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+</p> <p>This policy option would include principles promoting active travel, to reduce private vehicular use, and making 'greener' places. Such design improvements would have a positive impact on the Boroughs adaptation to and mitigation of climate change. As such it is considered to have a positive impact when compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents no effect compared to the baseline).</p>	<p style="text-align: center;">+</p> <p>As this policy option would only relate to a number of specific sites, the potential for climate mitigation would be site specific. As such a minor positive impact would be seen when compared to the existing baseline.</p>	<p style="text-align: center;">+ / -</p> <p>This approach could help the Borough better adapt and mitigate to climate change through a variety of design principles, and therefore would have a positive effect compared to the baseline .A stricter policy may stifle development, which in turn may result in the loss of climate mitigation opportunities for the borough.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Water quality and resources (Objective 12)	<p style="text-align: center;">+</p> <p>This policy option would include a principle which would relate to 'nature' which includes reference to water resources. As such it is considered to have a positive impact when compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents no effect compared to the baseline</p>	<p style="text-align: center;">+</p> <p>As this policy option would only relate to a number of specific sites, the potential to protect water resources would be site specific and not borough wide. As such a minor positive impact would be seen when compared to the existing baseline.</p>	<p style="text-align: center;">+ / -</p> <p>This approach could help the Borough better adapt and mitigate to climate change through a variety of design principles, and therefore would have a positive effect compared to the baseline. However, a stricter policy may stifle development, which in turn may result in the loss of water resource protection opportunities for the borough.</p>
Air quality (Objective 8)	<p style="text-align: center;">+</p> <p>This policy option would include principles promoting active travel, to reduce private vehicular use, and making 'greener' places which would, in turn, help improve air quality.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents no effect compared to the baseline</p>	<p style="text-align: center;">+</p> <p>As this policy option would only relate to a number of specific sites, the potential to improve air quality would be site specific and not borough wide. As such a minor positive impact would be seen when compared to the existing baseline.</p>	<p style="text-align: center;">+ / -</p> <p>This approach could help the Borough improve air quality and therefore would have a positive effect compared to the baseline. However, a stronger policy may stifle development where a single proposed principle is not achieved and may result in reduced delivery of housing sites.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Biodiversity (Objective 13)	<p style="text-align: center;">+</p> <p>This policy option would include a principle which would relate to 'nature' which includes reference to biodiversity. As such it is considered to have a positive impact when compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents no effect compared to the baseline</p>	<p style="text-align: center;">+</p> <p>As this policy option would only relate to a number of specific sites, the potential for biodiversity mitigation and ecological network improvements would be site specific. As such a minor positive impact would be seen when compared to the existing baseline.</p>	<p style="text-align: center;">+ / -</p> <p>This approach could help the Borough better enhance biodiversity, through a variety of design principles, and therefore would have a positive effect compared to the baseline. However, a stricter policy may stifle development, which in turn may result in the loss biodiversity improvement opportunities for the borough</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline. It would promote improved accessibility to services, through '20-minute neighbourhoods' but delivery of services are in the control of other policies.</p>	<p style="text-align: center;">0</p> <p>This policy option would rely on national policy. As such it is equivalent to the baseline position and therefore this option represents no effect compared to the baseline</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline. It would promote improved accessibility to services, through '20-minute neighbourhoods' but delivery of services are in the control of other policies.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline. It would promote improved accessibility to services, through '20-minute neighbourhoods' but delivery of services are in the control of other policies.</p>

Summary

Option 1 would be the most sustainable option as it would promote good, sustainable design for development across the borough and would result in positive impacts for the majority of the objectives.

Option 2 would seek to continue to follow the existing National Policy approach and therefore would have a neutral effect on the existing baseline position.

Option 3 would be delivered in a site-specific manner therefore the positive benefits would not be felt borough wide, and so it is not the most sustainable of the options.

Option 4 is a stronger policy and so in principle could deliver the largest benefits to sustainability. However, a stricter policy could potentially stifle development due to being overly restrictive.

Overall, Option 1 is considered the most sustainable.

HOUSING AND COMMUNITIES / HC03 – Preserving and utilising our heritage

- Summary of ‘options’:**
1. A policy to preserve and enhance the Borough's cultural and heritage assets
 2. Do not have a heritage policy (rely on national policy)
 3. Have a very prescriptive policy

Current baseline: The NPPF sets out the importance of conserving the historic environment. WLLP Policy EN4 then locally guides the preservation and enhancement West Lancashire's cultural and heritage assets.

Option 1 therefore represents the current baseline position.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This is the option most aligned to the baseline / current policy. This option would have little or no effect on this objective, except to say that cultural and heritage assets can help create attractive environments which enhance health and wellbeing.</p>	<p style="text-align: center;">-</p> <p>This option would remove a local policy relating to culture and heritage assets and result in the Council having a weaker control over their management. As these assets can help create attractive environments that can enhance health and wellbeing, less control could negatively affect quality of life.</p>	<p style="text-align: center;">-</p> <p>This option would lead to tighter control over cultural and heritage assets compared to the current baseline but would lead to a more inflexible approach. This can often make it harder to protect cultural and heritage assets, which can often enhance health and wellbeing.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>

Topic	Option 1	Option 2	Option 3
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This is the option most aligned to the current policy. This option would continue the current approach, so, in comparison with the current baseline, it would be unlikely to affect this objective.</p>	<p style="text-align: center;">-</p> <p>This approach would rely solely on national policy to protect the historic environment from inappropriate development. It would mean more varied development would be allowed, which could affect the Borough's historic and cultural environment.</p>	<p style="text-align: center;">+ / -</p> <p>This approach would introduce significantly greater control over the design of development affecting the Borough's heritage assets, going beyond national policy. Whilst it would provide tighter, more prescriptive control over cultural and heritage assets, this inflexibility can make it harder to preserve and enhance those assets.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>

Topic	Option 1	Option 2	Option 3
Air quality (Objective 8)	0 This option would have little or no effect on this objective	0 This option would have little or no effect on this objective	0 This option would have little or no effect on this objective
Biodiversity (Objective 13)	0 This option would have little or no effect on this objective	0 This option would have little or no effect on this objective	0 This option would have little or no effect on this objective
Local services and community infrastructure (Objectives 3 and 8)	0 This option would have little or no effect on this objective	0 This option would have little or no effect on this objective	0 This option would have little or no effect on this objective

Summary

Option 1 is the option most aligned to the current policy, and would just continue the baseline approach to preserve and enhance the Borough's cultural and heritage assets

Option 2 would remove a local policy to rely solely on national policy to protect the historic environment from inappropriate development. This may allow more varied development, which could detrimentally affect the Borough's historic and cultural environment.

Option 3 would lead to tighter, more prescriptive control over cultural and heritage assets, compared to the current baseline, but would lead to a more inflexible approach. This can often make it harder to preserve or enhance cultural and heritage assets.

Overall, Option 1 is considered the most sustainable.

HOUSING AND COMMUNITIES / HC04 – COMMUNITY FACILITIES

- Summary of ‘options’:**
1. A flexible approach to maintain some control over community facilities. This would let the market and community decide what facilities should be delivered and where but would have measures to help control the unnecessary loss of services.
 2. Guide development in relation to specific development sites or infrastructure types. This would set out in detail which community facilities should be provided or protected in different locations across the Borough.
 3. Do nothing to control the provision or loss of community facilities and rely on national policy instead.

Overview of current baseline: The baseline is represented by two Local Plan policies and the NPPF. Local Plan Policies IF1 and IF3 deal with community facilities. IF1 indicates that the loss of such facilities within centres will be resisted unless the facility is no longer needed, or the services provided by it can be served in a suitably accessible alternative location. Policy IF3 deals with community facilities more generally in terms of both new provision and their loss (including open space). Loss will be resisted unless it can be shown that the facility is no longer needed or can be relocated to an equally accessible location. The NPPF is also relevant and indicates that community facilities should be positively planned for and their unnecessary loss resisted. It also states that they should be retained to support the rural economy.

Whilst none of the policy options exactly reflect the baseline position, option 1 represents the closest to it.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This option would have minimal effect in relation to this topic as it would closely reflect the baseline position.</p>	<p style="text-align: center;">+ / -</p> <p>This policy option would have a positive effect in relation to this topic compared to the baseline. By guiding development and setting out in detail which community infrastructure facilities should be provided and protected it could better facilitate the provision of services for the elderly and potentially reduce health inequalities. It would provide focussed opportunities to protect or enhance areas of public open and recreational space thus supporting physical and mental health improvement and encouraging healthier lifestyles. This prescriptive approach could better ensure that specific services are located in the most accessible areas. However, it would be less responsive to changing needs and local demands.</p>	<p style="text-align: center;">-</p> <p>This policy option would have a negative effect on the topic compared to the baseline. It would not facilitate the provision of services for the elderly, would not improve quality of life in deprived areas and for deprived groups and would potentially increase health inequalities. These matters could be addressed, to some extent, by national planning advice but in a more piecemeal manner.</p> <p>This option would not provide opportunities to enhance areas of public open and recreational space, and Green Infrastructure, so to support opportunities for physical and mental health improvement and therefore encourage healthier lifestyles. Nevertheless, this matter would be addressed by other policy options within the Plan. Additionally, national planning advice seeks to protect such open space.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have minimal effect in relation to this topic as it would closely reflect the baseline position.</p>	<p style="text-align: center;">+</p> <p>This policy option would have a positive effect in relation to this topic compared to the baseline. The option's focussed approach could be used to retain or promote access to, and provision of, services in rural areas.</p>	<p style="text-align: center;">-</p> <p>This policy option would have a negative effect on the topic compared to the baseline, primarily because it would not promote access to, and provision of, services in rural areas. Whilst national policy would seek to retain accessible local services and community facilities in order to support the rural economy, this could be expected to be on more of a piecemeal basis.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option may have some effects on this topic compared to the baseline, potentially in terms of encouraging the use of brownfield land in preference to greenfield land. However, this is likely to be limited to when other Plan policies on development sites are taken into account.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option could help reduce or manage flood risk by guiding development to specific sites. However, this is likely to be limited when other Plan policies dealing with development sites are also taken into account.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have minimal effect in relation to this topic as it would closely reflect the baseline position.</p>	<p style="text-align: center;">+ / -</p> <p>This policy option would have a positive effect on the topic compared to the baseline. It would potentially improve the quantity and quality of, and access to, areas of open and recreational space, and to Green Infrastructure and would therefore encourage healthier lifestyles and assist in reducing health inequalities. This prescriptive approach could better ensure that specific services are located in the most accessible areas. However, it would be less responsive to changing needs and local demands.</p>	<p style="text-align: center;">-</p> <p>This policy option would have a negative effect on the topic compared to the baseline. It would not improve the quantity and quality of, and access to, areas of open and recreational space, and to Green Infrastructure and would therefore not encourage healthier lifestyles. It would also not assist in reducing health inequalities.</p>

Summary

Option 1 closely resembles the baseline situation so would have a neutral effect overall in relation to sustainability.

Option 2 is more detailed and geographically focused, and would have positive effects in relation to population, health and social inclusion, local economy and employment and local services and community infrastructure topics. However, it would be more inflexible to changing / future needs of communities and market demand.

Option 3 proposes no policy, instead relying upon national planning advice and market forces, so is inferior to the baseline as it could be expected to act on a more piecemeal basis. As such, negative effects have been identified in relation to the population, health and social inclusion, local economy and employment and local services and community infrastructure topics.

On balance, Options 1 is considered the most sustainable because of its flexibility to future changing demands.

ECONOMY & EMPLOYMENT / EE01 – EMPLOYMENT AREAS

- Summary of ‘options’:**
1. Update and amend the existing policy. Reduce the number of existing 'core / traditional' employment areas. Identify business sectors that it would be desirable for the Borough to diversify towards. Outside the 'core' employment areas, allow a wider range of commercial uses in line with changes to the national Use Classes Order, e.g. shops. Set out when these areas could be redeveloped for non-commercial uses e.g. housing. (Additional employment areas for the new Local Plan period would be allocated under a different policy.)
 2. Update the existing policy in a limited way to reflect the new amount of land needed for employment uses over the Local Plan period, as well as changes to the Use Classes Order.
 3. Zone areas for a wide range of economic activities. Within these zones, there would be limited planning controls in order to encourage business growth akin to the former national Enterprise Zones.

Current baseline: WLLP Policy EC1 sets out how much employment land is to be provided and designates three types of employment land around West Lancashire, affording to each varying levels of protection. National policy is set out in the NPPF and the recently revised Use Classes Order, allowing more flexibility in changing between certain employment uses and other commercial uses.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>Whilst it could be argued that allowing for a greater diversity of uses on some employment sites under the preferred new policy could lead to additional jobs / better prospects when applying for jobs, this change comes as a result of changes to national policy, which is part of the baseline position. As such, this option represents no net change relative to the baseline.</p>	<p style="text-align: center;">0</p> <p>As for Option 1, whilst it could be argued that allowing for a greater diversity of uses on some employment sites under this policy option could lead to additional jobs / better prospects when applying for jobs, this change comes as a result of changes to national policy, part of the baseline position. As such, this option represents no net change relative to the baseline.</p>	<p style="text-align: center;">0 / +</p> <p>Setting up 'Zones' with limited planning controls in order to encourage business growth should in theory result in more jobs and better prospects for those applying for jobs. It would remain to be seen whether this growth would come at the expense of other employment areas in the Borough or whether it is additional investment compared to the baseline. No change / net positive change.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This policy option will have no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have no effect compared to the baseline for this objective.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>As for the Population, Health and Social Inclusion objective (above), it could be argued that allowing for a greater diversity of uses on employment sites could lead to additional jobs and / or a wider range of jobs under the preferred new policy, but this change stems from national policy which is part of the baseline position. Reducing the number of 'core' employment areas that are protected for 'traditional' employment uses may lead to fewer such jobs, but these would most likely be replaced with more diverse jobs. Allowing changes from employment uses to housing could lead to a loss in jobs, but again this stems from national policy, part of the baseline position.</p> <p>Overall, this option represents no net change relative to the baseline.</p>	<p style="text-align: center;">0</p> <p>As for Option 1, it could be argued that allowing for a greater diversity of uses on employment sites could lead to additional jobs and / or a wider range of jobs under the preferred new policy, but this change stems from national policy which is part of the baseline position.</p> <p>No change relative to the baseline position.</p>	<p style="text-align: center;">0 / + / ?</p> <p>Setting up 'Zones' in which there would be limited planning controls in order to encourage business growth should in theory result in more jobs and better employment opportunities compared to the baseline position. Whether other benefits under this objective would be achieved depends on the location of the 'Zones' and how they relate to deprived areas, town centres, etc. It would remain to be seen whether this growth would come at the expense of other employment areas (e.g. business relocating from elsewhere in West Lancashire as opposed to moving into the Borough).</p> <p>No change or net positive change relative to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option should have little or no effect compared to the baseline position. Improved transport networks / improvements for opportunities for sustainable and active travel to employment areas would be achieved through transport and health policies rather than through this policy.</p>	<p style="text-align: center;">0</p> <p>This option should have little or no effect compared to the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option should have little or no effect compared to the baseline position. Effects on travel patterns, etc. will depend on the location of the specific 'Zones'.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>Overall, there should be little or no change under this SA objective relative to the baseline. Allowing for a greater diversity of uses on some employment areas may lead to less vacant or derelict land, and may encourage brownfield redevelopment, but these changes are as a result of national policy which forms part of the baseline position.</p>	<p style="text-align: center;">0</p> <p>Overall, there should be little or no change under this SA objective relative to the baseline. Allowing for a greater diversity of uses on some employment areas may lead to less vacant or derelict land, and may encourage brownfield redevelopment, but, as for Option 1, these changes are as a result of national policy which forms part of the baseline position.</p>	<p style="text-align: center;">0 / - / +</p> <p>Overall, there should be little or no change under this SA objective relative to the baseline. Whether it leads to less derelict land and greater or lesser take-up of brownfield land depends on the location of the 'Zones' and whether these sites are brownfield or greenfield.</p>
Cultural heritage and landscape landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This policy option should result in no, or negligible, change relative to the baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option should result in no, or negligible, change relative to the baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option should result in no, or negligible, change relative to the baseline. Presumably any 'Zones' would not be located in areas where they harm the landscape or historic environment.</p>

Topic	Option 1	Option 2	Option 3
Climate change / the climate emergency, energy & flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This policy option should result in no, or negligible, change relative to the baseline. Whilst different new employment uses could lessen the need for carbon-based energy generation or use, and could have improved resilience to the likely effects of climate change, this would be achieved through other Local Plan policies, not this one.</p>	<p style="text-align: center;">0</p> <p>This policy option should result in no, or negligible, change relative to the baseline position.</p>	<p style="text-align: center;">0</p> <p>This policy option should result in no, or negligible, change relative to the baseline position. There is the possibility that new buildings could be energy-efficient and / or zero carbon, but the same could be said for new development under Options 1 and 2.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This policy option should result in little or no change relative to the baseline for this objective. Improvements in relation to water quality and resources would be achieved through other policies.</p>	<p style="text-align: center;">0</p> <p>This policy option should result in little or no change relative to the baseline position for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option should result in little or no change relative to the baseline position for this objective.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This policy option should result in no, or negligible, change relative to the baseline for this objective. Whilst new, different employment uses could change levels or patterns of congestion, air quality, and greenhouse gas emissions, these would come as a result of national policy (which is part of the baseline position), regardless of whether or not this policy option were pursued.</p>	<p style="text-align: center;">0</p> <p>This policy option should result in no, or negligible, change relative to the baseline position for this objective.</p>	<p style="text-align: center;">0</p> <p>As for Options 1 and 2, this policy option should result in no, or negligible, change relative to the baseline position for this objective.</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p>0</p> <p>This policy option would be expected to result in minimal or no change relative to the baseline.</p>	<p>0</p> <p>This policy option would be expected to result in minimal or no change relative to the baseline position for this objective.</p>	<p>0</p> <p>This policy option would be expected to result in minimal or no change relative to the baseline position for this objective.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p>0</p> <p>Allowing for a wider variety of uses on certain employment sites could improve people's access to certain services (equally, it could make access less good), but once again the policy that allows such changes is a national policy that forms part of the baseline position. Therefore no overall change relative to the baseline.</p>	<p>0</p> <p>As for Option 1, allowing for a wider variety of uses on certain employment sites could improve people's access to certain services (or could make access less good for other services), but the policy that allows such changes is a national policy that forms part of the baseline position. No change overall relative to the baseline.</p>	<p>0 / ?</p> <p>Whether or not this option results in easier access to services compared to the baseline position depends on the location of any 'Zones' and how easily accessible they are by active and sustainable transport modes.</p>

Summary

Option 1 is judged to have no net effect relative to the baseline position. This is because it either carries on with the current Local Plan approach, or else makes changes that are in line with national policy. The current Local Plan and national policy represent the baseline.

Option 2 is also judged to have no net effect relative to the baseline position for similar reasons to Option 1.

Option 3 could have positive effects relative to the baseline position on three of the sustainability appraisal 'topic areas' but these depend on the location of the 'Zones' being in appropriate places and the occupants of the 'Zones' moving into the Borough from outside, rather than relocating within the Borough.

Overall, if these criteria were met, Option 3 could be considered the most sustainable; otherwise all options are similar to the baseline position.

ECONOMY & EMPLOYMENT / EE02 – RURAL ECONOMY

Summary of 'options':

1. This option would be a little less restrictive than existing Local Plan policy. It would promote the protection of the countryside; would seek to protect viable existing rural employment, agricultural, tourist and visitor uses; 'employment uses' definition would include all job-creating uses. There would be specific rural development site allocation(s). Expansion / diversification of rural businesses would be encouraged at an appropriate scale. Development of best quality agricultural land would only be permitted where absolutely necessary.
2. Continue with existing Local Plan policy, i.e. protect the best quality agricultural land, protect existing rural employment sites and re-use existing buildings where they would be left vacant; allow rural business growth in certain circumstances; promote tourism of an appropriate scale.
3. Increased development in rural areas. This would entail the allocation of a greater quantity of land in rural areas for employment purposes. This may provide new opportunities for agricultural produce packing and distribution facilities and / or for rural technology hubs. It would support visitor attractions and larger scale commercial uses, for example larger farm shops.

Overview of current baseline:

As per Option 2 above, WLLP policy EC2 protects the best quality agricultural land and existing rural employment sites; it allows for re-use of existing buildings where they would be left vacant; it allows for rural business growth in certain circumstances; it promotes tourism of an appropriate scale. National policy is set out in the NPPF and further clarification provided in Planning Practice Guidance.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>By allowing a greater variety of job-creating / job-sustaining uses in rural areas, this option could result in a minor positive change compared to the baseline in terms of improving people's chances of success in applying for jobs (as there would be the potential for a greater number of jobs).</p>	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>By allocating more land in rural areas for employment, this option could result in a minor positive change compared to the baseline in terms of improving people's chances of success in applying for jobs (as there would be the potential for a greater number of jobs).</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This policy option will have no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline (see comment on first Topic above).</p>	<p style="text-align: center;">0</p> <p>This policy option will have no effect compared to the baseline for this objective.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">+</p> <p>By allowing for a wider variety of employment uses in rural areas (and therefore more job opportunities, access to jobs, economic benefits, rural diversification, economic growth of villages and smaller settlements), this policy option should have a positive effect compared to the baseline position.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline (see comment on first Topic above).</p>	<p style="text-align: center;">+</p> <p>This option allocates more land for rural employment and therefore should result in more job opportunities, better access to jobs in rural area, more rural economic benefits, rural diversification and economic growth of villages and smaller settlements. This policy option would therefore be expected to have a positive effect compared to the baseline position.</p>

Topic	Option 1	Option 2	Option 3
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any noticeable effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline (see comment on first Topic above).</p>	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any significant effect compared to the baseline. There could be small improvements to the transport network (e.g. from Section 106 agreements); equally there could be disbenefits e.g. more rural traffic and more greenhouse gas emissions.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This policy option seeks to protect best and most versatile agricultural land, but so does the baseline policy position. No net effect.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline (see comment on first Topic above).</p>	<p style="text-align: center;">0 / -</p> <p>An increased amount of land allocated for rural employment could result in the loss of agricultural land and / or soil, and therefore a negative effect compared to the baseline, but this depends on where sites are allocated. If vacant, derelict and / or brownfield land were used, there could be no net effect, or even a positive effect.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any effect compared to the baseline for this objective, given the baseline position is a very similar policy.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline (see comment on first Topic above).</p>	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any effect compared to the baseline for this objective, unless a site were allocated in an incongruous or sensitive location (which is unlikely).</p>

Topic	Option 1	Option 2	Option 3
Climate change / the climate emergency, energy & flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any effect compared to the baseline for this objective, given the baseline position is a very similar policy.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline (see comment on first Topic above).</p>	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any significant net effect compared to the baseline for this objective.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any effect compared to the baseline for this objective, given the baseline position is a very similar policy.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline (see comment on first Topic above).</p>	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any significant net effect compared to the baseline for this objective. Any effects depend on the details of where sites are allocated and how their occupiers use water.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any effect compared to the baseline for this objective, given the baseline position is a very similar policy.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline (see comment on first Topic above).</p>	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any effect compared to the baseline for this objective; effects would depend on the occupiers and the nature of their business(es).</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any effect compared to the baseline for this objective, as the baseline position is a very similar policy.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline (see comment on first Topic above).</p>	<p style="text-align: center;">0</p> <p>This policy option is unlikely to have any significant net effect compared to the baseline for this objective.</p>

Topic	Option 1	Option 2	Option 3
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>Whilst allowing for a greater variety of employment uses in rural areas and therefore, in theory, easier access to services for some rural residents, this policy option is unlikely to have any significant effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline (see comment on first Topic above).</p>	<p style="text-align: center;">0</p> <p>This option should result in a greater amount of employment in rural areas and therefore, in theory, easier access to services for some rural residents. However, overall, this policy option is unlikely to have any significant effect compared to the baseline for this particular objective.</p>

Summary

Option 1 is similar to current policy (and therefore the baseline position), although it allows for a wider variety of employment uses in rural areas which could result in more jobs and an improvement in the rural economy.

Option 2 represents a continuation of current policy, and thus a continuation of the baseline position.

Option 3 allocates more land for rural employment and should have economic and possibly minor (social) benefits compared to the baseline but could also result in environmental disbenefits.

Overall, Option 1 is considered the most sustainable given its expected positive effects and lack of negative effects compared to the baseline position, although option 3 could also be considered sustainable if negative effects are avoided (e.g. by allocating the extra sites on non-sensitive brownfield land).

ECONOMY AND EMPLOYMENT / EE03 – TOWN CENTRES

Summary of ‘options’:

1. **One overarching policy for centres, with additional supporting policies / strategies for Burscough, Ormskirk and Skelmersdale centres.** *The overarching policy would include the centre hierarchy, the requirements for sequential and impact assessments, the approach towards deciding uses that would be permitted in centres, and when new stand-alone local convenience stores would be permitted. Development will need to be of an appropriate scale to the centre to which they relate and there would be a focus upon Skelmersdale to support the regeneration of the town. The policy would have local interpretations of the sequential approach and retail impact with minor variations from the national norm.*
Proposals for new uses within centres would be considered in relation to their contribution towards commercial activity including having a pedestrian level shop front, being open for at least part of the day and whether the use would be one typically found in a town centre, etc.
A healthy eating and drinking policy would be separate from this policy.
2. **Minimal changes to WLLP policy IF1:** a single policy for all town centres; minimum amendments to IF1, i.e. the removal of the requirement for a minimum of 70% retail uses within primary shopping areas of town centres due to changes to the Use Classes Order. The policy would deal with the centre hierarchy, the requirements for sequential and impact assessments, and permitted uses in centres.
3. **One single general policy (similar to the preferred approach) in relation to centres and appropriate uses but no additional and separate policies for Burscough, Ormskirk, and Skelmersdale town centres.**
4. **One overarching policy in relation to centres and appropriate uses with additional supporting policies** for Burscough, Ormskirk and Skelmersdale town centres, but without a separate healthy eating and drinking policy - these matters (as much as they could be) would be dealt with through this town centre policy (meaning that matters such as distance of takeaways from schools wouldn't be dealt with).

Overview of current baseline:

The baseline policy position comprises WLLP policy IF1: Maintaining Vibrant Town and Local Centres, and national policy, which includes recent amendments to the Use Classes Order and permitted development rights. The general situation has been affected by Covid and the accelerated growth in online retailing.

Topic	Option 1	Option 2	Option 3	Option 4
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This option, whilst indirectly contributing towards some of the sub-criteria for this topic area, would not represent any material change compared to the baseline position (which comprises national policy and a not significantly dissimilar current Local Plan policy). The healthy eating policy is assessed separately.</p>	<p style="text-align: center;">0</p> <p>As with option 1, this option, whilst indirectly contributing towards some of the sub-criteria for this topic area, would not represent any material change compared to the baseline position (which includes an almost identical current Local Plan policy). The healthy eating policy is assessed separately.</p>	<p style="text-align: center;">0</p> <p>As with option 1, this option, whilst indirectly contributing towards some of the sub-criteria for this topic area, would not be expected to represent any material change compared to the baseline position. Including the healthy eating policy may improve matters in town centres but having no policy for take-aways near schools would be a negative consequence, although this is the current baseline position (no policy at present). Thus no significant change overall.</p>	<p style="text-align: center;">0</p> <p>As with option 1, this option, whilst indirectly contributing towards some of the sub-criteria for this topic area, would not be expected to represent any material change compared to the baseline position. Including the healthy eating policy may improve matters in town centres but having no policy for take-aways near schools would be a negative consequence, although this is the current baseline position (no policy at present). Thus no significant change overall.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>As above, this option could contribute towards the sub-criteria for this topic area as some housing would be permitted in town centres, but would not represent any material change compared to the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would not represent any material change compared to the baseline position given its similarity to the current Local Plan policy.</p>	<p style="text-align: center;">0</p> <p>This option could contribute towards the sub-criteria for this topic area as some housing would be permitted in town centres, but would not be expected to represent any material change compared to the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option could contribute towards the sub-criteria for this topic area as some housing would be permitted in town centres, but would not be expected to represent any material change compared to the baseline position.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Local Economy and Employment (Objectives 4-6)	<p>0</p> <p>This option could contribute indirectly towards some of the sub-criteria for this topic area (for example a separate policy focus upon Skelmersdale should help economic regeneration there), but would not represent any material change compared to the baseline position.</p>	<p>0</p> <p>This option would not represent any material change compared to the baseline position given its similarity to the current Local Plan policy. The removal of the '70% retail units' requirement could have both positive and negative effects, but is necessary given current policy / circumstances.</p>	<p>0 / -</p> <p>Lack of a Skelmersdale-focused policy may result in negative effects for the town, so less tackling of inequalities compared to the baseline. Otherwise, this option would not be expected to represent any material change compared to the baseline position.</p>	<p>0</p> <p>This option could contribute indirectly towards some of the sub-criteria for this topic area (for example a policy focus upon Skelmersdale should help economic regeneration there), but would not represent any material change compared to the baseline position.</p>
Transport (Objective 8)	<p>0</p> <p>This option would be expected to have minimal direct effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would not represent any material change compared to the baseline position given its similarity to the current Local Plan policy.</p>	<p>0</p> <p>This option would be expected to have minimal direct effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would be expected to have minimal direct effects under this topic area compared to the baseline position.</p>
Land Resources (Objective 9)	<p>0</p> <p>This policy framework for town centre proposals could help support brownfield redevelopment and reduce vacant 'land'. Overall, however, this option would be expected to have minimal effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would not represent any material change compared to the baseline position given its similarity to the current Local Plan policy.</p>	<p>0</p> <p>This option would be expected to have minimal overall effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would be expected to have minimal overall effects under this topic area compared to the baseline position.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Cultural heritage and landscape (Objective 10)	<p>0</p> <p>Contributions towards built environment quality would come from design policies. Thus this option would have minimal effects compared to the baseline position.</p>	<p>0</p> <p>This option would not represent any material change compared to the baseline position given its similarity to the current Local Plan policy.</p>	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>
Climate change / climate emergency, energy and flooding (Objective 11)	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would not represent any material change compared to the baseline position given its similarity to the current Local Plan policy.</p>	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>
Water quality and resources (Objective 12)	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>
Air quality (Objective 8)	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>	<p>0</p> <p>This option would be expected to have minimal effects under this topic area compared to the baseline position.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Biodiversity (Objective 13)	0 This option would be expected to have minimal, if any, effects under this topic area compared to the baseline position.	0 This option would be expected to have minimal effects under this topic area compared to the baseline position.	0 This option would be expected to have minimal effects under this topic area compared to the baseline position.	0 This option would be expected to have minimal effects under this topic area compared to the baseline position.
Local services and community infrastructure (Objectives 3 and 8)	0 Whilst a town centre policy should help maintain or increase people's access to services, this option would be expected to have minimal effects under this topic area compared to the baseline position as the baseline policy is similar.	0 This option would not represent any material change compared to the baseline position given its similarity to the current Local Plan policy.	0 / - Not having a specific Burscough, Ormskirk or Skelmersdale focus may possibly in theory lead to fewer services there compared to the baseline, but these differences would be expected to be minor.	0 Whilst a town centre policy should help maintain or increase people's access to services, this option would be expected to have minimal effects under this topic area compared to the baseline position, which has a similar policy approach.

Summary

Option 1, which covers similar matters to current Local Plan policy IF1 and which is consistent with national policy (i.e. the baseline position), represents no change overall with regard to the baseline position. It scores positively against some sub-criteria, as does the baseline position.

Option 2 also represents no change overall with regard to the baseline position, given its similarity to current WLLP policy IF1.

Option 3 has a couple of minor negative effects compared to the baseline on account of there being no Skelmersdale, Ormskirk or Burscough-specific policy, which could result in less regeneration of Skelmersdale town centre, or a narrower distribution of services.

Options 3 and 4 have no policy for distance of take-away from schools (outside town centres), which would represent a negative effect relative to the baseline as far as health is concerned for areas outside of town centres, but a positive effect for town centre areas.

Overall, option 1 is considered the most sustainable, having no negative effects relative to the baseline position, followed by option 2.

ECONOMY AND EMPLOYMENT / EE04A – SKILLS & EDUCATION

Summary of 'options':

1. **Support the continued development and improvement of Edge Hill University campus** and its facilities, including new purpose built student residential accommodation. Any growth beyond the existing campus would be either close by to the south of St Helens Road or within Ormskirk town centre. Require travel plans and parking strategies. to encourage sustainable travel, improve access to the campus and alleviate existing or new traffic impacts. Encourage links between the University and local businesses (information sharing and learning programmes) and seek benefits to more deprived local communities.

(HMOs and off-campus student accommodation would be dealt with separately under the Housing topic.)
2. **Have no policy for the University campus.** The future development of the University would not be guided by a site specific policy meaning that such development may be more likely to take place away from the existing campus. Future development on campus may also be less able to be managed in terms of mix and quality.
3. **A more detailed policy or masterplan for the University campus.** This would tightly control what is developed on-campus and where. This may reduce the flexibility for the University to respond to changing demands within the higher education sector.
4. **A different location for the expansion of the University campus** - a satellite campus elsewhere in Ormskirk or further afield in West Lancashire rather than expanding within or close to the existing campus. It would create additional movement of students between the main campus and satellite campus and would be less likely to provide as much purpose built student accommodation thus resulting in student housing pressures in Ormskirk.
5. **A policy to deal with the future of Edge Hill University and other education sites** (schools, higher / further education). The policy would expand to provide a broad policy framework for their future development. This would be challenging both in terms of the scope of which education facilities to include or exclude and the flexibility a policy framework would require in order to deal with a range of different sites effectively.

Overview of current baseline:

The current Local Plan has a policy on Edge Hill University ('EHU'), supporting its growth within the Campus and allocating former Green Belt land for expansion (now developed). It seeks 'where possible' to ensure the University's benefits are future growth are directed to communities where educational attainment is lower.

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Population, Health and Social Inclusion (Objectives 1-3)	<p>0 / +</p> <p>This option may have some positive effects in terms of participation in education through EHU linking with local businesses, although these would be minor relative to the baseline as existing policy is similar. Students would remain located close to health services and the town centre, supporting social inclusion.</p>	<p>? / -</p> <p>It is unclear what the effect of having no EHU policy would be. It is likely that effects for this topic area would be negative relative to the baseline (e.g. which encourages EHU linking with and benefitting the community).</p>	<p>0</p> <p>This option should be similar to the baseline position in that any EHU development would be required to benefit the local area. However, constraints on future EHU growth and flexibility could limit these benefits longer-term.</p>	<p>+ / - (?)</p> <p>A satellite campus could spread economic benefits beyond Ormskirk and, if policy requires benefits to be shared with the community, this could result in positive social inclusion effects relative to the baseline. However, student housing pressures in Ormskirk could increase, which could possibly lead to negative effects.</p>	<p>+</p> <p>This option should have positive effects relative to the baseline in terms of participation in education, enabling skills progression, and developing the Borough's knowledge base.</p>
Housing (Objective 7)	<p>0</p> <p>No change relative to the baseline as off-campus student accommodation would be dealt with under a separate [housing] policy. Presumably, on-campus accommodation would cater for extra students resulting from EHU expansion, so would not exacerbate or help meet <i>existing</i> needs.</p>	<p>0</p> <p>No change relative to the baseline as off-campus student accommodation would be dealt with under a separate [housing] policy. Presumably, on-campus accommodation would cater for extra students resulting from EHU expansion, so would not exacerbate or help meet <i>existing</i> needs.</p>	<p>0</p> <p>Off-campus student accommodation would be dealt with under a separate [housing] policy. This option may result in less accommodation provided on campus, but this meets the needs of the student population only rather than general housing needs, so no change relative to the baseline.</p>	<p>-</p> <p>This option would be less likely to provide as much purpose-built student accommodation which could result in extra student housing pressures compared to the baseline.</p>	<p>0</p> <p>This policy option should have no effect relative to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Local Economy and Employment (Objectives 4-6)	<p>+</p> <p>This option could result in minor positive effects compared to the baseline as it allows for the expansion of EHU so there would be some extra direct and knock-on economic growth as a result.</p>	<p>0 / -</p> <p>Overall, no change / minor negative change relative to the baseline. EHU may expand and provide economic growth, but there would be no requirement to seek to benefit the local community / businesses, etc as under current policy.</p>	<p>0 / -</p> <p>Overall, no change or minor negative change relative to the baseline. EHU may not expand to the same extent as under option 1, which limits the possibility of knock-on benefits to the local community / businesses.</p>	<p>+</p> <p>A satellite campus could bring economic benefits to other parts of the Borough. If it is required for benefits to be shared with the community (as with baseline policy), this could result in positive effects relative to the baseline.</p>	<p>+</p> <p>This option should have minor positive effects relative to the baseline as a positive framework for development of education facilities should result in knock-on economic benefits. Given the effects are indirect, they are not expected to be significant with regard to this topic area.</p>
Transport (Objective 8)	<p>0 / -</p> <p>An expanded EHU would presumably generate more traffic relative to the baseline, but travel plans would be designed to encourage sustainable travel. No change, or minor negative change relative to the baseline.</p>	<p>-</p> <p>An expanded EHU would presumably generate more traffic relative to the baseline. There would be no requirement for travel plans under this policy to mitigate negative effects, therefore negative relative to the baseline.</p>	<p>0 / -</p> <p>An expanded EHU would presumably generate more traffic relative to the baseline, but travel plans would be designed to encourage sustainable travel. No change, or minor negative change relative to the baseline.</p>	<p>-</p> <p>Having a satellite campus could create additional movement of students between campuses, so more journeys relative to the baseline. These could be mitigated to an extent through sustainable travel plans.</p>	<p>0 / ?</p> <p>It is unclear what effects this option would have on transport. For schools and colleges, it is most likely there would be no net effects relative to the baseline. For EHU, effects would depend on the framework for future growth and where this would be.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Land Resources (Objective 9)	<p>- (/+?)</p> <p>Expanding the EHU campus south of St Helens Road would lead to loss of greenfield / agricultural land. Alternatively, land used in Ormskirk Town Centre could be brownfield. Overall, effects are more likely to be negative compared to the baseline.</p>	<p>- / ?</p> <p>If EHU were to expand under this option, it is not known where the expansion would take place. Effects on land are more likely to be negative relative to the baseline, which sets out where new development would happen.</p>	<p>0</p> <p>As growth of EHU would be limited to the campus and tightly controlled, this should not result in any loss of greenfield or agricultural land or soil. No change relative to the baseline.</p>	<p>0 / - / + (?)</p> <p>Having a satellite campus would mean extra land-take. The effects could be negative or neutral (even positive) relative to the baseline depending on whether the satellite campus is on greenfield or brownfield / derelict land.</p>	<p>0 / ?</p> <p>As above, effects on this topic area are unclear but it would be expected that they would be zero relative to the baseline for schools / colleges, and for EHU the effects would depend on the framework for future growth.</p>
Cultural heritage and landscape (Objective 10)	<p>0 / -</p> <p>Developing land south of St Helens Road could lead to negative effects on the landscape compared to the baseline position. These could be reduced or even neutralised through high quality design and screening, etc.</p>	<p>0 / ?</p> <p>If EHU were to expand under this option, it is not known where the expansion would take place. Presumably, effects on heritage would be controlled by other policies. Likely effects on landscape are unclear.</p>	<p>0</p> <p>This option, confining new development to the existing EHU campus, should have no effect relative to the baseline.</p>	<p>0 / - (?)</p> <p>The effects of this option relative to the baseline depend on where any satellite campus is located. It is most likely that a campus would be within an existing settlement rather than in a sensitive landscape / heritage area.</p>	<p>0 / ?</p> <p>Overall, no net effects expected relative to the baseline. Effects relating to EHU depend on the framework for future growth and where this might take place.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Climate change / the climate emergency, energy and flooding (Objective 11)	<p>0</p> <p>This option is unlikely to have any material effect on this topic area relative to the baseline position.</p>	<p>0</p> <p>This option is unlikely to have any material effect on this topic area relative to the baseline position.</p>	<p>0</p> <p>This option is unlikely to have any material effect on this topic area relative to the baseline position.</p>	<p>?</p> <p>Effects depend where any satellite campus is located. Presumably, flood risk areas would be avoided; new buildings could be low or zero carbon and energy-efficient.</p>	<p>0</p> <p>This option is unlikely to have any material effect on this topic area relative to the baseline position.</p>
Water quality and resources (Objective 12)	<p>0</p> <p>This option is unlikely to have any material effect on this topic area relative to the baseline position. Presumably sustainable drainage systems would be used for new development.</p>	<p>?</p> <p>It is unclear what effects this option would have on water quality and resources relative to the baseline position; it depends where any future growth would happen.</p>	<p>0</p> <p>This option is unlikely to have any material effect on this topic area relative to the baseline position.</p>	<p>?</p> <p>Effects of this option relative to the baseline on water quality and resources would depend on where any satellite campus is located and the nature of the development.</p>	<p>0 / ?</p> <p>This option is unlikely to have any material effect on this topic area relative to the baseline position. For EHU, the nature of effects depend on the framework for future growth.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Air quality (Objective 8)	<p align="center">-</p> <p>EHU expansion would lead to extra traffic which could have negative effects on air quality. These could be mitigated through a travel plan but overall are likely to be negative relative to the baseline.</p>	<p align="center">-</p> <p>EHU expansion would lead to extra traffic which could have negative effects on air quality. No travel plan would be required under this policy although it may be covered by other policies.</p>	<p align="center">0 / -</p> <p>Modest on-campus EHU expansion could lead to extra traffic which could have negative effects on air quality. These could be mitigated through a travel plan so only minor effects relative to the baseline.</p>	<p align="center">-</p> <p>A satellite campus would create additional journeys between the new and current campus. Some would be by sustainable modes, but it is expected many would be by car, so negative effects relative to the baseline.</p>	<p align="center">0 / - / ?</p> <p>This option is unlikely to have any material effect on this topic area relative to the baseline position. For EHU, the nature of effects depend on the framework for future growth; traffic generated by future growth is likely to have negative effects relative to the baseline, in terms of air quality.</p>
Biodiversity (Objective 13)	<p align="center">0</p> <p>New development proposals would be subject to the Biodiversity Net Gain (BNG) policy, but the effects of a BNG policy are accounted for elsewhere. This option is thus unlikely to have any material effect on this topic area relative to the baseline position.</p>	<p align="center">0</p> <p>New development proposals would be subject to the BNG policy, but the effects of a BNG policy are accounted for elsewhere. This option is thus unlikely to have any material effect on this topic area relative to the baseline position.</p>	<p align="center">0</p> <p>This option is not expected to have any net effect relative to the baseline in terms of biodiversity.</p>	<p align="center">0</p> <p>New development proposals would be subject to the BNG policy, but the effects of a BNG policy are accounted for elsewhere. This option is thus unlikely to have any material effect on this topic area relative to the baseline position.</p>	<p align="center">0</p> <p>This option is not expected to have any net effect relative to the baseline in terms of biodiversity.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Local services and community infrastructure (Objectives 3 and 8)	<p>0</p> <p>New services may be provided, but these are primarily for additional students so overall there would be expected to be no net change relative to the baseline.</p>	<p>0 / -</p> <p>New services may be provided, but these would be for additional students and there would be no policy requirement to create links between EHU and the local community so overall there would be expected to be zero or negative effects relative to the baseline.</p>	<p>0</p> <p>Only a limited number of new services (if any) may be provided, and these would be primarily for additional students, so overall there would be expected to be no net change relative to the baseline.</p>	<p>+</p> <p>Providing a satellite campus would spread facilities from one location to two. If the policy requires EHU benefits to spread to the community (as per baseline policy) – including public use of EHU facilities, this should result in positive effects relative to the baseline.</p>	<p>0 / +</p> <p>Future development of education facilities could have a positive effect relative to the baseline if this framework included encouraging / requiring facilities to be shared with / benefit the local community. This is already the case for EHU, so effects would be minor.</p>

Summary

Option 1 would be likely to have positive effects in terms of benefits to the local economy and jobs, but negative effects in terms of land (especially if the campus were to expand to agricultural land south of St Helens Road) and transport.

Option 2 would have a mixture of negative and uncertain effects, as it would not be known how and where the University may seek to expand.

Option 3 would have fewer negative effects as development on the University campus would be strictly controlled, but there would be no positive economic effects as the future growth and development of the University would be constrained.

Option 4 would have a mixture of positive effects (spreading of economic benefits beyond Ormskirk) and negative effects (accommodation pressures and transport issues) as well as uncertainty – it would depend on the location of any satellite campus.

Option 5 should have positive economic effects and should generally avoid negative effects relative to the baseline. There is uncertainty relating to what the framework would be for Edge Hill University under this option – effects would be as per options 1-3.

Overall, option(s) 1 and 5 are considered the most sustainable, depending on whether Edge Hill University expands in Ormskirk (more sustainable) or onto greenfield land (less sustainable).

ECONOMY AND EMPLOYMENT / EE04B – SKILLS & TRAINING

Summary of ‘options’:

1. A skills and training policy

The employment of local people and use of local businesses during the construction and implementation stages of major development proposals would be promoted. Planning applications for major development would be expected to produce an employment and skills plan identifying opportunities for the employment and up-skilling of local people during the implementation phase. This policy would apply to schools, further education, and higher education.

2. Have no skills and training policy.

Overview of current baseline:

The current Local Plan and its accompanying SPDs have no skills and training policy. The NPPF does not mention skills and training. Any skills and training provided are not as a result of planning policy.

Topic	Option 1	Option 2
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+ / ++</p> <p>This option, if taken up, would have a positive effect compared to the baseline as it should increase the level of participation and attainment in education, address skills gaps and enable skills progression, help develop the Borough's knowledge base, and improve people's chance of success in applying for jobs. There may be other knock-on effects too (e.g. having a job compared to being unemployed can have health and social benefits).</p>	<p style="text-align: center;">0</p> <p>This option will have no effect on this policy area, given the baseline position has no skills and training policy, either locally or nationally.</p>

Topic	Option 1	Option 2
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">+ / ++</p> <p>This option should have a positive effect, possibly a significant positive effect if taken up <i>en masse</i> as it should provide job opportunities, including in the most needy areas, provide a broad range of jobs and employment opportunities, and possibly help attract workers, residents and investors to the Borough.</p>	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>

Topic	Option 1	Option 2
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>

Topic	Option 1	Option 2
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>	<p style="text-align: center;">0</p> <p>This option will have no or little effect on this policy area.</p>

Summary

Option 1, having a skills and education policy, would provide social and economic sustainability benefits in terms of improving people's skills and possibly qualifications, and helping employment prospects compared to the baseline position, which has no such policy (the same as option 2).

Option 1 is therefore clearly the more sustainable option.

ENVIRONMENT AND HEALTH / EH01 – PRESERVING AND ENHANCING THE BOROUGH'S NATURE

- Summary of 'options':**
1. Continue the current approach of WLLP Policy EN2, but include new requirement in relation to a 10% BNG
 2. Continue the current approach of WLLP Policy EN2, but include new requirement in relation to a 20% BNG
 3. Continue the current approach of WLLP Policy EN2, but with a 'banded' BNG requirement – for example, 10% in urban areas and 20% in areas with more diverse wildlife
 4. Create a separate, specific Biodiversity Net Gain (BNG) policy (could be weaker or stronger than 10%). This would likely set out the details through a Supplementary Planning Document.

Current baseline: The draft Environment Bill, expected to be enacted later in 2021, will require a minimum net gain in biodiversity of 10% for new development. Essentially, biodiversity net gain (BNG) could be dealt with as a new stand-alone policy or incorporated into a wider natural environment policy. Currently the baseline position is the NPPF, which sets out the importance of achieving environmental sustainability, including improving biodiversity and net gain, and WLLP Policy EN2: Preserving and enhancing West Lancashire's Natural Environment – which includes reference to nature conservation sites, priority species and habitats, trees and landscaping, land resources, coastal zones and landscape character.

Topic	Option 1	Option 2	Option 3	Option 4
<p style="text-align: center;">Population, Health and Social Inclusion (Objectives 1-3)</p>	<p style="text-align: center;">0</p> <p>This is the option most aligned to the baseline / current policy but would additionally introduce the (anticipated) national BNG requirement of 10%.</p> <p>The importance of increasing biodiversity is well-established, and such improvements would create attractive environments which enhance health and wellbeing and quality of life.</p> <p>A 10% requirement, in line with national policy, would have little/no effect compared to the baseline.</p>	<p style="text-align: center;">+ / 0</p> <p>This approach would require 20% BNG, above the national 10% requirement, but could only be introduced with appropriate evidence.</p> <p>The importance of increasing biodiversity is well-established, and such a requirement would create greater, attractive environments which enhance health and wellbeing and quality of life.</p> <p>However, increasing requirements could render some sites unviable making it harder to deliver improvements.</p>	<p style="text-align: center;">0 / +</p> <p>This approach would support a banded BNG requirement, above the national 10% requirement, but could only be introduced with appropriate evidence.</p> <p>A 10% requirement, in line with national policy, would have little/no effect on the baseline. An additional requirement seeking up to 20% BNG would help increase biodiversity above the baseline.</p> <p>A flexible approach such as this could help maximise opportunities but would depend on a strong evidence base.</p> <p>The importance of increasing biodiversity is well-established, and such a requirement would create greater, attractive environments which enhance health and wellbeing and quality of life.</p>	<p style="text-align: center;">0 / + / ?</p> <p>The creation of a specific BNG policy would be a more prescriptive approach and could set out a framework on an area basis, or how developments could contribute to off-site schemes. A specific BNG policy, with supporting SPD, would help create attractive, biodiverse environments which enhance health and wellbeing and quality of life and could go much further to tightly prescribe and control the type / location of BNG required. However, without further information on what this approach may contain, and whether it could be weaker or stronger approach, it is difficult to assess.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>

Topic	Option 1	Option 2	Option 3	Option 4
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>

Topic	Option 1	Option 2	Option 3	Option 4
<p style="text-align: center;">Land Resources (Objective 9)</p>	<p style="text-align: center;">0</p> <p>The requirement for 10% BNG could have some effects on the land resources (e.g. if land was to be required for habitat creation), but this would not be expected to create any significant impacts on land resource and in most cases would be expected to make a positive contribution to restoring land to nature (re-wilding).</p> <p>As 10% BNG is to be a national requirement, formalised through local policy, it is expected that this would have little/no effect on the baseline.</p>	<p style="text-align: center;">0 / + / ?</p> <p>A higher requirement for 20% BNG could have some effects on the land resources (e.g. land required for habitat creation), but this would not be expected to create any significant impacts on land resource and in most cases would be expected to make a positive contribution to restoring land to nature (re-wilding).</p> <p>The impact of this option on land resources would likely depend on how BNG was to be delivered – on or off site, and whether new habitat areas are to be created or whether existing ones would be improved.</p> <p>The importance of increasing biodiversity is well-established, but greater requirements could render some sites unviable making it harder to deliver improvements.</p>	<p style="text-align: center;">0 / + / ?</p> <p>A banded approach requiring up to 20% could have some effects on land resources, but this would not be expected to create any significant impacts on land resource and in most cases would be expected to make a positive contribution to restoring land to nature (re-wilding).</p> <p>The impact of this option would likely depend on how BNG was to be delivered – on or off site, and whether new habitat areas are to be created or whether existing ones would be improved.</p> <p>A flexible approach in relation to requirements could help maximise opportunities to improve biodiversity but would depend on a strong evidence base.</p> <p>The importance of increasing biodiversity is well-established, but greater requirements could render some sites unviable making it harder to deliver improvements.</p>	<p style="text-align: center;">?</p> <p>The creation of a specific BNG policy would be a more prescriptive approach. A specific BNG policy, with supporting SPD, would help create attractive, biodiverse environments. However, without further information on what this approach may contain, and whether it could be weaker or stronger approach, it is difficult to assess the impact on land resources.</p> <p>The impact of this option would likely depend on how BNG was to be delivered – on or off site, and whether new habitat areas are to be created or whether existing ones would be improved.</p>

Topic	Option 1	Option 2	Option 3	Option 4
<p>Cultural heritage and landscape (Objective 10)</p>	<p style="text-align: center;">0</p> <p>The requirement for 10% BNG could have some effects on the visual landscape (e.g. planting of more trees, habitat creation), but this would not be expected to create any significant detrimental impacts on landscape with due consideration of appropriate siting. As 10% BNG is to be a national requirement, formalised through local policy, it is expected that this would have little/no effect on the baseline.</p>	<p style="text-align: center;">0 / ?</p> <p>The additional requirement for 20% BNG could have some greater effects on the visual landscape (e.g. planting of more trees, habitat creation), but this would not be expected to create any significant impacts on landscape with due consideration of appropriate siting</p> <p>The impact of this option would likely depend on how BNG was to be delivered – on or off site, and whether new habitat areas are to be created or whether existing ones would be improved.</p> <p>The importance of increasing biodiversity is well-established, but greater requirements could render some sites unviable making it harder to deliver improvements.</p>	<p style="text-align: center;">0 / ?</p> <p>A banded approach requiring up to 20% BNG could have some greater effects on the visual landscape (e.g. planting of more trees, habitat creation), but this would not be expected to create any significant impacts on landscape with due consideration of appropriate siting.</p> <p>The impact of this option would likely depend on how BNG was to be delivered – on or off site, and whether new habitat areas are to be created or whether existing ones would be improved.</p> <p>A flexible approach in relation to requirements could help maximise opportunities to improve biodiversity but would depend on a strong evidence base.</p> <p>The importance of increasing biodiversity is well-established, but greater requirements could render some sites unviable making it harder to deliver improvements</p>	<p style="text-align: center;">?</p> <p>The creation of a specific BNG policy would be a more prescriptive approach. A specific BNG policy, with supporting SPD, would help create attractive, biodiverse environments. However, without further information on what this approach may contain, and whether it could be weaker or stronger approach, it is difficult to assess the impact on landscape.</p> <p>The impact of this option would likely depend on how BNG was to be delivered – on or off site, and whether new habitat areas are to be created or whether existing ones would be improved.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>The requirement for 10% BNG could help to provide blue and green habitats that can help to mitigate climate change and flooding. As 10% BNG is to be a national requirement, formalised through local policy, it is expected that this would have little/no effect on the baseline.</p>	<p style="text-align: center;">+</p> <p>The requirement for 20% BNG could help to provide blue and green habitats that can help to mitigate climate change and flooding. A 20% requirement would be greater than national policy, and so deliver more improvements.</p> <p>The importance of increasing biodiversity is well-established, but greater requirements could render some sites unviable making it harder to deliver improvements.</p>	<p style="text-align: center;">+</p> <p>The requirement for up to 20% BNG could help to provide blue and green habitats that can help to mitigate climate change and flooding.</p> <p>A 20% requirement would be greater than national policy, and so deliver more improvements. A 10% requirement, in line with national policy, would have little/no effect on the baseline.</p> <p>A flexible approach in relation to requirements could help maximise opportunities to improve biodiversity but would depend on a strong evidence base.</p> <p>The importance of increasing biodiversity is well-established, but greater requirements could render some sites unviable making it harder to deliver improvements.</p>	<p style="text-align: center;">+ / ?</p> <p>The creation of a specific BNG policy would be a more prescriptive approach. A specific BNG policy, with supporting SPD, would help create attractive, biodiverse environments. However, without further information on what this approach may contain, and whether it could be weaker or stronger approach, it is difficult to assess the impact on climate change and flooding.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>The requirement for 10% BNG could help to improve blue infrastructure and water quality so to provide habitat and support species. 10% BNG is to be a national requirement, formalised through local policy, so it is expected that this would have little/no effect on the baseline.</p>	<p style="text-align: center;">+</p> <p>The additional requirement for 20% BNG could help to improve blue infrastructure and water quality so to provide habitat and support species.</p>	<p style="text-align: center;">+</p> <p>A 10% requirement, in line with national policy, would have little/no effect on the baseline. The additional requirement for up to 20% BNG could help to improve blue infrastructure and water quality so to provide habitat and support species. A flexible approach in relation to requirements could help maximise opportunities to improve biodiversity but would depend on a strong evidence base.</p>	<p style="text-align: center;">+ / ?</p> <p>The creation of a specific BNG policy would be a more prescriptive approach. A specific BNG policy, with supporting SPD, would help create attractive, biodiverse environments. However, without further information on what this approach may contain, and whether it could be weaker or stronger approach, it is difficult to assess the impact here.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>The requirement for 10% BNG could help to indirectly help improve air quality through an increase in habitat (e.g. more trees). 10% BNG is to be a national requirement, formalised through local policy, so it is expected that this would have little/no effect on the baseline.</p>	<p style="text-align: center;">+</p> <p>The additional requirement for 20% BNG could help to indirectly help improve air quality through an increase in habitat (e.g. more trees).</p>	<p style="text-align: center;">+</p> <p>A 10% requirement, in line with national policy, would have little/no effect on the baseline. The additional requirement for up to 20% BNG could help to improve air quality through an increase in habitat (e.g. more trees). A flexible approach in relation to requirements could help maximise opportunities to improve biodiversity but would depend on a strong evidence base.</p>	<p style="text-align: center;">+ / ?</p> <p>The creation of a specific BNG policy would be a more prescriptive approach. A specific BNG policy, with supporting SPD, would help create attractive, biodiverse environments. However, without further information on what this approach may contain, and whether it could be weaker or stronger approach, it is difficult to assess the impact here.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>The requirement for 10% BNG would help improve biodiversity. As 10% BNG is to be a national requirement, formalised through local policy, it is expected that this would have little/no effect on the baseline.</p>	<p style="text-align: center;">+ / ++</p> <p>The additional requirement for 20% BNG would certainly help improve biodiversity. With a 20% requirement, this approach would provide the greatest potential increase in biodiversity.</p> <p>The importance of increasing biodiversity is well-established, but greater requirements could render some sites unviable making it harder to deliver improvements.</p>	<p style="text-align: center;">+</p> <p>A 10% requirement, in line with national policy, would have little/no effect on the baseline.</p> <p>The additional requirement for up to 20% BNG would certainly help to further improve biodiversity.</p> <p>A strong evidence base would be needed to understand those areas which could support / demand a higher requirement, and this could be difficult to do at a local / site level. Furthermore, setting requirements based on the biodiversity value between urban and rural sites is problematic as it makes an assumption that all urban/brownfield sites are of lower value than rural/greenfield sites, whereas brownfield sites can have a high biodiversity and environmental value.</p> <p>Greater requirements could render some sites unviable making it harder to deliver improvements.</p>	<p style="text-align: center;">+ / ?</p> <p>The creation of a specific BNG policy would be a more prescriptive approach. A specific BNG policy, with supporting SPD, would help create attractive, biodiverse environments. However, without further information on what this approach may contain, and whether it could be weaker or stronger approach, it is difficult to assess the impact here.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>

Summary

Option 1 is the option most aligned to the baseline / current policy but would introduce the (emerging) national BNG requirement of 10%. The importance of increasing biodiversity is well-established, and the introduction of biodiversity net gain is a positive, sustainable step in addition to the existing baseline and/or continued policy.

Option 2 would introduce a BNG requirement of 20%, above the national requirement. This would work to improve biodiversity beyond Government targets, which is an admirable and ambitious approach. However, increasing requirements could render some sites unviable making it harder to deliver wider improvements (i.e. it would be better to have some improvement than no improvements).

Option 3 would be the most flexible approach, requiring a minimum of 10% but up to 20% on sites with more diverse wildlife, and is essentially a hybrid of options 1 and 2. It would be the most flexible approach to improving biodiversity in the Borough but would require the most substantial evidence base in order consider viability and identify clear boundaries for the banded requirements.

Option 4 would create a specific BNG policy, supported by an SPD. It would be a more prescriptive approach and could help secure more BNG than that at present, potentially above the national 10%, with a figure, and all other requirements, determined based on gathered evidence.

Overall, option 3 is considered to be the most sustainable and flexible approach, but is subject to the availability of sufficiently detailed evidence to identify clear boundaries for banded requirements. The remaining options are also subject to evidence relating to viability and biodiversity.

ENVIRONMENT AND HEALTH / EH02 – Landscape & land resources

- Summary of ‘options’:**
1. Continue the approach of WLLP Policy EN2: Preserving and Enhancing West Lancashire's Natural Environment, including Parts 4 (Land Resources), 5 (Coastal Zone) and 6 (Landscape Character).
 2. Continue with existing policy but remove the Coastal Zone designation from both the Local Plan Policies Map and the policy. i.e. remove Part 5 of the existing Local Plan Policy EN2.
 3. A less restrictive approach than existing Local plan Policy EN2.
 4. A more prescriptive approach than existing Local Plan Policy EN2.

Overview of current baseline: The existing approach of EN2 has a restrictive approach to new development taking place on the best quality agricultural land (grades 1, 2 and 3a) and would limit uses within the designated Coastal Zones shown on the Local Plan Policies Map to the essential needs of coastal navigation, recreation, tourism and leisure, flood protection, fisheries, nature conservation and / or agriculture. Options 1 therefore represents the current baseline position.

Topic	Option 1	Option 2	Option 3	Option 4
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>A less restrictive approach, when compared to the baseline, could result in the allocation of more development sites on the best and most versatile (BMV) agricultural land. This would allow for more residential development opportunities in the Borough. As such this option is considered to have a positive effect on this objective.</p>	<p style="text-align: center;">-</p> <p>A more prescriptive approach may result in fewer development sites being on Green Belt and BMV agricultural land, as it would require greater compensation methods where harm is identified, and therefore may result in sites being unviable. As such this option is considered to have a negative effect when considered against the existing baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>A less restrictive approach, when compared to the baseline, could result in the allocation of more development sites on the best and most versatile (BMV) agricultural land. This could allow for more commercial development opportunities in the Borough. As such this option is considered to have a positive effect on this objective.</p>	<p style="text-align: center;">-</p> <p>A more prescriptive approach may result in fewer development sites being on Green Belt and BMV agricultural land, as it would require greater compensation methods where harm is identified, and therefore may result in sites being unviable. As such this option is considered to have a negative effect when considered against the existing baseline.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">-</p> <p>This policy approach would likely result in development on the Borough's important land resources which otherwise would be protected from development.</p>	<p style="text-align: center;">+</p> <p>A more prescriptive approach would seek to preserve the Borough's land resources and would prevent inappropriate development. Therefore it is considered that this approach would have a positive effect on this objective when considered against the existing baseline.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">-</p> <p>This policy approach would likely result in development affecting the Borough's landscape which otherwise would be protected from development.</p>	<p style="text-align: center;">+</p> <p>A more prescriptive approach would seek to preserve the Borough's landscape and would prevent inappropriate development. Therefore it is considered that this approach would have a positive effect on this objective when considered against the existing baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0 / -</p> <p>The option to remove the Coastal Zone section of the existing policy could result in inappropriate development within the coastal zone area to the north of the Borough. In relation to flood risk, development in that area would then revert to national and local policy relating to flood risk. However, the Coastal Zones designation predominantly relates to intertidal areas and coastal marsh, part of which has recently been redesigned to flood with resultant benefits.</p>	<p style="text-align: center;">-</p> <p>This policy option could have a negative impact when compared to the existing baseline as it will fail to restrict development in inappropriate / less sustainable locations. As such this option is considered to have a negative effect when considered against the existing baseline.</p>	<p style="text-align: center;">+</p> <p>This policy option could have a positive impact when considered against the existing baseline as development would be directed to the most sustainable land options. This could include ensuring development is not permitted where flooding could be a concern. Therefore, this option is considered to have a positive effect.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">-</p> <p>This policy option could have a negative impact when compared to the existing baseline as it will fail to restrict development in inappropriate / less sustainable locations. Green Belt and BMV Agricultural Land can be linked to high biodiversity levels, and development on this land would harm this. As such this option is considered to have a negative effect when considered against the existing baseline.</p>	<p style="text-align: center;">+</p> <p>This policy option could have a positive impact when compared to the existing baseline as it will restrict development in areas with high levels of biodiversity. As such this option is considered to have a positive effect when considered against the existing baseline</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This policy option is a continuation of current Local Plan policy EC2. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>

Summary

Option 1 is a continuation of current policy, and therefore has a neutral effect when compared to the baseline position.

Option 2 seeks to remove the protection of the Coastal Zone from the original policy, and would, broadly, result in little change when compared to the baseline position, albeit could reduce some protection of that coastal zone.

Option 3 would have a positive impact on housing in the Borough by potentially allowing additional development within West Lancashire's natural environment, however the negative impacts on the biodiversity of the Borough, climate change and the Borough's land resources would result in this option being less sustainable when compared to the existing baseline.

Option 4 would restrict development and would require specific mitigation measures to help reduce the impact of a development proposal upon the Borough's landscape history and character. Whilst this would protect the Borough's land resource and biodiversity, it may restrict housing development, or direct it to an area where it is not needed the most. Therefore, this option is not considered to be particularly sustainable when considered against the existing baseline.

Overall, Option1 is considered the most sustainable.

ENVIRONMENT AND HEALTH / EH03 – Flood risk / water resources

- Summary of ‘options’:**
1. Update the existing WLLP policy to reflect advances in national guidance and practice and more recent local evidence on flood risk.
 2. Continue with existing Local plan policy GN3- Part 3.
 3. A new policy similar to the preferred policy approach but less strict about when a Flood Risk Assessment would be required with planning applications.

- Overview of current baseline:** The current baseline is the NPPF and existing WLLP policy GN3.3. The policy ensures that development does not result in unacceptable flood risk or drainage problems by requiring it to:
- 1) be located away from Flood Zones 2 and 3 (therefore concentrating on coastal and river sources);
 - 2) where applicable, satisfy the sequential and exception test;
 - 3) be supported by a Flood Risk Assessment (but in fewer circumstances than the preferred approach);
 - 4) show that sustainable drainage systems have been explored; and 5) reduce surface water run-off.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. However, it is acknowledged that limiting the risk of flooding for residential properties would ultimately have positive effects on the health and wellbeing of those residents.</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. However, it is acknowledged that limiting the risk of flooding for residential properties would ultimately have positive effects on the health and wellbeing of those residents.</p>
Housing (Objective 7)	<p style="text-align: center;">+ / -</p> <p>This policy option would introduce greater restrictions to development in areas at risk of flooding. It could therefore reduce development opportunities for new housing when compared to the current baseline o. However, it would also seek to ensure that uses that are most vulnerable to flooding would be sited on the parts of a development at lowest flood risk, thereby improving sustainable housing opportunities</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change.</p>	<p style="text-align: center;">+ / -</p> <p>This option would be similar to Option 1, but be less strict about when a Flood Risk Assessment would be required., This could make it easier for sites to be brought forward, but could result in more housing sites being located in areas at high risk of flooding.</p>

Topic	Option 1	Option 2	Option 3
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">+ / -</p> <p>This policy option would introduce greater restrictions to development in areas at risk of flooding. It could therefore reduce commercial development opportunities when compared to the current baseline. However, it would also seek to ensure that uses that are most vulnerable to flooding would be sited on the parts of a development at lowest flood risk, thereby improving sustainable development opportunities. There may be economic impacts arising from development in flood risk areas, such as higher insurance premiums</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change.</p>	<p style="text-align: center;">+ / -</p> <p>This option would be similar to Option 1 but be less strict about when a Flood Risk Assessment would be required. This could make it easier for sites to be brought forward but could result in more development sites being located in areas at high risk of flooding. There may be economic impacts arising from development in flood risk areas, such as higher insurance premiums.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Land Resources (Objective 9)	<p style="text-align: center;">+ / ?</p> <p>This approach would not propose any residential development site allocations in areas at high risk from flooding, and a stricter approach would therefore ensure only the most sustainable and appropriate sites are identified for development. Impact on land resources would be dependent on the sites ultimately allocated. .</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change.</p>	<p style="text-align: center;">/ ?</p> <p>This option would be similar to Option 1, but be less strict about when a Flood Risk Assessment would be required. This could make it easier for sites to be brought forward, but could result in more development sites being located in areas at high risk of flooding. Impact on land resources would be dependent on the sites ultimately allocated.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+</p> <p>This policy option will seek to ensure that development will not take place on land at highest risk of flooding, and developments which are at risk of flooding will require an FRA. Development will be required to incorporate SuDS as far as practical which will also provide flood risk mitigation. Therefore, this policy option is considered to make a positive impact when assessed against the baseline.</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change</p>	<p style="text-align: center;">-</p> <p>As this option would result in smaller sites not requiring an FRA for development proposals, this option may result in these developments being at greater risk of flooding. Therefore, this policy option is considered to make a negative impact when assessed against the baseline.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">+</p> <p>This policy option would include requirements relating to water quality (relating to water courses water bodies and groundwater) and also the protection of assets and water resources. This option is therefore considered to have a positive effect when considered against the current baseline.</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. However, it is recognised that appropriate management of water resources can have an impact on biodiversity.</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. However, it is recognised that appropriate management of water resources can have an impact on biodiversity.</p>

Topic	Option 1	Option 2	Option 3
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option reflects the current baseline position and therefore represents no change</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Summary

Option 1 would update existing policy to ensure that national guidance and practice is followed, and local evidence on flood risk is considered. Whilst the additional restrictions relating to Flood Risk Assessments and the safe disposal of surface water may have a negative impact on the provision of housing delivery across the borough, the positive impact of this policy approach on flood risk, water quality and land resources results in a sustainable approach to flood risk and water resources.

Option 2 would seek to continue with the current WLLP policy and therefore would have a neutral effect compared to the existing baseline position.

Option 3 would result in the relaxation of Flood Risk Assessment requirements for most smaller developments, and therefore whilst this will have a positive impact on housing delivery within the borough, because a greater number of smaller sites could come forward, the negative impact on flood risk and land resources results in a less sustainable option.

Overall, Option 1 is considered the most sustainable.

ENVIRONMENT AND HEALTH / EH04 – Contamination & pollution

- Summary of ‘options’:**
1. Continue WLLP approach but strengthen it with regard to health.
 2. Have no specific policy on pollution and contamination.
 3. Take a more relaxed approach to pollution and contamination in order to prioritise brownfield land development.

Overview of current baseline: WLLP Policy GN3.5 requires that proposals for development minimise the risk from all types of pollution and contamination and seek to remediate and restore contaminated land. This represents the current baseline position and aligns closely with Option 1.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>This option would have positive impact on the population as it would seek to strengthen the protection of health (from pollution and contamination). Therefore this option would have a more positive impact on this topic than the current baseline.</p>	<p style="text-align: center;">-</p> <p>This policy option would have a negative impact on this topic as it may result in greater exposure to pollution and contamination for the residents of West Lancashire, thereby risking a detrimental effect on health. As such, this option would have a negative effect when compared to the baseline.</p>	<p style="text-align: center;">-</p> <p>This policy option would have a negative impact on this topic as it may result in greater exposure to pollution and contamination for the residents of West Lancashire, thereby risking a detrimental effect on health. As such, this option would have a negative effect when compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.></p>
Land Resources (Objective 9)	<p style="text-align: center;">0 / -</p> <p>By increasing the focus on health, this approach could seek to direct development away from all types of 'unacceptable' levels of pollution and contamination risk. This may reduce the opportunity for some sites to be remediated and developed (for housing/commercial uses) meaning that there may be more demand placed on 'greenfield' sites. .</p>	<p style="text-align: center;">-</p> <p>This option would give the Council less control over contaminated land, and would be led, instead, by the NPPF and other legislation outside of Planning. Having no policy may not help suitably address contaminated land issues in the borough.</p>	<p style="text-align: center;">+</p> <p>This approach would take as supportive stance as possible to the redevelopment of brownfield land by minimising requirements for dealing with pollution and contamination. This would have a positive impact on the land resources of the borough as it could make more brownfield sites available for development, thereby protecting 'greenfield' sites. . Therefore, this option could have a more positive effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">-</p> <p>The current baseline seeks to protect water quality and ground water resources. The absence of a local policy would therefore be likely to result in a negative effect on water quality in the borough.</p>	<p style="text-align: center;">-</p> <p>A more relaxed approach could encourage the development of Brownfield land with less remediation work required to reduce existing pollution on these sites. This could result in a negative impact on water quality in the borough. Therefore, this option would be likely to have a negative effect on this objective.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">-</p> <p>The current baseline seeks to ensure development should be designed to minimise any reduction in air quality. The absence of a specific policy for contamination and pollution could result in a decrease in air quality. As such it is considered that this option would be likely to have a negative effect on this objective.</p>	<p style="text-align: center;">-</p> <p>The current baseline seeks to ensure development should be designed to minimise any reduction in air quality. A more relaxed approach / weaker policy could result in a decrease in air quality, and therefore this option would be likely to have a negative effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have little or no effect on this objective compared to the baseline. However, having no specific policy would do less, than the current baseline, to respond to pollution and contamination issues. A weaker response may, in turn, impact on biodiversity by affording it less protection from harm.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have little or no effect on this objective compared to the baseline. However, having a weaker policy would do less, than the current baseline, to respond to pollution and contamination issues. A weaker response may, in turn, impact on biodiversity by affording it less protection from harm.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Summary

Option 1 seeks to continue with the current baseline, whilst also strengthening the approach towards health by presuming against new development that would result in exposure to 'unacceptable' levels of pollution or contamination. This would result in a stronger policy which seeks to direct development to the most sustainable locations and better protects the health and wellbeing of residents of the borough.

Option 2 would have the most negative effects on the above objectives when compared to the current baseline. It would result in fewer restrictions on development/pollution/contamination which seek to protect the environment and population of West Lancashire and so is considered the least sustainable option.

Option 3 would result in the relaxation of current policy (the baseline) but it is considered that it would not adequately protect the environment and population of the Borough.

Overall, Option 1 is considered the most sustainable.

ENVIRONMENT AND HEALTH / EH05 – AIR QUALITY

- Summary of ‘options’:**
1. General requirement for new development to minimise reductions in air quality and/or improve it where possible, and for sensitive uses to be sited away from sources of air pollution
 2. No air quality policy

Current baseline: WLLP Policy GN3.5 states proposals for development should 'be designed to minimise any reduction in air quality'. The NPPF states the planning system should actively manage patterns of growth and improve local environmental conditions to, amongst other things, improve air quality and public health. Option 1 aligns most closely with the current baseline position.

Topic	Option 1	Option 2
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>This option would continue the approach of current policy (WLLP GN3.5) by requiring new developments to minimise reductions in air quality but it would also add an additional requirement that new developments should seek to improve air quality, for example through planting or landscaping. Such improvements to air quality would help create greater positive impacts for public health. It could also improve well-being by creating more visually attractive and 'greener' environments.</p>	<p style="text-align: center;">-</p> <p>This option would remove a specific policy on air quality and instead rely on other policies to protect air quality. Compared to the current baseline (the LP), it would consequently do less to protect and improve air quality. Therefore, it is unlikely that it would better help to address public health.</p>

Topic	Option 1	Option 2
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. However, in the absence of an air quality policy, greater emphasis would be placed on other policies, including transport, to reduce motor vehicle use and encourage active / green transport.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+</p> <p>This option would place a greater requirement on new developments to help improve air quality, which could in turn also help mitigate climate change – for example, more tree planting and landscaping would improve air quality and also help to reduce CO2 levels and provide flood mitigation opportunities</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. However, in the absence of an air quality policy, greater emphasis would be placed on other policies, for example in supporting non-polluting means of energy generation and use.</p>

Topic	Option 1	Option 2
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Air quality (Objective 8)	<p style="text-align: center;">+</p> <p>This option would continue the approach of current policy (WLLP GN3.5) by requiring new developments to minimise reductions in air quality. It would also add an additional requirement that new developments should seek to improve air quality, for example through planting or landscaping. This would create a more sustainable policy, by adding a further 'positive' step to managing and improving air quality.</p>	<p style="text-align: center;">-</p> <p>This option would remove a specific policy on air quality and instead rely on other policies to protect air quality. This would mean policies would work to limit loss of air quality, rather than seek to improve air quality through new developments. This would be a less sustainable approach than the current Local Plan because a specific policy relating to air quality would be removed, placing reliance solely on related policies.</p>

Topic	Option 1	Option 2
Biodiversity (Objective 13)	<p style="text-align: center;">+</p> <p>This option would place a greater requirement on new developments to help improve air quality, which could in turn also help improve biodiversity – for example, more planting and landscaping would provide a greater variety of habitats.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. However, there would be some overlap with place-making, as policy would seek to locate sensitive uses as far away as possible from sources of air pollution (e.g. locate schools away from busy roads and instead close to green spaces). This may have an impact on where local services and community infrastructure are sited.</p>	<p style="text-align: center;">-</p> <p>If there was no dedicated 'air quality' policy in place, then there could potentially be more likelihood of sensitive uses being located near sources of air pollution, or 'out of settlement' services increasing traffic so to worsen air quality. It would place greater reliance on other policies to address air quality concerns.</p>

Summary

Option 1 would deliver some positive improvements to air quality because it would introduce additional requirements for developments to seek opportunities to improve air quality, rather than just minimise any reduction in air quality.

Option 2 would reduce the effectiveness of the current policy/baseline by removing air quality requirements and placing greater reliance on other policies to reference air quality and (indirectly) affect change.

Overall, Option 1 is considered the most sustainable.

ENVIRONMENT AND HEALTH / EH06 – Green Infrastructure & Open Space (4 policies)

Approach 1:

- Summary of ‘options’:**
1. An overarching Green Infrastructure (GI) policy would promote protecting and enhancing the GI network as well as promoting Active Design and the improvement of cycling and walking networks.
 2. Update Adopted Local Plan Policy EN3: Provision of Green Infrastructure and Open Recreation Space to include criteria for development of open space to meet national advice.

Overview of current baseline: WLLP Policy EN3 is currently split into 2 parts; the first covers Green Infrastructure and the second, Open Space and Recreation Facilities. Option 2 would therefore most closely reflect the current baseline.

Topic	Option 1	Option 2
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>An overarching policy approach would help promote and enhance the GI network, thereby also supporting opportunities to improve the health and wellbeing of residents of West Lancashire. As such this option is considered to make a positive impact when compared to the existing baseline.</p>	<p style="text-align: center;">+</p> <p>This policy option would provide a more detailed approach to Green Infrastructure and Open space and recreation facilities. As this option would update and strengthen the existing policy, to include criteria for the development of open space to meet national advice, it would have a more positive impact on this objective when compared to the baseline policy approach. It would provide opportunities to improve health and wellbeing of residents.</p>

Topic	Option 1	Option 2
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2
Transport (Objective 8)	<p style="text-align: center;">+</p> <p>This option would create an overarching GI policy to enhance the GI network, promote active design and improvements to cycling and walking networks. It would therefore help to promote sustainable and active travel networks, which could help reduce vehicular traffic and congestion, and improve opportunities for active travel.</p>	<p style="text-align: center;">0 / ?</p> <p>This option would update the existing EN3 policy but there are insufficient details about whether or not it would more strongly promote GI and active travel opportunities. .</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline. Whilst some land is required to deliver GI and recreation / open spaces, it is not anticipated that this would have a detrimental impact on land resources.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline. Whilst some land is required to deliver GI and recreation / open spaces, it is not anticipated that this would have a detrimental impact on land resources.</p>

Topic	Option 1	Option 2
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">+</p> <p>This option would provide the framework for enhancing the GI network which in turn will have a positive effect on the landscape within the borough through the promotion of open space.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+</p> <p>This policy option will set the framework for more detailed policies relating to GI, open space and trees, which will have a positive effect on tackling the climate emergency. The protection of existing / support for new trees helps to lock in, and reduce, atmospheric carbon whilst the promotion of active travel, through GI, can reduce vehicular traffic reducing greenhouse gas emissions from transport. This approach would strengthen policy and have a positive impact when compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>This policy approach would set out a strategic approach for how development would support the provision of a network of green spaces. This would be more detailed than the existing baseline and is therefore considered to be more positive.</p>

Topic	Option 1	Option 2
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">+</p> <p>Strengthening GI requirements, for example providing trees, could help improve air quality. This option would therefore have a small positive effect on the baseline position.</p>	<p style="text-align: center;">+</p> <p>Strengthening GI requirements, for example providing trees, could help improve air quality. This option would therefore have a small positive effect on the baseline position.</p>

Topic	Option 1	Option 2
Biodiversity (Objective 13)	<p style="text-align: center;">+</p> <p>This policy option will set the framework for more detailed policies relating to open space and trees. The provision of open space and trees within the borough will have a positive effect on the biodiversity of the borough. This policy approach is therefore considered to have a positive impact when compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>The strategic approach to the provision of open space will have a positive impact on the biodiversity of the borough as it is likely that a network will be achieved which supports the councils existing ecological networks. As such it is considered to have a positive impact when compared to the existing baseline.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">+</p> <p>This option would provide an overarching GI policy and would set a framework for more detailed policies in relation to open space and trees. Open space is classed as 'community infrastructure' and therefore this approach would have a positive effect on the provision of community infrastructure.</p>	<p style="text-align: center;">+</p> <p>This option would include amended criteria relating to open space, local standards for providing new open space and costs for off-site open space provision. Open space is classed as 'community infrastructure' and therefore this approach would have a positive effect on the provision of community infrastructure.</p>

Summary

Option 1 is considered to be the more sustainable option as it is considered to have a positive effect on a number of the objectives. The potential for a more detailed framework addressing open space and trees will allow for more flexibility in terms of creating sustainable development opportunities.

Option 2 would update WLLP EN3 to meet national advice and requirements, so would deliver more positive effects when compared to the existing baseline.

Overall, Option 1 is considered the most sustainable.

Approach Two

- Summary of ‘options’:**
1. An Open Space, Sport, Leisure and Physical Activity policy.
 2. Update existing Local Plan Policy EN3.
 3. A separate built sports facilities policy.

Overview of current baseline: WLLP Policy EN3 is currently split into 2 parts; the first covers Green Infrastructure and the second, Open Space and Recreation Facilities. Option 2 would therefore most closely reflect the current baseline.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>This policy approach would contain criteria for considering where the loss of open space and leisure facilities would be permitted and would also identify opportunities for providing new open space in connection with new development. This would therefore support opportunities for health and wellbeing, and so would be expected to have a positive effect when compared to the existing baseline.</p>	<p style="text-align: center;">0 / +</p> <p>This policy option would revert back to WLLP EN3, but with amended criteria relating to open space to meet national advice and requirements. As such it is equivalent to the baseline position and therefore this option represents no change compared to the baseline, or would result in only a minor positive effect, given that national requirements also form the baseline position.</p>	<p style="text-align: center;">+</p> <p>This approach would separate Option 1 into two separate policies – one dealing with open space and the other with built sport facilities. A separate built sports facilities policy would have a positive effect on this objective as it would result in the provision of additional facilities for the residents of West Lancashire.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline. Whilst some land is required to deliver GI and recreation / open spaces, it is not anticipated that this would have a detrimental impact on land resources.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline. Whilst some land is required to deliver GI and recreation / open spaces, it is not anticipated that this would have a detrimental impact on land resources.</p>

Topic	Option 1	Option 2	Option 3
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+</p> <p>This policy approach would contain criteria for considering the loss of open space, and also the provision of new open space. Open space and its links to the climate emergency are considered to be of importance and therefore this policy approach is considered to have a positive impact when compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p style="text-align: center;">+</p> <p>Open space can help support and create greater levels of biodiversity, therefore the consideration for providing new open space for new residential developments will have a positive impact on this objective.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">+</p> <p>This option would provide detailed policy in relation to open space and built leisure facilities. Both are classed as 'community infrastructure' and therefore this approach would have a positive effect on the provision of community infrastructure.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>This option would provide detailed policy in relation to open space and built leisure facilities. Both are classed as 'community infrastructure' and therefore this approach would have a positive effect on the provision of community infrastructure</p>

Summary

Option 1 would cover the loss and provision of open space and built leisure facilities, providing a more detailed policy than the existing baseline, and so creating positive effects on a number of the objectives.

Option 2 would seek to continue to follow the existing WLLP EN3 approach and therefore does not differ from the existing baseline position. It would therefore be expected to have a neutral effect on the objectives. However, aside other preferred approaches assessed here, it would be expected to result in quite a lengthy policy.

Option 3 would separate Option 1 into two policies – one dealing with open space and the other with built sports facilities. A more holistic approach, considering both together, may be more sustainable.

Overall, Option1 is considered the most sustainable.

Approach Three:

- Summary of ‘options’:**
1. Open Space and Residential Development. This approach would be a companion to preferred policy approach 2 (above) and would set out details regarding local open space standards for new residential development proposals and the financial costs for provision and maintenance of open space to support requirements for financial contributions.
 2. A policy similar to option 1 but also requiring open space to be provided in connection with selected commercial developments.

Overview of current baseline: WLLP Policy EN3 is currently split into 2 parts; the first covers Green Infrastructure and the second, Open Space and Recreation Facilities. EN3.2(d) states that, where deficiencies exist, financial contributions towards public open space may be required but does not specify the costs involved, which are currently subject to a separate SPD. However, SPDs are no longer a suitable approach because the Local Plan should set out the costs to ensure that their viability has been appropriately considered as part of plan-making. Both approaches here are therefore a departure from the current position.

Topic	Option 1	Option 2
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>This policy approach would set out the financial contributions required for open space provision in relation to new residential developments. Provision of new public open space areas would have a positive impact on the health and wellbeing of residents.</p>	<p style="text-align: center;">+</p> <p>This policy approach would set out the financial contributions required for open space provision in relation to new residential and commercial developments. Provision of new public open space areas would have a positive impact on the health and wellbeing of residents.</p>
Housing (Objective 7)	<p style="text-align: center;">0 / -</p> <p>This option would have little or no effect on this objective compared to the baseline. Financial contributions may have an impact on viability which could affect housing delivery.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have little or no effect on this objective compared to the baseline. Financial contributions may have an impact on viability which could affect housing and commercial delivery.</p>

Topic	Option 1	Option 2
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline. Under this option, commercial developments would not be subject to developer contributions towards public open space.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have little or no effect on this objective compared to the baseline. Financial contributions may have an impact on viability which could affect housing and commercial delivery.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline. Whilst some land is required to deliver GI and recreation / open spaces, it is not anticipated that this would have a detrimental impact on land resources.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline. Whilst some land is required to deliver GI and recreation / open spaces, it is not anticipated that this would have a detrimental impact on land resources.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+</p> <p>Open space and its links to the climate emergency are considered to be of importance and therefore this policy approach is considered to have a positive impact when compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>Open space and its links to the climate emergency are considered to be of importance and therefore this policy approach is considered to have a positive impact when compared to the baseline.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">+</p> <p>Open space can help support and create greater levels of biodiversity, therefore the consideration for providing new open space for new residential developments will have a positive impact on this objective.</p>	<p style="text-align: center;">+</p> <p>Open space can help support and create greater levels of biodiversity, therefore the consideration for providing new open space for new residential developments will have a positive impact on this objective.</p>

Topic	Option 1	Option 2
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">+</p> <p>This option would provide detailed policy in relation to financial contributions towards new open space. This is classed as 'community infrastructure' and therefore this approach would have a positive effect on the provision of community infrastructure</p>	<p style="text-align: center;">+</p> <p>This option would provide detailed policy in relation to financial contributions towards new open space. This is classed as 'community infrastructure' and therefore this approach would have a positive effect on the provision of community infrastructure</p>

Summary

Option 1 would seek to secure the provision of open space, or a financial contribution to open space for new residential developments. This is considered a more sustainable policy option than the existing baseline as it will plan positively for open space within the borough, ensuring that open space financial contributions are identified within the Local Plan, rather than a separate SPD.

Option 2 would do the same as option 1 but would also include these requirements for some commercial developments. This could extend open space provision further than if it were just required for residential developments.

Overall, option 1 and 2 are both considered to be equally sustainable, subject to viability evidence.

Approach Four:

- Summary of ‘options’:**
1. A Trees, Woodland, Hedgerows and Landscaping policy.
 2. Part 3 of existing Adopted Local Plan Policy EN2: Preserving and Enhancing West Lancashire's Natural Environment.
 3. Similar to the preferred approach with the addition of linkages to carbon offset and biodiversity net gain.

Overview of current baseline.: WLLP Policy EN2 (3) sets out the current policy in respect of trees and landscaping. The NPPF details national policy which applies in the consideration of trees and new developments.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>This option would seek to strengthen existing policy to protect and enhance existing trees, woodlands etc and encourage the creation of additional tree cover, as well as how trees etc should be considered in relation to new development proposals. This enhanced protection and support would have a positive effect on this objective because of the contribution they make to improving health and wellbeing.</p>	<p style="text-align: center;">0</p> <p>This policy option would continue policy EN2. As such it is equivalent to the baseline position and therefore this option represents little or no change compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>This option would take option 1 and include additional commentary in relation to biodiversity net gain and the potential for carbon offset. This enhanced approach would have a positive effect on this objective because of the contribution trees, biodiversity and mitigating climate change ultimately have to improving health and wellbeing.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline. Tree etc requirements may have an impact on viability which could affect housing delivery although this would need to be subject to evidence.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline. Tree etc requirements may have an impact on viability which could affect housing delivery although this would need to be subject to evidence.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline. Tree etc requirements may have an impact on viability which could affect commercial delivery although this would need to be subject to evidence.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline. Tree etc requirements may have an impact on viability which could affect commercial delivery although this would need to be subject to evidence.</p>

Topic	Option 1	Option 2	Option 3
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">+</p> <p>This policy approach would plan positively to increase the tree cover within the Borough whilst also ensuring that ancient woodland and veteran trees have enhanced protection. As such this is considered to have a positive effect when considered against the existing baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>This policy approach would plan positively to increase the tree cover within the Borough whilst also ensuring that ancient woodland and veteran trees have enhanced protection. As such this is considered to have a positive effect when considered against the existing baseline.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+</p> <p>The protection and enhancement of existing trees, alongside the creation of additional tree cover will support the Boroughs goal to tackle the climate emergency by ensuring natural environments are retained and enhanced. Trees play an important role in storing carbon, providing cooling and shade (e.g. street trees) and improving drainage (mitigating flood risk). This is considered a stronger approach than the existing baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>This policy option would be similar to option 1 but would also refer to linkages to carbon offsetting and biodiversity net gain. This is considered very positive when compared to the existing baseline, as it emphasises their importance in delivering sustainability and adapting and mitigating to the climate and biodiversity emergencies</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">+</p> <p>Trees remove carbon dioxide and other pollutants from the atmosphere, and so a policy supporting the protection of existing, and planting of new, trees would help improve air quality.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>Trees remove carbon dioxide and other pollutants from the atmosphere, and so a policy supporting the protection of existing, and planting of new, trees would help improve air quality, and have links to improving biodiversity.</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p style="text-align: center;">+</p> <p>The protection and enhancement of existing trees, alongside the creation of additional tree cover, will support the improvements of the Boroughs biodiversity. As such this policy approach is considered to have a positive effect when assessed against the existing baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.</p>	<p style="text-align: center;">+</p> <p>This policy option would seek to be similar to option 1 but would also refer to linkages to carbon offsetting and biodiversity net gain. This is considered positive when compared to the existing baseline.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>No change compared to the baseline.).</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Summary

Option 1 would seek to protect and enhance trees, woodlands and hedgerows in the Borough – providing significant benefits to health and wellbeing, addressing climate change, protecting landscape and improving biodiversity and air quality

Option 2 would seek to continue to follow the existing WLLP approach and therefore would largely have a neutral effect on the existing baseline position.

Option 3 would follow option 1 but also expressly address the potential for trees to provide carbon offset and enhance biodiversity. This is considered positive when compared to the baseline, but it would result in the doubling up of these requirements as there are other policies which will cover both biodiversity net gain and carbon offsetting.

Overall, Option 1 is considered the most sustainable, although a hybrid with Option 3 may also be appropriate.

ENVIRONMENT & HEALTH / EH07 – HEALTHY EATING AND DRINKING

- Summary of 'options':**
1. A healthy eating and drinking policy supported by a healthy eating and drinking Supplementary Planning Document (SPD).
 2. No specific policy dealing with healthy eating and drinking as it is considered there is no need to address this matter in West Lancashire.
 3. No specific policy dealing with healthy eating and drinking but dealing with these issues through [parts of] other policies in the Local Plan.
 4. Similar to option 3, having no specific healthy eating and drinking policy, but covering these issues within other Local Plan policies, and, similar to Option 1, preparing a healthy eating and drinking SPD.

Current baseline:

There is no WLLP policy as such on healthy eating and drinking, nor any current SPD. NPPF Section 8 covers 'Promoting healthy and safe communities' and paragraph 91(c) advises that planning policies and decisions should enable and support healthy lifestyles, for example through access to healthier food.

In terms of data, the baseline position is that there is a health issue relating to obesity in West Lancashire, although in very general terms, this is no worse than in other areas. There are 'hotspots' of poor health in West Lancashire (including health linked to diet, as well as lifestyle), tying in with general deprivation patterns in the Borough.

Topic	Option 1	Option 2	Option 3	Option 4
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>Having a healthy eating and drinking policy supported by a Healthy Eating and Drinking SPD should result in a positive change compared to the baseline in terms of encouraging healthier lifestyles and (to a lesser extent) reducing health inequalities; relevant planning applications would be accompanied by a health impact assessment (HIA), and there would be more control over the location of hot food take-aways.</p>	<p style="text-align: center;">0</p> <p>Given there is currently no Local Plan policy on healthy eating or drinking, this option (having no policy in the new Local Plan, and no SPD) would have no effect on this objective compared to the baseline. The same is the case for the other SA topics below.</p>	<p style="text-align: center;">+</p> <p>Not having a specific healthy eating and drinking Local Plan / SPD policy, but dealing with the issue in other Local Plan policies should still result in a positive change compared to the baseline in terms of encouraging healthier lifestyles and (to a lesser extent) reducing health inequalities. Relevant planning applications would require an HIA and there would be more control over the location of hot food take-aways.</p>	<p style="text-align: center;">+</p> <p>Not having a specific Local Plan policy on healthy eating and drinking, but dealing with the issue via other Local Plan policies and an SPD should still result in a positive change compared to the baseline in terms of encouraging healthier lifestyles and (to a lesser extent) reducing health inequalities. Relevant planning applications would require an HIA and there would be more control over the location of hot food take-aways.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Local Economy and Employment (Objectives 4-6)	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Transport (Objective 8)	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Land Resources (Objective 9)	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Cultural heritage and landscape (Objective 10)	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Biodiversity (Objective 13)	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p>0</p> <p>This option would have little or no effect on this objective, compared to the baseline. It could be argued that by increasing control over the locations of hot food take-aways, there may be some reduction in accessibility to such 'services', but this would most likely be very minor compared to the baseline.</p>	<p>0</p> <p>This option would have no effect on this objective compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline. It could be argued that by increasing control over the locations of hot food take-aways, there may be some reduction in accessibility to such 'services', but this would most likely be very minor compared to the baseline.</p>	<p>0</p> <p>This option would have little or no effect on this objective compared to the baseline. It could be argued that by increasing control over the locations of hot food take-aways, there may be some reduction in accessibility to such 'services', but this would most likely be very minor compared to the baseline.</p>

Summary

Option 1 introduces a new policy on healthy eating and drinking, compared to no current Local Plan or SPD policy; as such it has a positive effect on sustainability in terms of encouraging healthy lifestyles, and possibly also in terms of reducing health inequalities, compared to the baseline. In all other aspects of the sustainability appraisal framework, this preferred policy approach has minimal or no effect.

Option 2 proposes no policy, so is effectively the same as the baseline. It assumes there is no need to address these issues in West Lancashire; in that sense it is considered the least sustainable option as obesity / health inequalities are an issue in this Borough.

Options 3 and 4 are very similar to Option 1 in terms of their effect compared to the baseline situation. They seek to address health issues through other Local Plan policies, rather than through a specific policy. Option 3 proposes no SPD to clarify and elaborate on policy and could be argued is marginally less sustainable than Option 4.

As a Local Plan policy has more weight than an SPD policy, overall option 1 is considered the most sustainable, followed by Option 4.

TRANSPORT AND INFRASTRUCTURE / TI01 – Transport network & access

- Summary of ‘options’:**
1. A policy that sets out specific transport schemes and supports the 20-minute neighbourhood concept.
 2. To only list specific schemes that we know will be delivered.
 3. To not list any specific schemes.

Overview of current baseline: WLLP Policy IF2 sets out a number of transport schemes which the Council would support the delivery of. Aside this, the West Lancashire Highways and Transport Masterplan (LCC) lists a number of transport projects which are of importance in delivering Local Plan objectives. Option 1 is most closely aligned to the current policy approach (baseline), but with additional support lent to the concept of the 20-minute neighbourhood.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0 / +</p> <p>This policy option would have a positive effect as it would support the 20-minute neighbourhood concept, which promotes sustainability. In supporting transport infrastructure schemes, It would seek to discourage the use of the private car in favour of sustainable, and active, travel and so would have a positive effect on the health of the Borough's population as it would encourage walking and cycling within the borough and could help to improve air quality</p> <p>Therefore, this option is considered to have a positive impact when considered against the current baseline.</p>	<p style="text-align: center;">0 / -</p> <p>This approach would omit reference to schemes such as the Ormskirk Bypass and Skelmersdale Rail where there is no certainty that the schemes will be delivered. However, these 'ambitions' form important parts of strategic planning, and their delivery could help improve accessibility to a variety of opportunities which could improve people's health and wellbeing, for example employment opportunities. Their omission could therefore have negative effects on this objective.</p>	<p style="text-align: center;">-</p> <p>To not list any schemes would have a negative effect on this objective because it would limit positive planning for such transport schemes, which can have positive effects on the population in terms of widening their opportunities. Therefore, this option would be considered to have a negative effect when considered against the current baseline.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">+</p> <p>The 20-minute neighbourhood concept would support positive planning for new housing in the borough as it would get developers to think about how they link to transport networks, especially walking and cycling links, creating more sustainable housing developments.... Therefore, this option is considered to have a positive impact when considered against the current baseline.</p>	<p style="text-align: center;">+ / -</p> <p>The 20-minute neighbourhood concept would support positive planning for new housing in the borough as it would get developers to think about how they link to transport networks, especially walking and cycling links, creating more sustainable housing developments. However, the omission of some of these ambitions could have some negative effects on this objective by failing to provide sufficient strategic direction.</p>	<p style="text-align: center;">-</p> <p>To not list any schemes would have a negative effect on this objective because the absence of specific schemes, and replacement with a 'catch-all statement', would give less support to infrastructure schemes required to support new residential developments and would not promote positive or holistic planning. Therefore, this option is considered to have a negative impact when considered against the current baseline.</p>
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">+</p> <p>The option to list specific transport schemes which would be delivered would support the local economy and employment as it would allow for positive and holistic planning. Therefore, this option is considered to have a positive impact when considered against the current baseline.</p>	<p style="text-align: center;">+ / -</p> <p>The option to list specific transport schemes which would be delivered would support the local economy and employment as it would allow for positive and holistic planning. These transport 'ambitions' form important parts of strategic planning, and their delivery could help improve accessibility to a variety of opportunities, including employment. The omission of some of these ambitions could therefore have some negative effects on this objective by failing to provide direction.</p>	<p style="text-align: center;">-</p> <p>To not list any schemes would have a detrimental impact on this objective as it would fail to provide direction for new employment development. Therefore, this option is considered to have a negative impact when considered against the current baseline.</p>

Topic	Option 1	Option 2	Option 3
Transport (Objective 8)	<p style="text-align: center;">+</p> <p>This policy option would have a positive effect on the transport objective as it would support the development of transport infrastructure and linkages to new developments. Therefore, this option is considered to have a positive impact when considered against the current baseline.</p>	<p style="text-align: center;">+ / -</p> <p>This policy option would have a positive effect on the transport objective as it would support the development of transport infrastructure and linkages to new developments. However, the omission of some of these transport ambitions could have some negative effects on this objective by failing to provide sufficient strategic direction.</p>	<p style="text-align: center;">-</p> <p>To not list any potential transport schemes within the borough could restrict the identification of transport links which would support development.</p>
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>

Topic	Option 1	Option 2	Option 3
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+</p> <p>This policy option would have a positive impact on the climate change objective as it would encourage the 20 minute neighbourhood concept which could reduce the use of the private car to make shorter journeys and encourage active travel, helping to reduce carbon emissions. As such this policy option would have a positive impact when considered against the current baseline.</p>	<p style="text-align: center;">+</p> <p>This policy option would have a positive impact on the climate change objective as it would encourage the 20 minute neighbourhood concept which could reduce the use of the private car to make shorter journeys and encourage active travel, helping to reduce carbon emissions. As such this policy option would have a positive impact when considered against the current baseline.</p>	<p style="text-align: center;">0 / -</p> <p>This policy would not help to pro-actively address climate change.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>
Air quality (Objective 8)	<p style="text-align: center;">+</p> <p>This policy option would have a positive impact on the Air Quality objective as it would encourage the 20-minute neighbourhood concept which could reduce the use of the private car to make shorter journeys. As such this policy option would have a positive impact when considered against the current baseline.</p>	<p style="text-align: center;">+</p> <p>This policy option would have a positive impact on the Air Quality objective as it would encourage the 20-minute neighbourhood concept which could reduce the use of the private car to make shorter journeys. As such this policy option would have a positive impact when considered against the current baseline.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>	<p style="text-align: center;">0</p> <p>This policy option will have little or no effect compared to the baseline for this objective.</p>

Summary

Option 1 would have a positive effect on the majority of the objectives when considered against the baseline. This option would provide a list of desired schemes and would support walking and cycling linkages within the borough.

Option 2 would result in the omission of some 'ambitious' schemes, such as the Ormskirk bypass and the Skelmersdale rail link, as there is currently no certainty that they will go ahead. Whilst this approach has a positive effect on a number of objectives, this is not the most sustainable of the policy options because of the lack of direction and support this proffers.

Option 3 would not list any schemes within the policy and so would be unlikely to help positively plan for the growth of the borough. This has a negative effect on a number of the objectives and therefore is the least sustainable of all the above options.

Overall, Option 1 is considered the considered the most sustainable.

TRANSPORT AND INFRASTRUCTURE / TI02 - Parking Standards and Electric Vehicle Charging Points

- Summary of 'options':**
1. Continue the current policy approach (Adopted Local Plan Policy IF2 parts 2 and 3).
 2. A more restrictive policy to limit car parking spaces in new developments.
 3. A policy that does not restrict car parking space i.e. the standards set out in the policy would be a minimum.
 4. Do not require Electric Vehicle Charging Points.

Overview of current baseline: The baseline position is represented by the adopted Local Plan and the NPPF. WLLP Policy IF2 (parts 2 and 3) deal with parking standards for residential developments and electric vehicle charging points, respectively, with parking standards for other uses being set out at Appendix F. The NPPF primarily sets out what a local plan should do in relation to setting local parking standards (paragraph 105) and what planning applications should be required to do (paragraph 110). Option 1 therefore represents the baseline position.

Topic	Option 1	Option 2	Option 3	Option 4
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">-</p> <p>This policy option would have a negative effect upon the topic compared to the baseline. By restricting car parking, it would be less likely to improve accessibility to jobs or encourage and support the growth of sustainable rural businesses. Additionally, it would not promote access to and provision of services in rural areas.</p>	<p style="text-align: center;">+</p> <p>This policy option would have a positive effect upon the topic compared to the baseline. By not restricting car parking it may help to improve accessibility to jobs, encourage and support the growth of sustainable rural businesses and promote access to services in rural areas.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+ / -</p> <p>This policy option may improve the efficiency of the transport network and help reduce vehicular traffic and congestion if it encourages greater use of active travel and public transport. This would help to reduce emissions of greenhouse gases from vehicles and would therefore help improve air quality. However, restricting parking on new developments could cause negative knock-on effects like on-street parking, exacerbating congestion and traffic/parking issues.</p>	<p style="text-align: center;">-</p> <p>This policy option would have a negative effect upon the topic compared to the baseline. By not discouraging an increase in private vehicle use it would not improve the efficiency of the transport network and would not help reduce vehicular traffic and congestion. It would not increase access to and opportunities for walking, cycling ('active travel') and use of public transport and would therefore not reduce emissions of greenhouse gases or help improve air quality.</p>	<p style="text-align: center;">-</p> <p>This policy option would have a negative effect upon the topic compared to the baseline. It would not assist in reducing or minimising emissions of greenhouse gases and would not assist in improving air quality.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+</p> <p>This option should have a positive effect on this topic as more restrictive car parking standards may assist in achieving the efficient use of land via higher density of development in suitable areas.</p>	<p style="text-align: center;">-</p> <p>This option should have a negative effect on this topic as less restrictive car parking standards may reduce opportunities to achieve the efficient use of land via higher density of development in suitable areas.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+ / ?</p> <p>Compared to the baseline, this option may minimise the need for carbon-based energy generation / use by discouraging the use of private vehicles.</p>	<p style="text-align: center;">-</p> <p>Compared to the baseline, this option would not minimise the need for carbon-based energy generation / use because it would not discourage the use of private vehicles.</p>	<p style="text-align: center;">-</p> <p>By removing the policy requirement for Electric Vehicle Charging Points this option would not minimise the need for carbon-based energy generation / use and would therefore have a negative effect upon the topic compared to the baseline.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">+ / ?</p> <p>This policy option would have an overall likely positive effect upon the topic compared to the baseline, albeit the effect is less certain in relation to some aspects. It may help reduce vehicular traffic and congestion if it encourages greater use of active travel and public transport. This would help to reduce emissions of greenhouse gases from vehicles and would therefore help improve air quality.</p>	<p style="text-align: center;">-</p> <p>This policy option would have a negative effect upon the topic compared to the baseline. It would not help reduce vehicular traffic and congestion or increase access to and opportunities for walking, cycling ('active travel') and use of public transport and would therefore not reduce emissions of greenhouse gases or help improve air quality.</p>	<p style="text-align: center;">-</p> <p>This policy option would have a negative effect upon the topic compared to the baseline. It would not assist in reducing or minimising emissions of greenhouse gases and would not assist in improving air quality.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Local services and community infrastructure (Objectives 3 and 8)	<p>0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p>+ / ?</p> <p>This policy option may have an uncertain positive effect upon the topic compared to the baseline in that it may increase use of public transport by discouraging use of private vehicles through more restricted parking. If car parking was more restricted, it would place greater importance on ensuring services are located in areas accessible by public transport or active/sustainable travel.</p>	<p>-</p> <p>This policy option is likely to have a negative effect on this topic compared to the baseline in that by having less restrictive requirements upon car parking it would not increase access to and opportunities for walking, cycling ('active travel') and use of public transport.</p>	<p>0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Summary

Option 1 is the same as the baseline position so would have a neutral effect in terms of sustainability.

Option 2 could have a negative effect upon the local economy and employment topic but a positive effect upon the land resources topic. It may also have uncertain positive effects upon the transport, climate change, air quality and local services and community infrastructure topics with this uncertainty being a result of more restricted parking discouraging the use of private vehicles.

Option 3, by not restricting car parking, would have negative effects upon several topics (transport, land resources, climate change, air quality and local services and community infrastructure) whilst only being offset by a positive effect upon the local economy and employment topic.

Option 4 would have negative effects upon the transport, air quality and climate change topics and is inferior to the current policy represented by option 1. The NPPF does not compensate for the removal of the adopted Local Plan requirement for Electric Vehicle Charging Points as it only indicates that development should be designed to enable charging of plug-in vehicles.

Overall, options 1 or 2 are considered to be the most sustainable.

TRANSPORT AND INFRASTRUCTURE / TI03 – Digital Connectivity

- Summary of ‘options’:**
1. A flexible policy that governs communications and digital connectivity. This would support the NPPF, which sets most guidance for communications development.
 2. No policy, and instead rely on national planning policy (NPPF).
 3. A high level of control, for example by requiring new development to go beyond Part R1 of the Building Regulations 2010.

Overview of current baseline: The baseline comprises Local Plan Policy IF3: Service Accessibility and Infrastructure for Growth along with section 10 (Supporting high quality communications) of the NPPF and Part R1 of the Building Regulations. Policy IF3 contains limited references to communications and digital connectivity, comprising a requirement for development to provide essential site communications infrastructure and outlining support for the delivery of broadband and communications technology. NPPF provides greater detail, including in relation to minimising the number of masts and what should not be expected from local authorities in terms of limiting the siting of digital communications. It also details the supporting evidence required for applications. The current baseline position therefore most closely aligns with option 2, supported by some limited Local Plan policy.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic when compared to the baseline. An enhanced Local Plan policy would assist digital connectivity thus reducing isolation in the community. It could increase levels of participation in education through remote learning and improve the knowledge base. This could also improve the quality of life in deprived areas and for deprived groups.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">+ / -</p> <p>This option would have a positive effect in relation to this topic when compared to the baseline. An enhanced Local Plan policy would assist digital connectivity thus reducing isolation in the community. It could increase levels of participation in education through remote learning and improve the knowledge base. This could also improve the quality of life in deprived areas and for deprived groups. However, a too prescriptive policy would make this difficult to achieve due to its inflexibility.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic when compared to the baseline. An enhanced Local Plan policy would support businesses to achieve better digital connectivity and inclusivity.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">+ / -</p> <p>This option would have a negative effect in relation to this topic when compared to the baseline. A policy with a high level of control is more likely to be inflexible in supporting businesses. However, an enhanced Local Plan policy could support businesses to achieve better digital connectivity and inclusivity</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect on this topic compared to the baseline. It would have the potential to improve the quality of the built and historic environment by restricting the siting of digital communications equipment.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect on this topic compared to the baseline. It would have the potential to improve the quality of the built and historic environment by restricting the siting of digital communications equipment.</p>

Topic	Option 1	Option 2	Option 3
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">+ / 0</p> <p>This option would have a small positive effect in relation to this topic when compared to the baseline. It would assist in reducing isolation in the community by assisting digital connectivity and inclusivity</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would effectively represent the baseline position.</p>	<p style="text-align: center;">+ / -</p> <p>This option could have a small positive effect compared to the baseline as it could help reduce isolation in the community by assisting digital connectivity and inclusivity. However, it could have a negative effect by hindering a reduction of isolation in the community by being too inflexible.</p>

Summary

Option 1 introduces a new policy on digital connectivity in new developments, compared to minimal current Local Plan policy but with National Planning Policy Framework paragraphs 112-116 and Building Regulations standards on the matter. The positive sentiments of the option 1 result in small positive effects on sustainability in terms of the local economy and employment and local services and community infrastructure topics.

Option 2 is closest to the baseline position so would have a neutral effect in terms of sustainability, with little or no effect compared to the current baseline situation.

Option 3 would introduce a high level of control which would have a mixed effect in sustainability terms with a small positive effect upon the cultural landscape and heritage topic but potentially negative effects upon other areas due to its inflexibility and prescriptivism.

Overall, Option 1 would be the most sustainable.

TRANSPORT AND INFRASTRUCTURE / TI04 – Low Carbon and Renewable Energy

- Summary of ‘options’:**
1. Designate specific areas of opportunity for low carbon and renewable energy ('LCRE').
 2. Do not allocate any areas for low carbon and renewable energy to enable a flexible response to schemes.
 3. Require all new developments to provide renewable energy – e.g. solar panels on commercial buildings and new dwellings.

Overview of current baseline: The baseline position comprises adopted Local Plan Policy EN1: Low Carbon Development and Energy Infrastructure, the National Planning Policy Framework (paragraphs 155 and 158 in particular), National Planning Practice Guidance and Building Regulations Approved Document L (Conservation of Fuel and Power). It should be noted that some measures identified by adopted Local Plan Policy EN1 have ceased nationally, including the Code for Sustainable Homes and 'Allowable Solutions', the latter of which gave developers an economical way of compensating for the CO2 emission reductions that were difficult to achieve through normal design and construction. As such, the baseline position is broadly reflected by option 2.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0 / +</p> <p>This option would have little or no effect on this topic compared to the baseline. Should the policy encourage LCRE community energy schemes then there are opportunities for communities to benefit from cheaper, renewable electricity-delivering positives in terms of affordable heat, reduction in fuel poverty, and thereby improvements to health and wellbeing.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0 / +</p> <p>This option would have little or no effect on this topic compared to the baseline. Requiring new developments to deliver LCRE, should help reduce building energy costs, delivering positives in terms of affordable heat, reduction in fuel poverty, and thereby improvements to health and wellbeing.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2	Option 3
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">+</p> <p>This option would have a positive effect on this topic compared to the baseline. It would potentially increase the economic benefit derived from the Borough's natural environment by promoting and supporting a green economy.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

	<p style="text-align: center;">+ / 0 / -</p>	<p style="text-align: center;">0</p>	<p style="text-align: center;">+</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Land Resources (Objective 9)</p>	<p>This option may have an uncertain effect in relation to this topic as far as this relates to reducing the loss of high quality (best and most versatile) agricultural land until such areas are identified</p> <p>NPPG requires larger solar energy proposals to consider a sequence of sites / locations appropriate for such development comprising brownfield, followed by greenfield land, with poorer quality agricultural land to be used in preference to higher quality land. An approach that designates the most appropriate areas of the Borough for wind and solar energy schemes should reduce development pressure on high quality agricultural land, of which West Lancashire has a large proportion, providing that other suitable sites are available Where no 'sequentially preferred' sites exist then this may result in the use of agricultural land for LCRE uses. However, siting solar panels on land is reversible, and often agricultural uses, like sheep grazing, can continue with solar panels in situ. There should not be any significant impact on land resources, but it could result in the non-agricultural use of agricultural land (negative) or the protection of agricultural land (positive).</p>	<p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p>This option would have little or no effect on this topic compared to the baseline. LCRE would be encouraged on existing and new properties, which would help to protect greenfield / agricultural land from being used for LCRE.</p>

Topic	Option 1	Option 2	Option 3
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">+</p> <p>This option would have a positive effect in relation to this topic. Designating the most appropriate areas of the Borough for wind and solar energy schemes should guide development to protect the character and appearance of the Borough's more valuable landscapes.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">- / ?</p> <p>This option may have an uncertain negative effect in relation to this topic as far as this relates to not improving the quality of the built and historic environment. There may be a tension between requiring all new developments to provide renewable energy such as solar panels and ensuring visual aesthetics and quality, particularly in historic environments.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+</p> <p>This option would have a positive effect in relation to this topic. The proactive designation of appropriate areas of the Borough for wind and solar energy schemes would assist in minimising the need for carbon-based energy generation / use and maximising the production / deployment of renewable energy.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position. However, since the adoption of Policy EN4, the NPPF has mandated that Council's must designate specific areas for wind energy. A failure to designate specific areas means that the Council would be unable to support any proposals for wind energy, and, if taken as a wider approach with other forms of LCRE, would detrimentally impact on the Borough's ability to achieve net zero and to protect energy self-sufficiency.</p>	<p style="text-align: center;">+</p> <p>This option would have a positive effect in relation to this topic. It would assist in minimising the need for carbon-based energy generation / use and maximising the production / deployment of renewable energy. It should also encourage new developments to achieve low, and ideally zero, carbon.</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Air quality (Objective 8)	<p style="text-align: center;">+</p> <p>This option should have positive effect in relation to this topic as far as this relates to reducing emissions of greenhouse gases. The proactive approach to designating the most appropriate areas of the Borough for wind and solar energy schemes should encourage more renewable energy schemes of this nature and therefore reduce emissions of greenhouse gases.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">+</p> <p>This option would have a positive effect on this topic compared to the baseline. Requiring all new developments to provide renewable energy will reduce reliance upon fossil fuels therefore reducing emissions of greenhouse gases.</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">+</p> <p>This option would have the potential to deliver positive effects. Should the policy encourage LCRE community energy schemes then there are opportunities for communities to benefit from cheaper, renewable electricity, supporting community's self-sufficiency in relation to energy infrastructure.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Summary

Option 1 advances the existing baseline position by proactively designating the most appropriate areas of the Borough for wind and solar energy schemes. This would have positive effects in terms of sustainability in relation to the cultural heritage and landscape, climate change / climate emergency, energy and flooding, air quality and local economy and employment topics. In addition, there would be uncertain positive, or negative, effects in relation to land resources.

Option 2 would have neutral effects in terms of sustainability as it closely resembles the baseline position.

Option 3 would also have overall positive effects in terms of sustainability; with positive effects relating to the climate change / climate emergency, energy and flooding and air quality topics but would have uncertain negative effects in relation to cultural heritage and landscape.

Overall, option 1 would therefore be the most sustainable; however, option 3 would also have merit compared to the baseline situation. It should be noted that options 1 and 3 are not mutually exclusive and, if appropriate, it may be possible to combine them into a single future policy.

TRANSPORT & INFRASTRUCTURE / TI05 – Energy efficiency in new developments

- Summary of 'options':**
1. Require 'major' developments, and encourage other 'minor' developments, to deliver energy efficiency improvements above national standards, considering energy efficiency in scheme design. Developers should also be required to monitor energy efficiency improvements in their developments, to evaluate and improve performance to ultimately achieve zero net carbon goals.
 2. Require both major and minor residential and commercial developments to demonstrate how they have considered energy efficiency in their design, as a minimum in line with any national standards.
 3. Require major, but not minor, developments to demonstrate how they have considered energy efficiency in their design, as a minimum in line with, and / or above, any national standards.
 4. Have no requirements for energy efficiency in new buildings and allow developers to provide energy efficiency improvements in accordance with national building regulations only.
 5. (Part variation): Do not require developers to monitor and evaluate energy efficiency performance.
- Overview of current baseline:** National policy is set out in the NPPF but does not refer to 'energy efficiency' as such. Other national standards are set out in Part L of Building Regulations (conservation of fuel and power) and through the Future Homes Standard. The current adopted WLLP has a policy (EN1) on low carbon development and energy infrastructure, tying in with Part L of Building Regulations as a minimum, also referring to the Code for Sustainable Homes (now rescinded). Policy EN1 also has a requirement for an Energy Statement setting out how improvements are achieved.

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>This option should have no effect on this topic area. It could be argued that energy efficiency could help reduce health inefficiencies to a small extent, but there would be no, or insignificant change compared to the baseline in this respect. Improved energy efficiency in new dwellings could help address some inequalities relating to climate justice, for example responding to fuel poverty by providing houses with cheaper running costs. Requiring buildings to consider shade and cooling would aid health and wellbeing in periods of hotter temperatures and reduce heat-related illnesses.</p>	<p style="text-align: center;">+</p> <p>This option should have no effect on this topic area. As for Option 1, whilst it could be argued that energy efficiency could help reduce health inefficiencies, there would be expected to be no significant change compared to the baseline. Improved energy efficiency in new dwellings could help address some inequalities relating to climate justice, for example responding to fuel poverty by providing houses with cheaper running costs. Requiring buildings to consider shade and cooling would aid health and wellbeing in periods of hotter temperatures and reduce heat-related illnesses.</p>	<p style="text-align: center;">0</p> <p>No, or insignificant, change compared to the baseline.</p>	<p style="text-align: center;">0 / -</p> <p>Having no Local Plan requirements for energy efficiency means that only the minimum Building Regulations standards are met. It would be likely that fewer improvements could be made to improve the energy efficiency of buildings and reach net zero in advance of target dates. However, there should be no significant change compared to the baseline for this topic area.</p>	<p style="text-align: center;">0</p> <p>Having no requirement to monitor and evaluate energy efficiency performance should result in no change compared to the baseline for this topic area.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Housing (Objective 7)	<p>0</p> <p>This option should result in no, or insignificant, net effects compared to the baseline for this topic area. The baseline (WLLP policy) also has energy efficiency requirements. The new policy may have a higher standard, but the difference is not considered significant.</p>	<p>0</p> <p>This option should result in no, or insignificant, net effects compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, net effects compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, net effects compared to the baseline for this topic area. Whilst having no Local Plan-based requirement for energy efficiency could in theory improve viability, the difference is not expected to be significant as Building Regulations still apply.</p>	<p>0</p> <p>This option should result in no, or insignificant, net effects compared to the baseline for this topic area.</p>
Local Economy and Employment (Objectives 4-6)	<p>0</p> <p>This option should result in no, or insignificant, net effects compared to the baseline for this topic area. Energy efficiency requirements may cost more in the first place but should ultimately result in savings for new business.</p>	<p>0</p> <p>This option should result in no, or insignificant, net effects compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, net effects compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, net effects compared to the baseline for this topic area. Lower energy efficiency requirements may mean less cost at the outset for new business, but greater running costs, plus Building Regulations still apply.</p>	<p>0</p> <p>This option should result in no, or insignificant, net effects compared to the baseline for this topic area.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Transport (Objective 8)	0 This option should result in no difference compared to the baseline for this topic area. (Air quality is considered below.)	0 This option should result in no difference compared to the baseline for this topic area.	0 This option should result in no difference compared to the baseline for this topic area.	0 This option should result in no difference compared to the baseline for this topic area.	0 This option should result in no difference compared to the baseline for this topic area.
Land Resources (Objective 9)	0 No difference compared to the baseline for this topic area. Energy efficiency requirements may affect brownfield viability but Building Regulations still apply so differences are likely to be minor.	0 This option should result in no difference compared to the baseline for this topic area.	0 This option should result in no difference compared to the baseline for this topic area.	0 This option should result in no difference compared to the baseline for this topic area.	0 This option should result in no difference compared to the baseline for this topic area.
Cultural heritage and landscape (Objective 10)	0 This option should result in no difference compared to the baseline for this topic area.	0 This option should result in no difference compared to the baseline for this topic area.	0 This option should result in no difference compared to the baseline for this topic area.	0 This option should result in no difference compared to the baseline for this topic area.	0 This option should result in no difference compared to the baseline for this topic area.

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Climate change / the climate emergency, energy and flooding (Objective 11)	<p>+</p> <p>This option should result in positive benefits in terms of energy generation and use, and achievement of zero carbon. It is positive compared to the baseline, as the requirement is to go above national standards.</p>	<p>0 / +</p> <p>This option should result in positive benefits in terms of energy generation and use, and achievement of zero carbon. However, the baseline also requires similar measures, so the differences are limited.</p>	<p>0 / +</p> <p>This option should result in positive benefits in terms of energy generation and use, and achievement of zero carbon. However, the baseline also requires similar measures, so the differences are limited.</p>	<p>0 / -</p> <p>Having no Local Plan-based energy efficiency requirements could result in negative effects for this topic area, although as Building Regulations still apply, the differences would be limited compared to the baseline.</p>	<p>0 / -</p> <p>Having no monitoring requirement could result in negative effects for this topic area, although the differences would be expected to be limited compared to the baseline.</p>
Water quality and resources (Objective 12)	<p>0</p> <p>This option should result in no difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no difference compared to the baseline for this topic area.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Air quality (Objective 8)	<p>0 / +</p> <p>Impacts on air quality will be dependent on the type of energy being used (e.g. 100% renewable vs coal burning) at the source and so may not be directly affected by this approach. However, improving energy efficiencies mean that less energy would be needed to heat / light / cool buildings. This option should result in positive effects for this topic area. The effects would not be major compared to the baseline, which has comparable requirements.</p>	<p>0 / +</p> <p>Impacts on air quality will be dependent on the type of energy being used (e.g. 100% renewable vs coal burning) at the source and so may not be directly affected by this approach. However, improving energy efficiencies mean that less energy would be needed to heat / light / cool buildings. This option may result in positive effects for this topic area. However, the effects would be limited compared to the baseline, which has similar requirements.</p>	<p>0 / +</p> <p>Impacts on air quality will be dependent on the type of energy being used (e.g. 100% renewable vs coal burning) at the source and so may not be directly affected by this approach. However, improving energy efficiencies mean that less energy would be needed to heat / light / cool buildings. This option may result in positive effects for this topic area. However, the effects would be limited compared to the baseline, which has comparable requirements, and it does not apply to minor developments.</p>	<p>0 / -</p> <p>As for the other options, impacts on air quality will be dependent on the type of energy being used, but in general terms, improving energy efficiencies mean that less energy would be needed to heat / light / cool buildings. This option, which has no requirements for energy efficiency in new buildings, may therefore result in negative effects for this topic area. Nevertheless, Building Regulations apply, so the effects would be expected to be limited.</p>	<p>0 / -</p> <p>As for the other options, impacts on air quality will be dependent on the type of energy being used, but in general terms, improving energy efficiencies mean that less energy would be needed to heat / light / cool buildings. This option, which has no requirements for monitoring and evaluating energy efficiency performance, may result in negative effects for this topic area as more energy could possibly need to be generated. Nevertheless, Building Regulations apply, so the effects would be limited.</p>
Biodiversity (Objective 13)	<p>0</p> <p>This option should result in no, or insignificant, difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, difference compared to the baseline for this topic area.</p>

Topic	Option 1	Option 2	Option 3	Option 4	Option 5
Local services and community infrastructure (Objectives 3 and 8)	<p>0</p> <p>This option should result in no, or insignificant, difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, difference compared to the baseline for this topic area.</p>	<p>0</p> <p>This option should result in no, or insignificant, difference compared to the baseline for this topic area.</p>

Summary

Options 1-3 have few significant differences compared to the baseline, given the baseline policy position set out in the WLLP is similar in requiring meeting Building Regulations as a minimum. The positive effects relative to the baseline (under the topic areas of the climate emergency and air quality) are the most marked for Option 1 as this requires energy efficiency improvements above national standards for major development and encourages them for minor development.

For Options 2 and 3, the positive effects compared to the baseline are less marked as Option 2 only requires energy efficiency in line with national standards, and Option 3 only applies to major developments, and could be either in line with, or above, national standards.

Option 4 has negative effects compared to the baseline for the topic areas of the climate emergency, and air quality, given its lack of local plan requirements to exceed national standards. (The baseline encourages going above national standards, or at least anticipates national standards increasing over time.)

Option 5 is considered only to have minor effects compared to the baseline for the above two topic areas, as it is not guaranteed that a lack of monitoring and evaluation would actually result in lower energy efficiency standards, or if it did, these would not be expected to be significant.

Overall, Option 1 is considered to be the most sustainable, followed by Option 3.

TRANSPORT AND INFRASTRUCTURE / TI06 – Water efficiency in new residential developments

- Summary of ‘options’:**
1. To introduce tighter, local restrictions, above that of the minimum optional Building Regulation standards, to improve water efficiency in new residential developments.
 2. Do not have a policy; rely instead on Building Regulations to deliver water efficiency.

Overview of current baseline: There is no WLLP policy dealing with water efficiency in new developments, nor any current SPD. There are no explicit references to water efficiency in the NPPF but there are more general references to water management and that local plan policies should support measures to ensure the future resilience of communities and infrastructure to climate change impacts. NPPG (Housing: optional technical standards) indicates how a tighter water efficiency standard may be required in new dwellings. Building Regulations Approved Document G provides guidance on the supply of water to a property, including water efficiency i.e. an easily accessible water supply that doesn’t incur wastage. This relates to the use of fittings in relation to water consumption, e.g. for a toilet, and is optional. However, there is an overall mandatory national requirement for all new homes to meet the usage standard set out in Building Regulations of 125 litres/person/day. Option 2 therefore represents the baseline position.

Topic	Option 1	Option 2
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Topic	Option 1	Option 2
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Topic	Option 1	Option 2
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Topic	Option 1	Option 2
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">+</p> <p>Having a water efficiency in new developments policy should result in a positive change compared to the baseline by helping to improve resilience to the likely effects of climate change. As a result of climate change, the amounts and frequency of rainfall will change. Winters will be wetter, and summers will become hotter and more prolonged and this will result in increased pressure on water resources.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">+</p> <p>Having a water efficiency in new developments policy should result in a positive change compared to the baseline by helping to minimise effects upon water supply and, to some extent, reducing the amount of wastewater generated by development. This would help to ensure an adequate supply of water as better water efficiency means that new homes will use less water.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Topic	Option 1	Option 2
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Topic	Option 1	Option 2
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Summary

Option 1 introduces a new policy on water efficiency in new developments, compared to no current Local Plan policy and optional Building Regulations standards on the matter. As such it has a positive effect on sustainability in terms of helping to improve resilience to the likely effects of climate change by improving water efficiencies and so reducing demand on the water supply and, to some extent, reducing the amount of wastewater generated by development. In all other aspects of the sustainability appraisal framework, this preferred option has little or no effect compared to the baseline situation.

Option 2 proposes no policy, so is the same as the baseline. It assumes there is no need to expressly address the issue in West Lancashire; in that sense it is considered less sustainable than option 1.

Using water resources more efficiently is a global issue that policy at the local level can contribute towards and therefore option 1 is the most sustainable.

OTHER POLICIES / OT01 – Sequential Tests

- Summary of ‘options’:**
1. A Sequential Test Policy comprising retail and other town centre uses on sites outside centres and proposals at risk from flooding. This is about guiding new town centre uses to town centres as a first priority, then edge of town centre sites and finally out of centre locations that are accessible. In relation to flood risk, it entails guiding new development towards sites at less risk of flooding from all sources
 2. To not have a Local Plan sequential test policy and rely on national planning advice instead
 3. Setting out the approach to undertaking a sequential test, as outlined by option 1, in separate town centre and flood risk policies
 4. Existing Local Plan Policy GN5: Sequential Tests. This relates to retail and other town centre uses on sites outside centres; proposals at risk from flooding; affordable housing, employment uses and community facilities on Protected Land; affordable Housing or Gypsy and Traveller sites in the Green Belt; and accommodation for temporary agricultural / horticultural workers
- Overview of current baseline:** There is an existing WLLP policy on sequential tests (Policy GN5) as well as the matter being covered by the National Planning Policy Framework sections 7 (Ensuring the vitality of town centres) and 14 (Meeting the challenge of climate change, flooding and coastal change) and supported by National Planning Practice Guidance. This is the baseline situation and represents option 4.

Topic	Option 1	Option 2	Option 3	Option 4
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline. This is because the baseline (represented by option 4) simply details how to undertake a satisfactory sequential test. Reducing the uses to which the sequential test applies would have no effect in terms of sustainability as other local plan policies indicate the sequence to be followed in establishing site / a proposal's suitability.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline. This is because the baseline (represented by option 4) simply details how to undertake a satisfactory sequential test. Omitting the sequential test policy from the local plan would have no effect in terms of sustainability as other local plan policies indicate the sequence to be followed in establishing site / a proposal's suitability.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline. This is because the baseline (represented by option 4) simply details how to undertake a satisfactory sequential test. Reducing the uses to which the sequential test applies would have no effect in terms of sustainability as other local plan policies indicate the sequence to be followed in establishing site / a proposal's suitability.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline. This is because the baseline (represented by option 4) simply details how to undertake a satisfactory sequential test. Reducing the uses to which the sequential test applies would have no effect in terms of sustainability as other local plan policies indicate the sequence to be followed in establishing site / a proposal's suitability.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline. This is because the baseline (represented by option 4) simply details how to undertake a satisfactory sequential test. Omitting the sequential test policy from the local plan would have no effect in terms of sustainability as other local plan policies indicate the sequence to be followed in establishing site / a proposal's suitability.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline. This is because the baseline (represented by option 4) simply details how to undertake a satisfactory sequential test. Reducing the uses to which the sequential test applies would have no effect in terms of sustainability as other local plan policies indicate the sequence to be followed in establishing site / a proposal's suitability.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline. This is because the baseline (represented by option 4) simply details how to undertake a satisfactory sequential test. Reducing the uses to which the sequential test applies would have no effect in terms of sustainability as other local plan policies indicate the sequence to be followed in establishing site / a proposal's suitability.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline. This is because the baseline (represented by option 4) simply details how to undertake a satisfactory sequential test. Omitting the sequential test policy from the local plan would have no effect in terms of sustainability as other local plan policies indicate the sequence to be followed in establishing site / a proposal's suitability.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline. This is because the baseline (represented by option 4) simply details how to undertake a satisfactory sequential test. Reducing the uses to which the sequential test applies would have no effect in terms of sustainability as other local plan policies indicate the sequence to be followed in establishing site / a proposal's suitability.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it closely resembles the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Topic	Option 1	Option 2	Option 3	Option 4
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>

Summary

Options 1, 2 and 3 differ in composition compared to the baseline, but all would be equally sustainable as the baseline position because all also have neutral effects in terms of sustainability. This is because the policy approach simply gives clarity relating to technical matters of how to undertake a satisfactory sequential test. Therefore, this deals with the quality of the test i.e. how to do it. Other local plan policies detail additional uses of relevance and circumstances (other than town centre uses and flood risk which are covered by national advice) and the sequence to be followed in establishing site / a proposal's suitability for those uses. What other uses that are listed in the sequential test as alternative policy approaches is therefore irrelevant in varying the assessment of them in terms of sustainability.

Option 4 follows the current local plan policy approach in West Lancashire and, along with national planning advice, this represents the baseline; as such it has a neutral effect in terms of sustainability. .

As such, all options 1-4 are equally sustainable and the choice of option would be determined by other matters e.g. option 3 unduly repeats policy.

OTHER POLICIES / OT02 – Viability

- Summary of ‘options’:**
1. A general 'hierarchy of viability', reflecting the priorities of the Local Plan, and 'ranking' the desirable outcomes that should be achieved (e.g. Affordable housing, biodiversity net gain, infrastructure). The policy would also include criteria for demonstrating viability (e.g. marketing)
 2. Have a very rigid policy that only allows the set 'hierarchy' to be followed with no variation from it. The approach for demonstrating viability (e.g. marketing) would also be stricter than under current policy GN4.
 3. Have a more relaxed policy that essentially allows applicants to choose the desirable outcomes they want with very few or even no criteria to be satisfied. The approach for demonstrating viability (e.g. marketing) would be less strict than under current policy GN4.

Overview of current baseline: WLLP Policy GN4 takes a flexible approach, to allow some deviation from policy where it can be demonstrated that a use is no longer viable and marketing evidence shows there is no demand for that use. The importance of viability repeats itself through the NPPF, and further guidance can be found in the MHCLG Guidance Note on Viability. Option 1 is most closely aligned to the existing baseline, but includes additional requirements relating to a viability hierarchy.

Topic	Option 1	Option 2	Option 3
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">+</p> <p>This approach would continue current policy GN4 in relation to demonstrating viability. In addition, it would also 'rank' the desirable outcomes that should be achieved through new development, based on viability evidence. This would mean that those outcomes deemed most important, for example affordable housing, would be prioritised for delivery. At present, until evidence details the relative costs of each requirement, it cannot be known which requirements this would be. However, this approach would likely be most flexible to delivering improvements to benefit the Borough's population, health and social inclusion (affordable housing, infrastructure) whilst protecting against the loss of key community, retail or employment facilities.</p>	<p style="text-align: center;">+ / -</p> <p>This approach would introduce a stricter policy than the current baseline (GN4). Whilst, in theory, this could deliver greater improvements for the Borough's population, in reality, an inflexible policy would likely mean that developments would not go ahead because of viability issues, or the re-use of non-viable premises would not occur, meaning that the 'knock-on' benefits would not be delivered.</p>	<p style="text-align: center;">-</p> <p>This approach would introduce a weaker policy than the current baseline (GN4). Applicants would be able to choose those outcomes they want, with the likely result that very few, or no, requirements would be delivered. This would mean that the 'knock-on' benefits would also be very unlikely to be delivered. Typically, these requirements (affordable housing, open space etc) help improve health and social wellbeing.</p>

Topic	Option 1	Option 2	Option 3
Housing (Objective 7)	<p style="text-align: center;">?</p> <p>This approach would continue current policy GN4 in relation to demonstrating viability. In addition, it would also 'rank' the desirable outcomes that should be achieved through new development, based on viability evidence. This would mean that those outcomes deemed most important, for example affordable housing, would be prioritised for delivery. At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help meet the housing needs of sections of society. There is the potential for it to help deliver affordable housing .</p>	<p style="text-align: center;">?</p> <p>This approach would introduce a stricter policy than the current baseline (GN4). At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help meet the housing needs of sections of society.</p>	<p style="text-align: center;">?</p> <p>This approach would introduce a weaker policy than the current baseline (GN4). At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help meet the housing needs of sections of society.</p>

Topic	Option 1	Option 2	Option 3
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This approach would continue current policy GN4 in relation to demonstrating viability, and so protect against the loss of commercial premises unless poor viability could be demonstrated.</p>	<p style="text-align: center;">+ / -</p> <p>This approach would introduce a stricter policy than the current baseline (GN4). Whilst this would protect more against the loss of commercial premises, it would be less flexible in those cases where poor viability was demonstrated making it harder to support changes of use and support sustainable settlements.</p>	<p style="text-align: center;">-</p> <p>This approach would introduce a weaker policy than the current baseline (GN4). It would make it harder to protect against the loss of commercial premises to other uses.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>

Topic	Option 1	Option 2	Option 3
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective. Continuing policy GN4, with a flexible approach to considering viability, would help support the re-use of heritage buildings, e.g. listed buildings.</p>	<p style="text-align: center;">-</p> <p>A stricter policy, than the current baseline (GN4), could make it more difficult to redevelop, and so protect, cultural heritage buildings.</p>	<p style="text-align: center;">0</p> <p>A weaker policy, than the current baseline (GN4) could help support the re-use of heritage buildings, although it would be unlikely that any 'knock-on' benefits would be secured.</p>

Topic	Option 1	Option 2	Option 3
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">? / +</p> <p>This approach would continue current policy GN4 in relation to demonstrating viability. In addition, it would also 'rank' the desirable outcomes that should be achieved through new development, based on viability evidence. This would mean that those outcomes deemed most important, for example energy/water efficient housing, would be prioritised for delivery. At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help meet domestic carbon reduction targets There is the potential for it to support energy efficient housing or to create sustainable settlements.</p>	<p style="text-align: center;">? / + / -</p> <p>This approach would introduce a stricter policy than the current baseline (GN4). At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help meet the housing needs of sections of society. In theory, it could help ensure energy efficiencies are prioritised, so meeting carbon reduction targets, but it could also mean a number of requirements would ultimately prevent any developments / benefits from being delivered.</p>	<p style="text-align: center;">? / -</p> <p>This approach would introduce a weaker policy than the current baseline (GN4). At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help meet carbon reduction targets. It would be expected that very few, or no, requirements would be delivered, making it harder to respond to the climate emergency.</p>

Topic	Option 1	Option 2	Option 3
Water quality and resources (Objective 12)	<p style="text-align: center;">? / +</p> <p>This approach would continue current policy GN4 in relation to demonstrating viability. In addition, it would also 'rank' the desirable outcomes that should be achieved through new development, based on viability evidence. This would mean that those outcomes deemed most important, for example energy/water efficient housing, would be prioritised for delivery. At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help improve water resources.</p>	<p style="text-align: center;">? / + / -</p> <p>This approach would introduce a stricter policy than the current baseline (GN4). At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help meet the housing needs of sections of society. In theory, it could help ensure water efficiencies are prioritised but it could also mean a number of requirements would ultimately prevent any developments / benefits from being delivered.</p>	<p style="text-align: center;">? / -</p> <p>This approach would introduce a weaker policy than the current baseline (GN4). At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help improve water efficiencies. It would be expected that very few, or no, requirements would be delivered, making it harder to deliver these improvements.</p>
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this objective.</p>

Topic	Option 1	Option 2	Option 3
Biodiversity (Objective 13)	<p style="text-align: center;">? / +</p> <p>This approach would continue current policy GN4 in relation to demonstrating viability. In addition, it would also 'rank' the desirable outcomes that should be achieved through new development, based on viability evidence. This would mean that those outcomes deemed most important, for example biodiversity net gain, would be prioritised for delivery. At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help improve biodiversity.</p>	<p style="text-align: center;">? / + / -</p> <p>This approach would introduce a stricter policy than the current baseline (GN4). At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help deliver improvements to biodiversity. In theory, it could help ensure biodiversity net gain is prioritised but it could also mean a number of requirements would ultimately prevent any developments / benefits from being delivered.</p>	<p style="text-align: center;">? / -</p> <p>This approach would introduce a weaker policy than the current baseline (GN4). At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help improve biodiversity. It would be expected that very few, or no, requirements would be delivered, making it harder to deliver these improvements.</p>

Topic	Option 1	Option 2	Option 3
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">? / +</p> <p>This approach would continue current policy GN4 in relation to demonstrating viability. In addition, it would also 'rank' the desirable outcomes that should be achieved through new development, based on viability evidence. This would mean that those outcomes deemed most important, for example community infrastructure, would be prioritised for delivery. At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help improve community infrastructure.</p>	<p style="text-align: center;">? / + / -</p> <p>This approach would introduce a stricter policy than the current baseline (GN4). At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help deliver improvements to community infrastructure. In theory, it could help support the delivery of community infrastructure but it a high number of requirements could also mean developments / benefits may ultimately not be delivered.</p>	<p style="text-align: center;">? / -</p> <p>This approach would introduce a weaker policy than the current baseline (GN4). At present, until evidence details the relative costs of each requirement, and a priority for them is established, it cannot be known whether this approach would help improve community infrastructure. It would be expected that applicants would choose to deliver very few, or no, requirements, making it harder to deliver improvements to community infrastructure.</p>

Summary

Option 1 is considered the most sustainable option, maintaining the current policy GN4, but with an added approach to 'rank' the desirable outcomes that should be achieved through new development, based on viability evidence. Option 1 promotes the greatest flexibility in approach, balancing viability considerations with achieving the greatest 'knock-on' benefits possible, via a hierarchy, informed by evidence.

Option 2 would introduce a stricter policy than the current baseline position. At this stage, without the viability evidence, the level of impact on sustainability cannot truly be known – in theory it could help greater support delivery of benefits, but a higher number of requirements could also mean developments / benefits may ultimately not be delivered as they could be rendered unviable.

Option 3 would introduce a weaker policy than the current baseline position. It would be expected that applicants would choose to deliver very few, or no, requirements meaning that few benefits would be delivered, and/or there would be less control in ensuring that the 'higher priority' items are delivered.

Overall, Option 1 is considered the most sustainable.

OTHER POLICIES / OT03 – Developer Contributions

- Summary of ‘options’:**
1. To follow the current local plan policy approach of requiring certain developments to provide a development contribution towards funding or delivering new infrastructure requirements.
 2. To not have a policy requiring developer contributions.

Overview of current baseline: There is an existing WLLP policy on developer contributions (Policy IF4) and the Community Infrastructure Levy (CIL) is operative in West Lancashire. There is also an SPD (Provision of Public Open Space in New Residential Developments) dealing with planning obligations (Section 106 legal agreements) and NPPF Section 4 covers 'Planning conditions and obligations' including setting out the 3 tests for when obligations may be sought. This is the baseline situation and represents option 1.

The baseline position allows the local authority to raise CIL funds from developers who are undertaking new building projects in the area and the money can be used to pay for a wide range of infrastructure that is needed to support new development. Planning obligations can be used where they are necessary to make a proposed development acceptable.

Topic	Option 1	Option 2
Population, Health and Social Inclusion (Objectives 1-3)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have a small negative effect on this topic compared to the baseline. Whilst there would be no Local Plan policy requiring developer contributions, both the Community Infrastructure Levy and planning obligations could still be used to deliver infrastructure and affordable housing. However, the opportunity to review / update (or even add to) existing supplementary planning advice may be reduced. As there is an existing Provision of Public Open Space in New Residential Developments SPD, which could require review, there may therefore be a small negative effect upon opportunities to enhance areas of public open and recreational space, and Green Infrastructure. In relation to this topic, they support opportunities for physical and mental health improvement.</p>
Housing (Objective 7)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2
Local Economy and Employment (Objectives 4-6)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Transport (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2
Land Resources (Objective 9)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Cultural heritage and landscape (Objective 10)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2
Climate change / the climate emergency, energy and flooding (Objective 11)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Water quality and resources (Objective 12)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2
Air quality (Objective 8)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>
Biodiversity (Objective 13)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0</p> <p>This option would have little or no effect on this topic compared to the baseline.</p>

Topic	Option 1	Option 2
Local services and community infrastructure (Objectives 3 and 8)	<p style="text-align: center;">0</p> <p>This option would have no effect in relation to this topic as it would represent the baseline position.</p>	<p style="text-align: center;">0 / -</p> <p>This option would have a small negative effect on this topic compared to the baseline. Whilst there would be no Local Plan policy requiring developer contributions both the Community Infrastructure Levy and planning obligations could still be used to deliver infrastructure and affordable housing. However, the opportunity to review / update (or even add to) existing supplementary planning advice may be reduced. As there is an existing Provision of Public Open Space in New Residential Developments SPD, which could require review, there may therefore be a small negative effect upon opportunities to improve the quantity and quality of, and access to, areas of open and recreational space, and to Green Infrastructure in general.</p>

Summary

Option 1 follows the current local plan policy approach in West Lancashire of requiring certain developments to provide a development contribution towards funding or delivering new infrastructure requirements. As this represents the baseline, it has a neutral effect in terms of sustainability.

Option 2 (to not have a policy requiring developer contributions) would still enable both the Community Infrastructure Levy and planning obligations to be used to deliver infrastructure and affordable housing, but it is slightly less sustainable in relation to the population, health and social inclusion and the local services and community infrastructure topics.

Therefore Option 1, whilst neutral, is the more sustainable of the two.

Habitats Regulations Assessment of the West Lancashire Local Plan

Screening for Likely Significant Effects

West Lancashire Borough Council

60662021

Quality information

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1. Background

Introduction

- 1.1 AECOM was appointed by West Lancashire Borough Council (hereafter referred to as 'WLBC') to assist the Council in undertaking a Habitats Regulations Assessment of its Issues & Options Regulation 18 draft policy approaches. The objective of this assessment was to identify any aspects of the Plan that would potentially cause Likely Significant Effects (LSEs) on the National Site Network, also known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), candidate Special Areas of Conservation (cSACs), potential Special Protection Areas (pSPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects. The LSEs screening exercise is to be followed by an assessment of the Reg. 18 preferred site allocations and development requirements, and the Reg. 19 Local Plan.
- 1.2 The UK is bound by the terms of the Conservation of Habitats and Species Regulations 2017, as amended. An Appropriate Assessment of identified impact pathways is required, where a plan or project is likely to result in LSEs upon a European Site, either individually or 'in combination' with other projects.
- 1.3 The West Lancashire Local Plan seeks to meet housing and employment needs within the Borough without compromising the built and natural environment. It will identify requirements for growth across West Lancashire, including where this will occur throughout the Plan period (2023 – 2040). For example, the draft Plan's Vision indicates that the three main settlements of Skelmersdale, Ormskirk and Burscough are likely to continue to see significant development. At the same time, one of the draft Plan's main objectives is to sustain a flourishing natural environment and improve its network of green spaces and waterways. This HRA focuses on high-level screening of policy options, given that the exact quanta and locations of residential and employment development are not yet confirmed.
- 1.4 An initial review of the European sites surrounding West Lancashire and the potential impact pathways linked to the Local Plan, indicates that multiple European sites require consideration. Most designated sites within 15km are designated for overwintering waterfowl, waders and breeding seabirds, including the Martin Mere SPA / Ramsar, Ribble & Alt Estuaries SPA / Ramsar and Mersey Narrows & North Wirral Foreshore SPA / Ramsar. Two sites (e.g. the Sefton Coast SAC and Dee Estuary SAC) are designated for sensitive habitats. One of the main HRA issues in the heavily urbanised wider Liverpool City Region (LCR) to the south is coastal recreation and resulting disturbance to qualifying birds. Along various stretches of coastline, bird populations are declining, which has been largely attributed to human disturbance. As a result, authorities in the LCR are adopting a concerted effort to mitigate recreational pressure impacts in the Recreation Mitigation and Avoidance Strategy (RMAS). At the same time, it is important to note that the key population centres of West Lancashire are a considerable distance from the coast (10km or more) and lie beyond the much larger and closer settlements within the LCR. The implication of the West Lancashire Local Plan in relation to bird disturbance will be discussed in this HRA.

Legislative Context

- 1.5 The need for an assessment of impacts on European sites is set out within the Conservation of Habitats and Species Regulations 2017.
- 1.6 The Regulations apply the precautionary principle¹ to European Sites. Consent should only be granted for plans and projects once the relevant competent authority has ascertained that there

¹ The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: "When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis".

will either be no likelihood of significant effects, or no adverse effect on the integrity of the European Site(s) in question. Where an Appropriate Assessment has been carried out and results in a negative impact, or if uncertainty remains over the significant effect, consent will only be granted if there are no alternative solutions and there are Imperative Reasons of Over-riding Public Interest (IROPI) for the development and compensatory measures have been secured.

- 1.7 To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question. The competent authority is entitled to request the applicant to produce such information as the competent authority may reasonably require for the purposes of the assessment, or to enable it to determine whether an appropriate assessment is required. Figure 1 provides the legislative basis for an Appropriate Assessment.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... must make an appropriate assessment of the implications for the plan or project in view of that site’s conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.”

Figure 1. The legislative basis for Appropriate Assessment

- 1.8 Over the years, ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of ‘Appropriate Assessment’. Throughout this Report the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

Scope of the Project

- 1.9 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways (called the source-pathway-receptor model) rather than by arbitrary ‘zones’. Current guidance suggests that the following European sites be included in the scope of assessment:

- All sites within West Lancashire Borough boundary; and,
- Other sites shown to be linked to development within the borough through a known ‘pathway’ (discussed below).

- 1.10 Briefly defined, pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a European designated site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could then affect European sites by, for example, disturbance of wintering or breeding birds.

- 1.11 Guidance from the Ministry of Housing, Communities and Local Government (MHCLG) states that the HRA should be ‘*proportionate to the geographical scope of the [plan policy]*’ and that ‘*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*’ (MHCLG, 2006, p.6). More recently, the Court of Appeal² ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be ‘achieved in practice’ to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy document)³. In this case the High Court ruled that for ‘*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the*

² No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

³ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations’.

1.12 In order to fully inform the HRA process, a number of recent studies have been consulted to determine Likely Significant Effects (LSEs) that could arise from the draft Local Plan. These include:

- Future development proposed (and, where available, HRAs) for Fylde, South Ribble, Chorley, Wigan, St Helens, Knowsley and Sefton;
- Visitor survey and bird disturbance fieldwork undertaken across coastal and estuarine SSSIs in the north-west of England⁴;
- The UK Air Pollution Information System (www.apis.ac.uk); and
- The Multi Agency Geographic Information for the Countryside (MAGIC) and its links to the JNCC website (www.magic.gov.uk)

Quality Assurance

1.13 This report was undertaken in line with AECOM’s Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.

1.14 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2017).

⁴ Liley D., Panter C., Marsh P. & Roberts J. (2017). Recreational activity and interactions with birds within the SSSIs on the North-West coast of England. Footprint Ecology report for Natural England. 127pp.

2. Methodology

Introduction

- 2.1 The HRA has been carried out with reference to the general EC guidance on HRA⁵ and that produced in July 2019 by the UK government⁶; Natural England has produced its own internal guidance⁷. These have been referred to in undertaking this HRA.
- 2.2 Figure 2 below outlines the stages of HRA according to current EC guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations, and any relevant changes to the plan until no significant adverse effects remain.

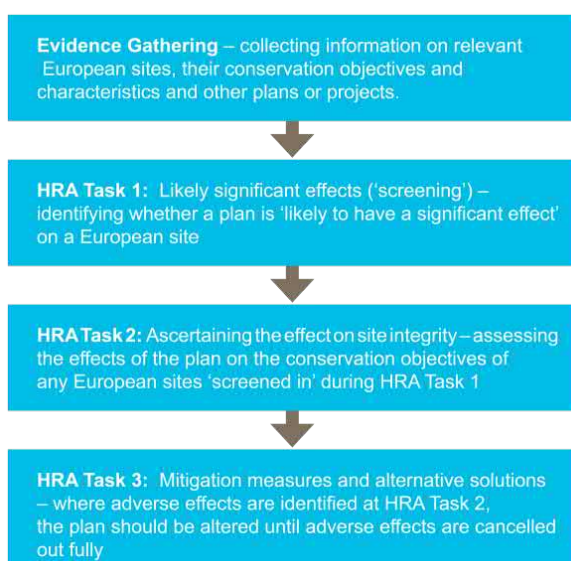


Figure 2. Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001¹.

Description of HRA Tasks

HRA Task 1 – Screening for Likely Significant Effects (LSEs)

- 2.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

- 2.4 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is undertaken in Chapter 5 of this report and in Appendix 2.

HRA Task 2 – Appropriate Assessment (AA)

- 2.5 Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no

⁵ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁶ <https://www.gov.uk/guidance/appropriate-assessment>

⁷ http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

particular technical analyses, or level of technical analysis, that are classified by law as belonging to Appropriate Assessment rather than determination of likely significant effects.

- 2.6 By virtue of the fact that it follows Screening, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment would take any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).
- 2.7 A decision by the European Court of Justice⁸ in 2018 concluded that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. That ruling has been taken into account in producing this HRA.
- 2.8 Also, in 2018 the Holohan ruling⁹ was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that '*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*' [emphasis added]. This ruling has been taken into account in the HRA process, particularly regarding the qualifying wader, waterfowl and seabird species of the Martin Mere SPA / Ramsar, Ribble & Alt Estuaries SPA / Ramsar and the Mersey Narrows & North Wirral Foreshore SPA / Ramsar, which are known to rely on foraging and roosting habitats beyond the site boundaries.

HRA Task 3 – Avoidance and Mitigation

- 2.9 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.10 In evaluating significance, AECOM has relied on professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites considered within this assessment. When discussing 'mitigation' for a Local Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since the Local Plan document is a high-level policy document.

Physical Scope of the HRA

- 2.11 There are no standard criteria for determining the ultimate physical scope of an HRA. Rather, the source-pathway-receptor model should be used to determine whether there is any potential pathway connecting development to any European sites. In the case of West Lancashire Borough, it was decided that this HRA would focus on the following European sites:
- Martin Mere SPA / Ramsar;
 - Ribble & Alt Estuaries SPA / Ramsar;
 - Mersey Narrows & North Wirral Foreshore SPA / Ramsar;
 - Liverpool Bay SPA;

⁸ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

⁹ Case C-461/17

- Sefton Coast SAC; and
- Dee Estuary SAC.

2.12 An introduction to these sites, their qualifying features, their conservation objectives, and the current pressures and threats to site integrity is provided in Chapter 3. Appendix 1 shows these European sites in relation to the boundary of West Lancashire Borough. This was based upon a 15km search zone around the Borough boundary. It should be noted that the presence of a conceivable pathway linking the Borough to a European site does not mean that LSEs will occur.

3. Relevant European Sites

Martin Mere SPA / Ramsar

Introduction

- 3.1 The Martin Mere SPA / Ramsar is a wetland nature reserve managed by the Wildfowl and Wetlands Trust. It occupies a site comprising a former lake and mire, which extended over 1,300ha of the Lancashire coastal plain in the 17th century. Until it was drained, Martin Mere was the largest freshwater body in England. Active management of the mere began in 1692, with most remaining sections of land now in agricultural use. The land levels have dropped by as much as 4m over the last 100 years as a result of hundreds of years of land drainage. Agriculture is a protected use in Martin Mere, with a pumped drainage system keeping agricultural land adjacent to the SPA / Ramsar dry.
- 3.2 Today, the SPA / Ramsar comprises open water, seasonally flooded marsh and damp hay meadows overlying peat. The site harbours a large refuge for wintering, passage and breeding birds, including significant numbers of Bewick's swans *Cygnus columbianus bewickii*, whooper swans *Cygnus cygnus*, pink-footed geese *Anser brachyrhynchus* and pintail *Anas acuta*. The SPA / Ramsar is a significant component of the network of sites that includes nearby estuarine and coastal sites in the wider Liverpool area.

SPA Qualifying Features¹⁰

Qualifying individual species listed in Annex I of the Wild Birds Directive (Article 4.1):

- 3.3 During the non-breeding season, the SPA regularly supports:
- Bewick's swan *Cygnus columbianus bewickii*
 - Whooper swan *Cygnus cygnus*
 - Pink-footed goose *Anser brachyrhynchus*
 - Eurasian teal *Anas crecca*
 - Northern pintail *Anas acuta*

Qualifying assemblage of species (Article 4.2)

- 3.4 During the non-breeding season, the SPA regularly supports an assemblage of waterfowl of more than 20,000 birds. Over winter, the site regularly supports 46,196 individual waterfowl (5 year peak mean 1991/2 – 1995/6) including: pochard *Aythya farina*, mallard *Anas platyrhynchos*, teal *Anas crecca*, wigeon *Anas penelope*, pintail *Anas acuta*, pink-footed goose *Anser brachyrhynchus*, whooper swan *Cygnus cygnus* and Bewick's swan *Cygnus columbianus bewickii*.
- 3.5 Three broad supporting habitats are important for sustaining the waterfowl assemblage and its component species through the provision of food, shelter and refuge from human disturbance. These habitats are therefore important for the maintenance of favourable conservation status of the waterbird assemblage. The broad habitats are:
- Open standing water and other adjacent waterbodies
 - Lowland damp neutral grassland
 - Swamp and tall herb fen
 - Arable land outside of SPA used for feeding

¹⁰ <http://publications.naturalengland.org.uk/publication/4833056372293632> [Accessed on the 21/06/2021]

Ramsar Qualifying Features¹¹

3.6 The site qualifies as a Ramsar site due to the following criteria:

Ramsar Criterion 5 – Assemblages of international importance

Species with peak counts in winter: 25,306 waterfowl (5 year peak mean 1998/9 – 2002/3)

Ramsar Criterion 6 – Species / populations occurring at levels of international importance

Species with peak counts in spring / autumn

- Pink-footed goose *Anser brachyrhynchus*; 8,186 individuals, representing an average of 3.4% of the Greenland, Iceland, UK population (5 year peak mean 1998/9 – 2002/3)

Species with peak counts in winter

- Tundra swan *Cygnus columbianus bewickii*; 61 individuals, representing an average of 0.7% of the GB population (5 year peak mean 1998/9 – 2002/3)
- Whooper swan *Cygnus cygnus*; 1,320 individuals, representing an average of 6.3% of the Iceland / UK / Ireland population (5 year peak mean 1998/9 – 2002/3)
- Eurasian wigeon *Anas Penelope*; 3,062 individuals, representing an average of 0.7% of the GB population (5 year peak mean 1998/9 – 2002/3)
- Northern pintail *Anas acuta*; 415 individuals, representing an average of 1.4% of the GB population (5 year peak mean 1998/9 – 2002/3)

SPA Conservation Objectives¹²

3.7 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

3.8 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Threats & Pressures to Site Integrity¹³

3.9 The following threats and pressures to the site integrity of the Martin Mere SPA have been identified in Natural England's Site Improvement Plan:

- Hydrological changes
- Invasive species
- Water pollution

3.10 In addition to this list, the Supplementary Advice on the Conservation Objectives indicate that loss of functionally linked habitat, interference with bird movements and air pollution could also

¹¹ <https://jncc.gov.uk/jncc-assets/RIS/UK11039.pdf> [Accessed on the 21/06/2021]

¹² <http://publications.naturalengland.org.uk/publication/4833056372293632> [Accessed on the 21/06/2021]

¹³

<http://publications.naturalengland.org.uk/publication/6181803727519744#:~:text=The%20plan%20provides%20a%20high,the%20condition%20of%20the%20features.> [Accessed on the 21/06/2021]

result in significant negative effects. The Supplementary Advice also notes that throughout the site, visitors are generally restricted to pathways in order to access hides to control the level of disturbance to wildlife.

Ribble & Alt Estuaries SPA / Ramsar

Introduction

- 3.11 The Ribble & Alt Estuaries SPA / Ramsar lies on the coast of Lancashire and Sefton in northwest England, comprising extensive areas of sandflats, mudflats, saltmarsh, and grazing marsh (the latter two particularly in the lower stretches of the River Ribble). The large area includes two estuaries (R. Ribble and R. Alt), which in turn comprise part of the chain of west coast sites that fringe the Irish Sea. The southern limit of the SPA / Ramsar is formed by the sand dunes in the Sefton Coast SAC.
- 3.12 The site supports internationally important populations of breeding and wintering seabirds, wildfowl and waders. The sand dunes support vegetation communities and amphibian populations of international importance. Pressure on this site largely stems from its proximity to a large urban population, including recreational as well as development pressures. Beach recreation (e.g. motorsports carried out in the intertidal zone) is a particular recreation concern with the potential to disturb roosting flocks and ground-nesting birds. Low-lying aircrafts have also been reported to disturb bird roosts in the SPA / Ramsar. Furthermore, recreational pressure concentrates around the coastal path, which is frequently used by cyclists and horse riders.

SPA Qualifying Features¹⁴

Qualifying individual species listed in Annex I of the Wild Birds Directive (Article 4.1):

3.13 During the non-breeding season, the SPA regularly supports:

- Bewick's swan *Cygnus columbianus bewickii*
- Whooper swan *Cygnus cygnus*
- Pink-footed goose *Anser brachyrhynchus*
- Common shelduck *Tadorna tadorna*
- Eurasian wigeon *Anas Penelope*
- Eurasian teal *Anas crecca*
- Northern pintail *Anas acuta*
- Eurasian oystercatcher *Haematopus ostralegus*
- Ringed plover *Charadrius hiaticula*
- European golden plover *Pluvialis apricaria*
- Grey plover *Pluvialis squatarola*
- Red knot *Calidris canutus*
- Sanderling *Calidris alba*
- Dunlin *Calidris alpina alpina*
- Black-tailed godwit *Limosa limosa islandica*
- Bar-tailed godwit *Limosa lapponica*

¹⁴ <http://publications.naturalengland.org.uk/publication/4868920422957056> [Accessed on the 21/06/2021].

- Common redshank *Tringa totanus*

3.14 During the breeding season the SPA regularly supports:

- Ruff *Philomachus pugnax*
- Lesser black-backed gull *Larus fuscus*
- Common tern *Sterna hirundo*

Qualifying assemblage of species (Article 4.2)

3.15 During the non-breeding season, the SPA regularly supports an assemblage of waterfowl of more than 20,000 birds. Over winter, the site regularly supports 46,196 individual waterfowl (5 year peak mean 1991/2 – 1995/6) including: pochard *Aythya farina*, mallard *Anas platyrhynchos*, teal *Anas crecca*, wigeon *Anas penelope*, pintail *Anas acuta*, pink-footed goose *Anser brachyrhynchus*, whooper swan *Cygnus cygnus* and Bewick's swan *Cygnus columbianus bewickii*.

Ramsar Qualifying Features¹⁵

3.16 The site qualifies as a Ramsar site due to the following criteria:

Ramsar Criterion 2

This site supports up to 40% of the Great Britain population of natterjack toads *Bufo calamita*.

Ramsar Criterion 5 – Assemblages of international importance

Species with peak counts in winter: 222,038 waterfowl (5 year peak mean 1998/9 – 2002/3)

Ramsar Criterion 6 – Species / populations occurring at levels of international importance

Species regularly supported during the breeding season

- Lesser black-backed gull *Larus fuscus graellsii*; 4,108 apparently occupied nests, representing an average of 2.7% of the breeding population (Seabird 2000 Census)

Species with peak counts in spring / autumn

- Ringed plover *Charadrius hiaticula*; 3,761 individuals, representing an average of 5.1% of the population¹⁶ (5 year peak mean 1998/9 – 2002/3)
- Grey plover *Pluvialis squatarola*; 11,021 individuals, representing an average of 4.4% of the population (5 year peak mean 1998/9 – 2002/3)
- Red knot *Calidris canutus islandica*; 42,692 individuals, representing an average of 9.4% of the population (5 year peak mean 1998/9 – 2002/3)
- Sanderling *Calidris alba*; 7,401 individuals, representing an average of 6% of the population (5 year peak mean 1998/9 – 2002/3)
- Dunlin *Calidris alpina alpina*; 38,196 individuals, representing an average of 2.8% of the population (5 year peak mean 1998/9 – 2002/3)
- Black-tailed godwit *Limosa limosa islandica*; 3,323 individuals, representing an average of 9.4% of the population (5 year peak mean 1998/9 – 2002/3)
- Common redshank *Tringa totanus totanus*; 4,465 individuals, representing an average of 1.7% of the population (5 year peak mean 1998/9 – 2002/3)

¹⁵ <https://jncc.gov.uk/jncc-assets/RIS/UK11057.pdf> [Accessed on the 21/06/2021]

¹⁶ Population numbers presented here generally relate to the European population.

- Lesser black-backed gull *Larus fuscus graellsii*; 1,747 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9 – 2002/3)

Species with peak counts in winter

- Tundra swan *Cygnus columbianus bewickii*; 230 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9 – 2002/3)
- Whooper swan *Cygnus cygnus*; 211 individuals, representing an average of 1% of the population (5 year peak mean 1998/9 – 2002/3)
- Pink-footed goose *Anser brachyrhynchus*; 6,552 individuals, representing an average of 2.7% of the population (5 year peak mean 1998/9 – 2002/3)
- Common shelduck *Tadorna tadorna*; 2,944 individuals, representing an average of 3.7% of the GB population (5 year peak mean 1998/9 – 2002/3)
- Eurasian wigeon *Anas Penelope*; 69,841 individuals, representing an average of 4.6% of the population (5 year peak mean 1998/9 – 2002/3)
- Eurasian teal *Anas crecca*; 5,107 individuals, representing an average of 1.2% of the population (5 year peak mean 1998/9 – 2002/3)
- Northern pintail *Anas acuta*; 1,497 individuals, representing an average of 2.4% of the population (5 year peak mean 1998/9 – 2002/3)
- Eurasian oystercatcher *Haematopus ostralegus ostralegus*; 18,926 individuals, representing an average of 1.8% of the population (5 year peak mean 1998/9 – 2002/3)
- Bar-tailed godwit *Limosa lapponica lapponica*; 13,935 individuals, representing an average of 11.6% of the population (5 year peak mean 1998/9 – 2002/3)

SPA Conservation Objectives¹⁷

- 3.17 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.18 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

Threats & Pressures to Site Integrity¹⁸

- 3.19 The following threats and pressures to the site integrity of the Ribble & Alt Estuaries SPA have been identified in Natural England's Site Improvement Plan:
- Coastal squeeze
 - Air pollution: Risk of atmospheric nitrogen deposition
 - Inappropriate scrub control

¹⁷ <http://publications.naturalengland.org.uk/publication/4868920422957056> [Accessed on the 21/06/2021]

¹⁸ <http://publications.naturalengland.org.uk/publication/6274126599684096> [Accessed on the 21/06/2021]

- Invasive species
- Hydrological changes
- Public access / disturbance
- Inappropriate coastal management
- Fisheries: Commercial marine and estuarine
- Change to site conditions
- Shooting / scaring

3.20 The Supplementary Advice on the Conservation Objectives¹⁹ also highlights that the maintenance of safe passage between roosting or nesting habitats is essential to the integrity of the site. The document also states that most qualifying bird species prefer open areas without obstructions to enable early detection of predators and utilisation of preferential flightlines.

Mersey Narrows & North Wirral Foreshore SPA / Ramsar

Introduction

3.21 The Mersey Narrows and North Wirral Foreshore SPA / Ramsar comprises extensive intertidal mud- and sandflats, areas of rocky shores and saltmarsh. Much of the site is composed of intertidal sandflats and extensive stretches of sea defences (e.g. breakwaters, groynes and hard embankments). The Seaforth Nature Reserve is made up of saltwater lagoons, saltmarsh, sand- and mudflats, and a large freshwater lagoon.

3.22 The habitats of the SPA / Ramsar are submerged at high tide and exposed at low tide, providing an important feeding habitat for birds. Seaforth Nature Reserve primarily constitutes a high tide roost and breeding site for terns, and foraging habitats to little gulls. Birds are also known to roost outside the SPA boundary near Hightown and on nearby fields, with terns also nesting at Langton Docks and Birkenhead Docks. Birds from several count sectors outside the SPA may also utilise the SPA / Ramsar at certain tidal stages and should be taken into account in impact assessments.

SPA Qualifying Features²⁰

Qualifying individual species listed in Annex I of the Wild Birds Directive (Article 4.1):

3.23 During the non-breeding season the SPA regularly supports:

- Bar-tailed godwit *Limosa lapponica*
- Common tern *Sterna hirundo*
- Red knot *Calidris canutus*
- Little gull *Hydrocoloeus minutus*

3.24 During the breeding season the SPA regularly supports:

- Common tern *Sterna hirundo*

¹⁹ Available at:

<https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK9005103&SiteName=ribble&SiteNameDisplay=Ribble+and+Alt+Estuaries+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=20>
[Accessed on the 16/07/2021]

²⁰

<https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK9020287&SiteName=nar&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&HasCA=1&NumMarineSeasonality=5&SiteNameDisplay=Mersey%20Narrows%20and%20North%20Wirral%20Foreshore%20SPA#SiteInfo> [Accessed on the 21/06/2021]

Qualifying assemblage of species (Article 4.2)

- 3.25 During the non-breeding season the SPA regularly supports an assemblage of waterfowl of more than 20,000 birds. Over winter, the site regularly supports 32,366 individual waterfowl (5 year peak mean 2004/5 – 2008/9) such as bar-tailed godwit *Limosa lapponica*, red knot *Calidris canutus*, cormorant *Phalacrocorax carbo*, grey plover, sanderling, dunlin, redshank and oystercatcher.
- 3.26 Egremont foreshore is an important feeding habitat for waders at low tide. The North Wirral Foreshore supports large numbers of feeding waders at low tide and comprises important high tide roosts. Seaforth Nature Reserve is a popular roost site for birds feeding at the Egremont and North Wirral Foreshores.

Ramsar Qualifying Features²¹

3.27 The site qualifies as a Ramsar site due to the following criteria:

Ramsar Criterion 4

The site regularly supports plant and / or animal species at a critical stage in their life cycles, or provides refuge during adverse conditions.

During 2004/5 – 2008/9 the Mersey Narrows and North Wirral Foreshore Ramsar site supported important numbers of non-breeding little gulls and common terns.

Ramsar Criterion 5 – Assemblages of international importance

Species with peak counts in winter: 32,402 waterfowl (5 year peak mean 2004/5 – 2008/9))

Ramsar Criterion 6 – Species / populations occurring at levels of international importance

Species with peak counts in winter

- Bar-tailed godwit *Limosa lapponica*; 3,344 individuals, representing an average of 6.6% of the GB population (5 year peak mean 2004/5 – 2008/9)
- Little gull *Hydrocoloeus minutus*; 213 individuals (5 year peak mean 2004/5 – 2008/9)
- Common tern *Sterna hirundo*; 1,475 individuals (5 year peak mean 2004/5 – 2008/9)

SPA Conservation Objectives²²

- 3.28 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.29 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

²¹ <https://jncc.gov.uk/jncc-assets/RIS/UK11057.pdf> [Accessed on the 21/06/2021]

²² <http://publications.naturalengland.org.uk/publication/6521906232557568> [Accessed on the 21/06/2021]

Threats & Pressures to Site Integrity²³

3.30 The following threats and pressures to the site integrity of the Mersey Narrows and North Wirral Foreshore SPA have been identified in Natural England's Site Improvement Plan:

- Public access / disturbance
- Changes in species distributions
- Invasive species
- Climate change
- Coastal squeeze
- Inappropriate scrub control
- Water pollution
- Fisheries: Commercial marine and estuarine
- Inappropriate coastal management
- Overgrazing
- Direct impact from third party
- Marine litter
- Predation
- Planning permission: General
- Marine consents and permits
- Wildfire / arson
- Air pollution: Impact of atmospheric nitrogen deposition
- Transportation and service corridors
- Physical modification

3.31 The Supplementary Advice on the Conservation Objectives²⁴ also specifies that connectivity to supporting habitats (e.g. foraging or roosting sites) and uninterrupted flightlines are important to the integrity of the site.

Liverpool Bay SPA

Introduction

3.32 The Liverpool Bay SPA lies in the eastern part of the Irish Sea, bordering the coastlines of north-west England and north Wales. The site covers an area of approx. 2,528km² and runs as a broad arc from Morecambe Bay to the east coast of Anglesey. Its seabed contains a range of mobile sediments, most commonly sand and gravelly sand, and is subject to relatively weak tidal currents (below 2 m/sec). Together with the large tidal range, this facilitates deposition of sediments and the formation of mud / sand belts.

²³ <http://publications.naturalengland.org.uk/publication/6579320399069184> [Accessed on the 21/06/2021]

²⁴ Available at:

<https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK9020287&SiteName=nar&SiteNameDisplay=Mersey+Narrows+and+North+Wirral+Foreshore+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAAArea=&NumMarineSeasonality=5> [Accessed on the 16/07/2021]

3.33 Primarily the site encompasses marine habitats that support large aggregations of wintering red-throated diver and common scoter, as well as important foraging areas for breeding little tern (from the Dee Estuary SPA / Ramsar) and common tern (from the Mersey Narrows and North Wirral Foreshore SPA / Ramsar). The boundary of the SPA extends beyond 12 nautical miles from the English coastline and, therefore, partly lies in Welsh territorial waters.

Qualifying Features²⁵

Qualifying individual species listed in Annex I of the Wild Birds Directive (Article 4.1):

3.34 During the non-breeding season the SPA regularly supports:

- Red-throated diver *Gavia stellate*
- Common scoter *Melanitta nigra*
- Little gull *Hydrocoloeus minutus*

3.35 During the breeding season the SPA regularly supports:

- Little tern *Sternula albifrons*
- Common tern *Sterna hirundo*

Qualifying assemblage of species (Article 4.2)

3.36 During the non-breeding season the SPA regularly supports an assemblage of waterfowl of more than 20,000 birds. Over winter, the site regularly supports 69,687 individual waterfowl (5 year peak mean 2004/5 – 2010/1).

Conservation Objective²⁶

3.37 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

3.38 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Threats & Pressures to Site Integrity²⁷

3.39 The following threats and pressures to the site integrity of the Liverpool Bay SPA have been identified in Natural England's Site Improvement Plan:

- Fisheries: Commercial marine and estuarine
- Transportation and service corridors
- Fisheries: Recreational marine and estuarine
- Extraction: Non-living resources

²⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/566835/liverpool-bay-bae-lerpwl-spa-departmental-brief.pdf [Accessed on the 21/06/2021]

²⁶ <http://publications.naturalengland.org.uk/publication/5089733892898816> [Accessed on the 21/06/2021]

²⁷ <http://publications.naturalengland.org.uk/publication/5296526586806272> [Accessed on the 21/06/2021]

- Siltation
- Water pollution

Sefton Coast SAC

Introduction

- 3.40 The Sefton Coast SAC is a 4,591.59ha large coastal site comprising tidal rivers / estuaries / sandflats / mudflats (50%), coastal sand dunes / sand beaches (30%), heath / scrub (10%) and coniferous woodland (10%). The site represents the fourth largest sand dune system in Britain, stretching over 20km from Southport in the north to Crosby in the south. Much of the site is publicly accessible, including the Ainsdale Sand Dunes and Cabin Hill National Nature Reserves. Parts of the SAC are under ownership by the Wildlife Trust and National Trust. Its location in relation to the Merseyside conurbation means that there are high levels of recreational use in some parts of the site, particularly surrounding the major car parks.
- 3.41 The site displays rapid erosion and active shifting dunes. In areas of high sand deposition, the mobile dunes are dominated by marram *Ammophila arenaria*. In areas of lower sand deposition, dominating species include lyme grass *Leymus arenarius*, sea holly *Eryngium maritimum*, cat's ear *Hypochaeris radicata*, red fescue *Festuca rubra* and meadow grass *Poa humilis*. The transition of habitats from foredunes, to dune grassland and dune slack is frequently present. There are large areas of semi-fixed and fixed dunes with herbaceous vegetation (ranging from calcareous to acidic). Extensive dune slacks are dominated by creeping willow *Salix repens*, 43% of which are found at this site.
- 3.42 Notably, the pools in the hollows and slacks of the more fixed dunes are the habitat of a large population of great-crested newts *Triturus cristatus*. Furthermore, there is a large population of petalwort *Petalophyllum ralfsii*, which was first recorded on the Sefton Coast in 1861. The species is often found adjacent to footpaths, where light trampling disturbance reduces ground vegetation.
- 3.43 Recreational pressure, dog fouling and disturbance by dogs are well documented pressures along the Sefton Coast, having the potential to affect the qualifying features.

Qualifying Features²⁸

- 3.44 Annex I habitats that are a primary reason for selection of this site:
- Embryonic shifting dunes
 - Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")
 - Fixed coastal dunes with herbaceous vegetation ("grey dunes")
 - Dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*)
 - Humid dune slacks
- 3.45 Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:
- Atlantic decalcified fixed dunes (*Calluno-Ulicetea*)
- 3.46 Annex II species that are a primary reason for selection of this site:
- Petalwort *Petalophyllum ralfsii*
- 3.47 Annex II species present as a qualifying feature, but not a primary reason for site selection:
- Great-crested newt *Triturus cristatus*

²⁸ <https://sac.incc.gov.uk/site/UK0013076> [Accessed on the 21/06/2021]

Conservation Objectives²⁹

- 3.48 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 3.49 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats and habitats of qualifying species
 - The structure and function (including typical species) of qualifying natural habitats
 - The structure and function of the habitats of qualifying species
 - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
 - The populations of qualifying species, and,
 - The distribution of qualifying species within the site.

Threats & Pressures to Site Integrity³⁰

- 3.50 The following threats and pressures to the site integrity of the Sefton Coast SAC have been identified in Natural England's Site Improvement Plan:
- Coastal squeeze
 - Air pollution: Risk of atmospheric nitrogen deposition
 - Inappropriate scrub control
 - Invasive species
 - Hydrological changes
 - Public access / disturbance
 - Inappropriate coastal management
 - Fisheries: Commercial marine and estuarine
 - Change to site conditions
 - Shooting / scaring

Dee Estuary SAC

Introduction

- 3.51 The Dee Estuary SAC is a 15,805.27ha large site comprising tidal rivers / estuaries (81.8%), salt marsh / salt pastures (16.1%), coastal sand dunes / sand beaches (0.7%), shingle / sea cliffs (0.5%) and bogs / marshes (0.4%). The Dee Estuary is one of the largest estuaries in the UK and the most extensive coastal plain between the Severn Estuary and the Solway Firth. Historically, the estuary stretched as far inland as Chester, but its form has been heavily modified over the past 300 years. On the English side of the estuary the sandstone Hilbre Islands and Red Rocks form low uneven cliffs and intertidal rock platforms, comprising one of the very few examples of rocky shore between Little Orme and St. Bees Head.

²⁹ <http://publications.naturalengland.org.uk/publication/6588974160150528> [Accessed on the 21/06/2021]

³⁰ <http://publications.naturalengland.org.uk/publication/6274126599684096> [Accessed on the 21/06/2021]

- 3.52 The intertidal sections of the SAC are dominated by sandflats and mudflats, with the remainder largely constituting saltmarsh. These intertidal flats are the fifth largest such area within any UK estuary. At the mouth of the estuary, where water movement is greatest, the sediment mainly comprises sand and invertebrate populations are dominated by polychaete worms and amphipod crustaceans. The upper reaches largely constitute muddy sand, inhabited by ragworms *Hediste diversicolor* and Baltic tellins *Macoma balthica*. The intertidal mudflats of the sheltered inner estuary particularly support populations of marine worms, molluscs and other invertebrates of high abundance and biomass.
- 3.53 Finally, the Dee Estuary includes approx. 2,480ha of saltmarsh, constituting roughly 7% of all saltmarsh in the UK. It is one of the few UK examples that demonstrates a full transition from pioneer saltmarsh through to non-tidal vegetation. The elaborate creek system in the estuary provides a wider range of habitats compared to other estuaries. Large sections of the saltmarsh remain ungrazed, favouring species that are otherwise susceptible to grazing.

Qualifying Features³¹

- 3.54 Annex I habitats that are a primary reason for selection of this site:
- Mudflats and sandflats not covered by seawater at low tide
 - *Salicornia* and other annuals colonizing mud and sand
 - Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)
- 3.55 Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:
- Estuaries
 - Annual vegetation of drift lines
 - Vegetated sea cliffs of the Atlantic and Baltic Coasts
 - Embryonic shifting dunes
 - Shifting dunes along the shoreline with *Ammophila arenaria* (“white dunes”)
 - Fixed coastal dunes with herbaceous vegetation (“grey dunes”)
 - Humid dune slacks
- 3.56 Annex II species present as a qualifying feature, but not a primary reason for site selection:
- Sea lamprey *Petromyzon marinus*
 - River lamprey *Lampetra fluviatilis*
 - Petalwort *Petalophyllum ralfsii*

Conservation Objectives³²

- 3.57 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ listed below), and subject to natural change;
- 3.58 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats and habitats of qualifying species
 - The structure and function (including typical species) of qualifying natural habitats

³¹ <https://sac.jncc.gov.uk/site/UK0030131> [Accessed on the 21/06/2021]

³² <http://publications.naturalengland.org.uk/publication/6124489284780032> [Accessed on the 21/06/2021]

- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Threats & Pressures to Site Integrity³³

3.59 The following threats and pressures to the site integrity of the Dee Estuary SAC have been identified in Natural England's Site Improvement Plan:

- Public access / disturbance
- Changes in species distributions
- Invasive species
- Climate change
- Coastal squeeze
- Inappropriate scrub control
- Water pollution
- Fisheries: Commercial marine and estuarine
- Inappropriate coastal management
- Overgrazing
- Direct impact from third party
- Marine litter
- Predation
- Planning permission: General
- Marine consents and permits
- Wildfire / arson
- Air pollution: Impact of atmospheric nitrogen deposition
- Transportation and service corridors
- Physical modification

³³ <http://publications.naturalengland.org.uk/publication/6579320399069184> [Accessed on the 21/06/2021]

4. Impact Pathways

Impact Pathways Considered

4.1 The following impact pathways are considered relevant to the West Lancashire Local Plan:

- Recreational pressure
- Loss of functionally linked habitat
- Atmospheric pollution
- Water quality
- Water quantity, level and flow
- Visual and noise disturbance during construction
- Coastal squeeze
- Impacts of Tall Structures (collision mortality, disturbance displacement, impacts on flightlines)

Background to Recreational Pressure

4.2 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfill conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels and impacts on European protected sites^{34 35}. While many European sites are vulnerable to recreation, housing growth has particularly strong impacts in sites designated for their bird interest. HRAs of planning documents tend to focus on recreational sources of disturbance as a result of new residents³⁶.

4.3 Studies across a range of species have shown that the effects from recreation can be complex. Human activity can affect birds either directly (e.g. by eliciting flight responses) or indirectly (e.g. through damaging their habitat or reducing their fitness in less obvious ways). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes (e.g. an increase in heart rate). While these are less noticeable, they might result in major population-level changes by altering the balance between immigration / birth and emigration / death³⁷.

4.4 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding³⁸. Disturbance therefore risks increasing energetic expenditure of birds while reducing their energetic intake, which can adversely affect the 'condition' and ultimately survival of the birds. Additionally, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, which then must sustain a greater number of birds³⁹. Moreover, the higher proportion of time a breeding bird spends away from its

³⁴ Liley D, Clarke R.T., Mallord J.W., Bullock J.M. 2006a. The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Footprint Ecology report for Natural England.

³⁵ Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. 2006b. Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology report for Dorset County Council.

³⁶ The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

³⁷ Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. *Scottish Natural Heritage*.

³⁸ Riddington, R. *et al.* 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

³⁹ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

nest, the more likely it is that eggs will cool and the more vulnerable they, or any nestlings, are to predators. Recreational pressure effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as stone curlew and nightjar^{40 41}.

- 4.5 Several factors (e.g. seasonality, type of recreational activity) may have pronounced impacts on the nature of bird disturbance. Disturbance in winter can be more impactful because food shortages make birds more vulnerable at this time of the year. In contrast, there are often fewer recreational users in the winter months and disturbance impacts may be reduced because birds are not breeding. Furthermore, evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance compared to hiking⁴². Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers⁴³. Furthermore, differences in on-site route lengths and usage patterns likely imply that key spatial and temporal parameters (such as the area of a site potentially impacted and the frequency of disturbance) will also differ between recreational activities. This suggests that activity type is a factor that should be taken into account in HRAs.

Non-breeding birds (September to March)

- 4.6 The Borough of West Lancashire lies adjacent to the Liverpool City Metropolitan area and is adjoined in the north-west of the borough by the Ribble & Alt Estuaries SPA / Ramsar, most of which stretches along the coast separated by the borough by Sefton. The Mersey Narrows & North Wirral Foreshore SPA / Ramsar lies further to the south, adjoining Sefton. The Martin Mere SPA / Ramsar, owned and managed by the Wildfowl & Wetlands Trust, lies in central West Lancashire. These European sites are all designated for overwintering waterfowl and waders, which are sensitive to recreational pressure, and this section discusses academic research available on these groups of birds.
- 4.7 Evans & Warrington found that on Sundays total water bird numbers (including shoveler and gadwall) were 19% higher on Stocker's Lake LNR in Hertfordshire and attributed this to observed greater recreational activity on surrounding water bodies at weekends relative to weekdays displacing birds into the LNR. However, in this study, recreational activity was not quantified in detail, nor were individual recreational activities evaluated separately.
- 4.8 Tuite et al⁴⁴ used a large (379 sites), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They determined that the shoveler was one of the most sensitive species to water-based activities, such as sailing, windsurfing and rowing. Studies on recreation in the Solent have established that human leisure activities cause direct disturbance to wintering waterfowl populations⁴⁵⁴⁶.
- 4.9 A study on recreational disturbance in the Humber⁴⁷ assesses different types of noise disturbance on waterfowl referring to previous research relating to aircraft (see Drewitt 1999⁴⁸), traffic

⁴⁰ Clarke R.T., Liley D., Sharp J.M., Green R.E. 2013. Building development and roads: Implications for the distribution of stone curlews across the Brecks. *PLOS ONE*. doi:10.1371/journal.pone.

⁴¹ Liley D., Clarke R.T. 2003. The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* **114**: 219-230.

⁴² Banks P.B., Bryant J.Y. 2007. Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* **3**: 14pp.

⁴³ Miller S.G., Knight R.L., Miller C.K. 2001. Wildlife responses to pedestrians and dogs. 29: 124-132.

⁴⁴ Tuite, C.H., Hanson, P.R. & Owen, M. 1984. Some ecological factors affecting winter wildfowl distribution on inland waters in England and Wales and the influence of water-based recreation. *Journal of Applied Ecology* **21**: 41-62

⁴⁵ Footprint Ecology. 2010. Recreational Disturbance to Birds on the Humber Estuary.

⁴⁶ Footprint Ecology, Jonathan Cox Associates & Bournemouth University. 2010. Solent Disturbance and Mitigation Project – various reports.

⁴⁷ Fearnley H., Liley D. & Cruickshanks K. (2012) Results of Recreational Visitor Survey across the Humber Estuary. Footprint Ecology.

⁴⁸ Drewitt, A. (1999) Disturbance effects of aircraft on birds. *English Nature Reports*, Peterborough.

(Reijnen, Foppen, & Veenbaas 1997⁴⁹), dogs (Lord, Waas, & Innes 1997⁵⁰; Banks & Bryant 2007⁵¹) and machinery (Delaney et al. 1999; Tempel & Gutierrez 2003). It identifies that there is still relatively little work on the effects of different types of water-based craft and the impacts from jet skis, kite surfers, windsurfers etc (see Kirby et al. 2004 for a review⁵²). In general terms, both distance from the source of disturbance and the scale of the disturbance (noise level, group size) is likely to influence bird responses (Delaney et al. 1999⁵³; Beale & Monaghan 2005⁵⁴). On UK estuaries and coastal sites, a review of WeBS data showed that among the volunteer WeBS surveyors, driving of motor vehicles and shooting were the two activities most perceived to cause disturbance (Robinson & Pollitt 2002⁵⁵).

- 4.10 Generally, disturbing activities present themselves on a continuum. Activities that involve irregular, infrequent and loud noise events, movement or vibration are likely to be most disturbing. For example, the presence of dogs around water bodies generate substantial disturbance due to the type of habitats accessed (e.g. intertidal mudflats and saltmarsh), the area affected and dogs' impacts on bird behaviour. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable and quiet patterns of sound, movement or vibration. The further any activity is from the birds, the less likely it is to result in disturbance. Overall, the factors that determine species responses to disturbance include species sensitivity, timing/duration of the recreational activity and the distance between source and receptor of disturbance.
- 4.11 As part of the Bird Aware Project in the Solent, a study monitoring bird disturbance across 20 different locations was undertaken between December 2009 and February 2010⁵⁶. This involved recording all recreational activities and relating these to behavioural responses of birds in pre-defined focal areas of intertidal habitat. The study recorded a total of 2,507 potential disturbance events, generating 4,064 species-specific behaviours. Roughly 20% of recorded events resulted in disturbance to waterfowl, including behaviours such as becoming alert, walking / swimming away, short flights (< 50m) or major flights. Generally, the likelihood of disturbance decreased with increasing distance to the disturbance stimulus (i.e. the recreational activity being undertaken). Importantly, the study also illustrated that recreational activities in the intertidal zone have the highest disturbance potential (41% of recorded events resulted in disturbance), followed by water-based activities (25%) and shore-based activities (12%).
- 4.12 The specific distance at which a species takes flight when disturbed is known as the 'tolerance distance' (also called the 'escape distance') and greatly differs between species. The tolerance distances of the study carried out for the Bird Aware project are summarised in Table 1. It is reasonable to assume from this evidence that disturbance is unlikely to be relevant at distances of beyond 300m. The data show that disturbance sensitivity differs between species, but that intra-specific variation is equally important. It was also examined how disturbance to different recreational activities varies between species, but for most species the number of recorded events was insufficient for comparison (except for brent goose, oystercatcher and redshank). Again, there may be inter-specific differences in responses to different types of recreation. For example, brent geese responded to dog walkers much further away than oystercatchers and redshanks.

⁴⁹ Reijnen, R., Foppen, R. & Veenbaas, G. (1997) Disturbance by traffic of breeding birds: evaluation of the effect and considerations in planning and managing road corridors. *Biodiversity and Conservation* **6**: 567-581.

⁵⁰ Lord, A., Waas, J.R. & Innes, J. (1997) Effects of human activity on the behaviour of northern New Zealand dotterel *Charadrius obscurus aquilonius* chicks. *Biological Conservation* **82**:15-20.

⁵¹ Banks, P.B. & Bryant, J.V. (2007) Four-legged friend of foe? Dog-walking displaces native birds from natural areas. *Biological Letters* **3**: 611-613.

⁵² Kirby, J.S., Clee, C. & Seager, V. (1993) Impact and extent of recreational disturbance to wader roosts on the Dee estuary: some preliminary results. *Wader Study Group Bulletin* **68**: 53-58.

⁵³ Delaney, D.K., Grubb, T.G., Beier, P., Pater, L.L.M. & Reiser, H. (1999) Effects of Helicopter Noise on Mexican Spotted Owls. *The Journal of Wildlife Management* **63**: 60-76.

⁵⁴ Beale, C.M. & Monaghan, P. (2005) Modeling the Effects of Limiting the Number of Visitors on Failure Rates of Seabird Nests. *Conservation Biology* **19**: 2015-2019.

⁵⁵ Robinson, J.A. & Pollitt, M.S. (2002) Sources and extent of human disturbance to waterbirds in the UK: an analysis of Wetland Bird Survey data, 1995/96 to 1998/99: Less than 32% of counters record disturbance at their site, with differences in causes between coastal and inland sites. *Bird Study* **49**: 205.

⁵⁶ Liley D., Stillman R. & Fearnley H. 2011. The Solent Disturbance and Mitigation Project Phase 2: Results of Bird Disturbance Fieldwork 2009/10. Report by Footprint Ecology for the Solent Forum.

Table 1: Tolerance distances in metres of 16 species of waterfowl to various forms of recreational disturbance, as found in recent disturbance fieldwork⁵⁷. The distances are provided both as a median and a range.

Species	Disturbance (metres from Activity stimulus)		Activity			
	Median	Range	Cycling	Dog walking	Jogging	Walking
Brent goose	51.5	5 - 178	100	95	30	50
Oystercatcher	46	10 - 200	150	45		50
Redshank	44.5	75 - 150	125	50	40	58
Curlew	75	25 - 200				
Turnstone	50	5 - 100				
Coot	12	10 - 20				
Mute swan	12	8 - 50				
Grey plover	75	30 - 125				
Little egret	75	30 - 200				
Wigeon	75.5	20 - 125				
Dunlin	75	25 - 300				
Shelduck	77.5	50 - 140				
Great-crested grebe	100	50 - 100				
Lapwing	75	18 - 125				
Teal	60	35 - 200				
Mallard	25	10 - 50				

4.13 The north-west coastline comprises several Sites of Special Scientific Interest (SSSIs) and Special Protection Areas (SPAs) and stretches over 1,400km. The sites that are most relevant to West Lancashire include the Ribble & Alt Estuaries SPA / Ramsar, the Mersey Narrows and North Wirral Foreshore SPA / Ramsar and the Martin Mere SPA / Ramsar (the latter representing an inland freshwater site). All sites are designated for overwintering bird species that are sensitive to recreational disturbance. A recent study of these SPAs / Ramsars ranked all sites according to their vulnerability to recreation, finding that the Mersey Narrows & North Wirral Foreshore SPA / Ramsar is the most sensitive⁵⁸. This was attributed to a number of factors, including easy access onto the foreshore, a high proportion of sand in the sediment (encouraging access) and a large number of high-capacity car parks. Dog walking has been highlighted as a significant issue in many of the north-western SPAs / Ramsars, leading to vigilance behaviours and displacement of wildfowl and waders.

4.14 In response to the growing issue of recreation along the north-western coast (particularly when considering future housing growth in the wider Liverpool area), Natural England commissioned bird disturbance assessments and visitor surveys in selected sites of conservation importance. These studies were to focus on the most sensitive locations, survey multiple access locations and yield standardised data. The data from the surveys, which was collected by Footprint Ecology in the winter of 2016/17⁵⁹, is relevant to West Lancashire and will be consulted in this Screening Report.

⁵⁷ Ibid.

⁵⁸ Ross K., Liley D., Austin G., Burton N., Stillman R., Cruickshanks K. & Underhill-Day J. (2014). Housing development and estuaries in England: Developing methodologies for assessing the impacts of disturbance to non-breeding waterfowl. Unpublished report for Natural England. 164pp.

⁵⁹ Liley D., Panter C., Marsh P. & Roberts J. (2017). Recreational activity and interactions with birds within the SSSIs on the North-West coast of England.

Breeding Birds (April to September)

- 4.15 In addition to their overwintering bird assemblages, the Ribble & Alt Estuaries SPA / Ramsar (ruff, lesser black-backed gull and common tern), Mersey Narrows & North Wirral Foreshore SPA / Ramsar (common tern) and Liverpool Bay SPA (little tern and common tern), are also designated for breeding birds. These species breed in the summer months, meaning that the recreational pressure impact pathway in the north-western SPAs / Ramsars is not limited to the overwintering period. Terns in particular are sensitive to recreational users (especially from off-lead dogs), because they are ground-nesting species that form their nest as a shallow scrape on bare ground. This makes them very susceptible to egg predation, trampling damage, egg theft and vandalism. Disturbance from dog walkers is a particular threat to ground-nesting birds, which tend to have lower disturbance tolerances because their nests are at higher risk from predators⁶⁰.
- 4.16 Disturbance to birds during the pre-incubation, incubation and chick provisioning stages may lead to the abandonment of potential nesting sites, eggs or chicks, resulting in failure to reproduce or in reduced calorific intake by chicks. If disturbance is pervasive, the failure to produce viable offspring may result in reduced fitness at the population level. This is supported in the literature. For example, a study assessing the breeding success of little tern and least tern found that nest success was significantly higher (82%) in artificial habitats than on natural sandy beaches (58%)⁶¹. This was primarily due to recreational disturbance on the beaches (which was absent in artificial habitats). Furthermore, even in successful nests, the number of unhatched eggs was twice as high in the natural habitat, most likely due to disturbance leading to the cooling of eggs.
- 4.17 Many qualifying bird species breed in colonies and the likelihood of disturbance to breeding birds depends on the accessibility of the wider nesting areas to the public. For example, in the Ribble & Alt Estuaries SPA / Ramsar, common terns breed within the Ribble Estuary National Nature Reserve and on sandy foreshores in the Alt Estuary. Lesser black-backed gulls have two known main breeding areas at Banks and Hesketh Marshes, which are both managed by the RSPB. In contrast, the breeding locations of ruff are unknown, but it is thought that this species preferentially breeds in lowland hay meadows subject to grazing regimes, particularly in the Ribble Estuary.
- 4.18 Both common and little terns forage within the shallow coastal waters of the Liverpool Bay SPA amidst recreational boats, ships and personal watercraft. The Liverpool Bay was designated as an SPA due to its essential function in supporting foraging seabirds. A significant increase in water-based recreation (jet-skiing, sailing, kayaking) has the potential to affect the ability of the site to fulfil this supporting role.

Trampling Damage, Nutrient Enrichment and Wildfires

- 4.19 Most terrestrial habitats (especially dune systems, heathland and woodland) can be affected by trampling and other mechanical damage, which in turn dislodges individual plants, leads to soil compaction and erosion. This is relevant to the Sefton Coast SAC which is coincident with the Ribble & Alt Estuaries SPA / Ramsar in Sefton. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:
- Wilson & Seney⁶² examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.

⁶⁰ For a review of disturbance in relation to terns see: Liley D. (2008). Little terns at Great Yarmouth. Disturbance to birds and implications for strategic planning and development control. Unpublished report by Footprint Ecology for Great Yarmouth Borough Council and the RSPB. 14pp

⁶¹ Pakanen V-M., Hongell H., Aikio S. & Koivula K. (2014). Little tern breeding success in artificial and natural habitats: Modelling population growth under uncertain vital rates. *Population Ecology* **56**: 581-591.

⁶² Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* **14**:77-88

- Cole et al⁶³ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
 - Cole ⁶⁴ conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no difference in the effect on cover.
 - Cole & Spildie⁶⁵ experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.
- 4.20 Sand dunes are dynamic systems that are shaped by factors such as the supply of sand and prevailing wind direction. 80% of dunes in the UK are currently subject to coastal erosion, diminishing the dune itself and creating bare ground. Natural England's Access and Nature Conservation Reconciliation guidance note states that light levels of trampling can increase plant diversity, but medium to high levels of trampling promote bare ground, increase soil compaction, reduce plant diversity and change vegetation height. The type of dune habitat also influences its response to recreational pressure. For example, in fixed decalcified dunes the relationship between levels of access and impact is linear (i.e. proportionate relationship). In other dune types (e.g. embryonic shifting dunes), the relationship is curvilinear, suggesting that a small increase in trampling has a disproportionately strong effect, with a flattening of the impact curve at higher trampling damage⁶⁶.
- 4.21 A major concern for nutrient-poor terrestrial habitats such as dune systems is nutrient enrichment associated with dog fouling, which has been addressed in various reviews (e.g.⁶⁷). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a spread-out distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually⁶⁸. While there is little information on the chemical

⁶³ Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* **32**: 203-214

Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* **32**: 215-224

⁶⁴ Cole, D.N. 1995c. Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

⁶⁵ Cole, D.N., Spildie, D.R. 1998. Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* **53**: 61-71

⁶⁶ Coombes E.G. (2007). The effects of climate change on coastal recreation and biodiversity. School of Environmental Sciences. University of East Anglia, Norwich.

⁶⁷ Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. 2005. Dogs, access and nature conservation. English Nature Research Report, Peterborough.

⁶⁸ Barnard A. 2003. Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* **11**:16-19.

constituents of dog faeces, nitrogen is one of the main components⁶⁹. Nutrient levels are the major determinant of plant community composition and the effect of dog defecation in sensitive habitats is comparable to a high-level application of fertiliser, potentially resulting in the shift to plant communities that are more typical of improved grasslands.

Typical Mitigation Measures

4.22 Mitigation measures to avoid recreational pressure effects usually involve a combination of access and habitat management, and the provision of alternative recreational space. Typically, Local Authorities (in their role as Competent Authorities) can set out frameworks for improved habitat and access management, in collaboration with other adjoining Local Planning Authorities. Provision of alternative recreational space can help to attract recreational users away from sensitive European sites and reduce pressure on the sites. However, the location and habitat type of such alternative destinations must be carefully selected to be effective.

Conclusion

4.23 The available baseline information suggests that the following European sites within 15km of West Lancashire are sensitive to recreational pressure due to the presence of waterfowl, waders and seabirds at different times throughout the year (**the sites in bold are taken forward into the following chapters**):

- **Martin Mere SPA / Ramsar (located centrally in West Lancashire)**
- **Ribble & Alt Estuaries SPA / Ramsar (located in the northern part of West Lancashire)**
- **Mersey Narrows & North Wirral Foreshore SPA / Ramsar (at its closest point lies approx. 8.9km to the south-west of West Lancashire)**
- **Sefton Coast SAC (at its closest point lies approx. 431m to the west of West Lancashire)**
- **Dee Estuary SAC (at its closest point lies approx. 9km to the south-west of West Lancashire)**
- Liverpool Bay SPA (at its closest point lies approx. 3.6km to the west of West Lancashire)

4.24 The Liverpool Bay SPA, partly designated for disturbance-sensitive red-throated diver and common scoter, lies some distance offshore from Sefton, with its landward boundary at the line of Mean Low Water. Regarding coastal recreation, these birds are likely to be most affected by water-based activities, such as sailing, kayaking or jet skiing. However, it is considered that only a small fraction of visitors from West Lancashire would engage in these activities. Therefore, the Liverpool Bay SPA is not considered further in relation to this impact pathway.

Background to Atmospheric Pollution

Table 2: Main sources and effects of air pollutants on habitats and species⁷⁰

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO ₂)	<p>The main sources of SO₂ are electricity generation, and industrial and domestic fuel combustion. However, total SO₂ emissions in the UK have decreased substantially since the 1980's.</p> <p>Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO₂ have been documented in busy ports. In future years shipping is</p>	<p>Wet and dry deposition of SO₂ acidifies soils and freshwater, and may alter the composition of plant and animal communities.</p> <p>The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species.</p>

⁶⁹ Taylor K., Anderson P., Liley D. & Underhill-Day J.C. 2006. Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

⁷⁰ Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>)

Pollutant	Source	Effects on habitats and species
	likely to become one of the most important contributors to SO ₂ emissions in the UK.	However, SO ₂ background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.
Acid deposition	<p>Leads to acidification of soils and freshwater via atmospheric deposition of SO₂, NO_x, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.</p> <p>Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, increased N emissions may cancel out any gains produced by reduced S levels.</p>	<p>Gaseous precursors (e.g. SO₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition.</p> <p>Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants.</p> <p>Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.</p>
Ammonia (NH ₃)	<p>Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock.</p> <p>Ammonia reacts with acid pollutants such as the products of SO₂ and NO_x emissions to produce fine ammonium (NH₄⁺) - containing aerosol. Due to its significantly longer lifetime, NH₄⁺ may be transferred much longer distances (and can therefore be a significant trans-boundary issue).</p> <p>While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.</p>	<p>The negative effect of NH₄⁺ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation.</p> <p>Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen.</p> <p>As emissions mostly occur at ground level in the rural environment and NH₃ is rapidly deposited, some of the most acute problems of NH₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.</p>
Nitrogen oxides (NO _x)	<p>Nitrogen oxides are mostly produced in combustion processes. Half of NO_x emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes.</p> <p>In contrast to the steep decline in Sulphur dioxide emissions, nitrogen oxides are falling slowly due to control strategies being offset by increasing numbers of vehicles.</p>	<p>Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NO_x for all vegetation types has been set to 30 ug/m³.</p> <p>Deposition of nitrogen compounds (nitrates (NO₃), nitrogen dioxide (NO₂) and nitric acid (HNO₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification.</p> <p>In addition, NO_x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.</p>
Nitrogen deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO _x) or reduced (e.g. NH ₃) nitrogen emissions (described separately above). While oxidized nitrogen mainly	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally.

Pollutant	Source	Effects on habitats and species
	<p>originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices.</p> <p>The N pollutants together are a large contributor to acidification (see above).</p>	<p>Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species.</p> <p>N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.</p>
Ozone (O ₃)	<p>A secondary pollutant generated by photochemical reactions involving NO_x, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above).</p> <p>Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.</p>	<p>Concentrations of O₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings.</p> <p>High O₃ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.</p>

4.25 The main pollutants of concern for European sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂) and are summarised in Table 2. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges⁷¹. NO_x can also be toxic at high concentrations (far above the annual average critical level). High levels of NO_x and NH₃ are likely to increase the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere can, if sufficiently great, enhance soil fertility and lead to eutrophication. This often has adverse effects on community composition and the quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats^{72 73}.

4.26 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping⁷⁴. Ammonia emissions primarily originate from agricultural practices⁷⁵, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO₂ or NH₃ emissions will be associated with the West Lancashire Local Plan. NO_x emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion to its overall NO_x footprint (92%) through the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁷⁶. Emissions of NO_x could therefore be reasonably expected to increase as a result of the additional commuter traffic associated with the West Lancashire Local Plan.

4.27 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 µgm⁻³; the threshold for sulphur dioxide is 20 µgm⁻³. In addition,

⁷¹ http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.

⁷² Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. 2006. Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* 38: 161-176

⁷³ Dijk, N. 2011. Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation *Global Change Biology* 17: 3589-3607

⁷⁴ http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.

⁷⁵ Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. 1998. A new inventory for ammonia emissions from U.K. agriculture. *Atmospheric Environment* 32: 309-313

⁷⁶ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

ecological studies have determined 'critical loads'⁷⁷ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃).

- 4.28 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant⁷⁸. Therefore, this distance has been used throughout this HRA in order to determine whether European sites are likely to be significantly affected by development outlined in the Local Plan.

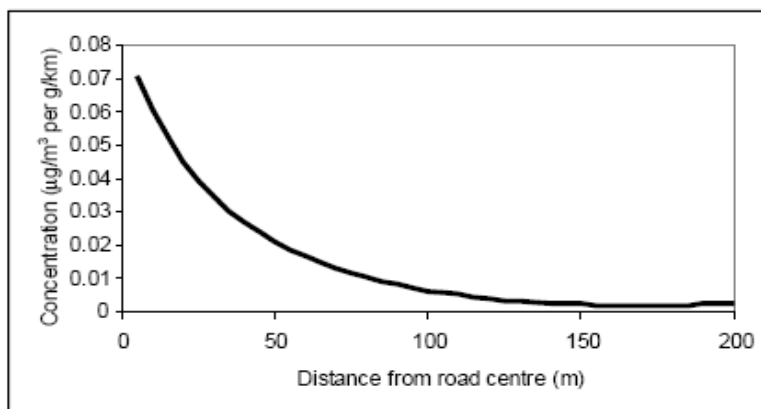


Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT⁷⁹)

- 4.29 Atmospheric nitrogen deposition from vehicle exhaust emissions has the potential to affect a variety of habitats, particularly nutrient-poor habitats such as dune systems. Both the Sefton Coast SAC and the Dee Estuary SAC lie within 15km of West Lancashire and are designated for dune features (the most sensitive of which are fixed coastal dunes with herbaceous vegetation). Furthermore, breeding terns (qualifying species of the Ribble & Alt Estuaries SPA / Ramsar and the Mersey Narrows & North Wirral Foreshore SPA / Ramsar) rely on bare ground to build their scrapes. A significant increase in nitrogen deposition has the potential to increase the abundance of graminoids, obstructing the ability of terns to successfully breed. An increase in the population and employment sector in the Borough of West Lancashire could result in increased commuter traffic flowing past these sites, depending on their locations in relation to major roads and other authorities.

- 4.30 The following European sites within 15km of West Lancashire are sensitive to atmospheric pollution (sites in bold are taken forward into the following chapters):

- **Ribble & Alt Estuaries SPA / Ramsar (located in the northern part of West Lancashire)**
- **Mersey Narrows & North Wirral Foreshore SPA / Ramsar (at its closest point lies approx. 8.9km to the south-west of West Lancashire)**
- **Sefton Coast SAC (at its closest point lies approx. 431m to the west of West Lancashire)**
- **Dee Estuary SAC (at its closest point lies approx. 9km to the south-west of West Lancashire)**
- Martin Mere SPA / Ramsar (located centrally in West Lancashire)
- Liverpool Bay SPA / Ramsar

- 4.31 The Martin Mere SPA / Ramsar is a freshwater site that is primarily phosphate- rather than nitrogen-limited, meaning that phosphate is the primary fuel for plant growth. Agricultural land is important for the bird populations but has no critical load and is generally high in nitrogen and

⁷⁷ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

⁷⁸ <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013>; accessed 12/05/2016

⁷⁹ <http://www.dft.gov.uk/ha/standards/dmr/vol11/section3/ha20707.pdf>; accessed 13/07/2018

phosphorus. Phosphate does not derive from vehicle exhaust emissions and as such the SPA / Ramsar is excluded from further assessment. APIS highlights that none of the habitats of its qualifying species within this site are sensitive to atmospheric nitrogen deposition (saltmarsh is the only habitat associated with the species present in the SPA in which nitrogen deposition could result in effects on the bird population, but there is no saltmarsh within the SPA / Ramsar).

- 4.32 Being a marine site, the Liverpool Bay SPA / Ramsar, while potentially sensitive to atmospheric nitrogen deposition, lies far away from any major road. Therefore, it is not considered further in relation to this impact pathway.

Background to Loss of Functionally Linked Habitat

- 4.33 While most European sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not necessarily the case. A diverse array of qualifying species including birds, bats and amphibians are not always confined to the boundary of designated sites.
- 4.34 For example, the highly mobile nature of both wader and waterfowl species implies that areas of habitat of crucial importance to the integrity of their populations lie outside the physical limits of European sites. Despite not being part of the formal designation, these habitats are integral to the maintenance of the structure and function of the designated site, for example by encompassing important foraging grounds. Therefore, land use plans that may affect such functionally linked habitat require further assessment.
- 4.35 There is now an abundance of authoritative examples of HRA cases on plans affecting bird populations, where Natural England recognised the potential importance of functionally linked land⁸⁰. For example, bird surveys in relation to a previous HRA established that approximately 25% of the golden plover population in the Somerset Levels and Moors SPA would have been potentially affected by development while on functionally linked habitat, and this required the inclusion of mitigation measures in the relevant plan policy wording. Another important case study originates from the Mersey Estuary SPA / Ramsar, where adjacently located functionally linked land had a peak survey count of 108% of the 5 year mean peak population of golden plover. This finding led to considerable amendments in the planning proposal to ensure that the site integrity was not adversely affected.
- 4.36 Generally, the identification of an area as functionally linked habitat is not always a straightforward process. The importance of non-designated land parcels may not be apparent and thus might require the analysis of existing data sources (e.g. Bird Atlases or data from records centres) to be firmly established. In many instances (with the Solent Waders and Brent Goose Strategy being a notable exception), data may not be available at all, requiring further survey work.
- 4.37 West Lancashire lies in the vicinity of one inland freshwater European site (Martin Mere SPA / Ramsar) and several coastal / estuarine European sites that are designated for mobile waterfowl and waders. Therefore, it is possible that the allocation of greenfield sites (i.e. parcels of land without any existing development) would result in the loss of functionally linked habitat. The primary concern would be the loss of greenfield sites in the more rural western part of West Lancashire, which mostly constitutes agricultural land. Many SPA / Ramsar birds (particularly golden plover, geese and swans) forage in agricultural stubble in winter. Notably, the Ribble & Alt Estuaries SPA / Ramsar, the site that lies closest to West Lancashire, is designated for pink-footed geese, which are known to travel long distances to foraging patches in agricultural fields.
- 4.38 The Appropriate Assessment of the withdrawn West Lancashire Preferred Options document sourced bird survey data from the Lancashire Environment Record Network (LERN) and the Lancashire and Cheshire Fauna Society (LCFS). Data from LERN provided 193 records of SPA / Ramsar species across West Lancashire Borough, of which only 35 records were obtained post-2005 and in turn only 14 related to overwintering birds. For example, the HRA evaluated that three records of pink-footed goose (over 1% of the SPA / Ramsar population) were present in the

⁸⁰ Chapman C & Tyldesley D. 2016. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects – A review of authoritative decisions. *Natural England Commissioned Reports 207*. 73pp

tetrads of proposed garden villages to the west of Skelmersdale. Overall, the West Lancashire development options clearly have the potential to affect functionally linked habitat use of SPA / Ramsar birds. Given that previous data searches were undertaken with regard to different site allocations, a new bird data search will need to be carried out for the Reg. 19 HRA.

- 4.39 It is to be noted that only two of the north-western coastal / estuarine SPAs / Ramsars are included here, with the Mersey Estuary SPA / Ramsar and the Dee Estuary SPA / Ramsar lying beyond the 15km impact zone typically considered in HRAs⁸¹. Both these sites are also designated for mobile bird species. It is well established that there is likely to be movement of qualifying birds between all SPAs / Ramsars along the north-western coastline. Therefore, an assessment of LSEs and potential adverse effects (including mitigation) will also ensure that the integrity of the European sites in the wider coastal network is protected.
- 4.40 The Sefton Coast SAC is partly designated for great-crested newts, a species that requires different habitat types in its life cycle. Individuals that breed in ponds in the SAC's dune systems are likely to travel beyond the site boundary to forage or over-winter in terrestrial habitats. During the breeding season, their breeding ponds are of primary importance. Conversely, in winter, good-quality terrestrial habitat up to 250m away from the ponds (and potentially beyond the site boundary) is of high value to newts. A wide range of semi-natural habitats might be used for shelter, dispersal and foraging, including meadows, tussocky grassland, scrub, woodland, low-intensity farmland and brownfield sites. Newt dispersal in the terrestrial environment is highly dependent on habitat connectivity and habitat fragmentation must therefore be avoided. Similarly, the natterjack toad population of the Ribble & Alt Estuaries Ramsar is known to make use of sand dune habitat beyond the SAC boundary, such as the golf courses around Sefton.
- 4.41 Overall, the available baseline information suggests that the following European sites are sensitive to the loss of functionally linked habitats due to the presence of mobile waterfowl, waders, great-crested newts or natterjack toad (**the sites in bold are taken forward into the following chapters**):
- **Martin Mere SPA / Ramsar (located centrally in West Lancashire)**
 - **Ribble & Alt Estuaries SPA / Ramsar (located in the northern part of West Lancashire)**
 - **Mersey Narrows & North Wirral Foreshore SPA / Ramsar (at its closest point lies approx. 8.9km to the south-west of West Lancashire)**
 - **Sefton Coast SAC (at its closest point lies approx. 431m to the west of West Lancashire)**

Background to Water Quality

- 4.42 The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:
- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.
 - Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment,

⁸¹ The Natural England document 'Impact Risk Zones Guidance Summary Sites of Special Scientific Interest Notified for Birds Version 1.1' (dated March 2019) identifies that for SSSIs designated for wintering waterfowl and waders other than golden plover and lapwing) a maximum of 2km is appropriate for the identification of potential functionally-linked land for development with the exception of wind energy (3km) and airports (10km). For golden plover a zone of up to 10km is identified as being significant. Pink-footed goose can travel up to 15km from their roosting sites to feed.

nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen.

- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

4.43 The most notable issue in relation to the West Lancashire Local Plan is the discharge of treated sewage effluent, which is likely to increase the concentration of nutrients in European sites that are dependent on the input of water of sufficient quality. In marine and estuarine European sites (e.g. the Ribble & Alt Estuaries SPA / Ramsar, Mersey Narrows & North Wirral Foreshore SPA / Ramsar, Liverpool Bay SPA and Dee Estuary SAC) nitrogen is the main limiting nutrient and an increase in the volume of treated sewage effluent may lead to eutrophication. Given that West Lancashire (and the WwTWs serving it) lies in the vicinity of several marine / estuarine sites, WwTWs discharge requires further assessment. The Martin Mere SPA / Ramsar, located centrally in West Lancashire, encompasses a large freshwater body and is phosphate limited. While the Site Improvement Plan for this site does not highlight point-source pollution from WwTWs as a threat / pressure to site integrity, potential water quality impacts on the site will also require consideration.

4.44 Depending on the location of development sites in the emerging Plan, impacts of surface water runoff from hardstanding on water quality will also require consideration. Water from overflowing sewage systems and from industrial leakages and / or spillages may contribute nutrients or industrial pollutants to these sites.

4.45 West Lancashire lies in the sewage catchment served by United Utilities, responsible for the public water supply and wastewater treatment in this part of north-west England. The potential HRA implications of treated sewage discharge for European sites associated with residential and industrial development allocated in the West Lancashire Local Plan are outlined in Table 3.

Table 3: Wastewater Treatment Works⁸² serving West Lancashire Borough, the potential growth accommodated and its HRA implications.

WwTW Catchment	Development allocated in the West Lancashire Local Plan	HRA implications
Wigan (Hoscar), Skelmersdale, Burscough, Mere Brow, Hesketh, Southport, Holmes Wood, Halsall, Haskayne, Dark Lane, Hill House, Barrow Nook, Bispham, Tarlescough and Croston WwTWs (operated by United Utilities)	Not available at this point, but development will likely focus on the three settlements of Skelmersdale, Ormskirk and Burscough	Discharge of treated sewage effluent and industrial pollutants into local freshwater bodies, ultimately draining into the identified European sites

4.46 The following European sites within 15km of West Lancashire are sensitive to a deterioration in water quality (**sites in bold are taken forward into the following chapters**):

- **Martin Mere SPA / Ramsar (located centrally in West Lancashire)**
- **Ribble & Alt Estuaries SPA / Ramsar (located in the northern part of West Lancashire)**

⁸² Note that this is not an exhaustive list of the major WwTWs in West Lancashire. This list will be updated when the quantum and distribution of growth is identified, and serving WwTWs have been confirmed.

- **Mersey Narrows & North Wirral Foreshore SPA / Ramsar (at its closest point lies approx. 8.9km to the south-west of West Lancashire)**
- **Sefton Coast SAC (at its closest point lies approx. 431m to the west of West Lancashire)**
- **Dee Estuary SAC (at its closest point lies approx. 9km to the south-west of West Lancashire)**
- **Liverpool Bay SPA (at its closest point lies approx. 3.6km to the west of West Lancashire)**

Background to Water Quantity, Level and Flow

4.47 The water level, its flow rates and the mixing conditions are important determinants of the condition of European sites and their qualifying features. Hydrological processes are critical in influencing habitat characteristics in wetlands and coastal waters, including current velocity, water depth, dissolved oxygen levels, salinity and water temperature. In turn these parameters determine the short- and long-term viability of plant and animal species, as well as overall ecosystem composition. Changes to the water flow rate within an estuary can be associated with a multitude of further impact pathways, including substratum loss, smothering and changes in wave exposure, and often interact with coastal squeeze.

4.48 Coastal habitats rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant supply of freshwater is fundamental to maintaining the ecological integrity of coastal marine areas. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range of qualifying birds, invertebrate or plant species. In extreme cases, this might lead to the loss of the structure and functioning of marine ecosystems. There are two mechanisms through which urban development might negatively affect freshwater supply to European Sites:

- The supply of new housing with potable water will require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may decrease freshwater input to European sites sharing the same catchment.
- The proliferation of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. This can contribute to so-called flash floods and increased water flow into European sites. Some of the knock-on impacts of surface water runoff include increases in sedimentation, turbidity and anthropogenic pollutants.

4.49 Water abstraction for the potable water supply is of particular concern in areas with little rainfall (and limited recharge potential) or where water resources are already depleted. In 2013 the Environment Agency published a map of water-stressed areas, highlighting that both West Lancashire Borough and the wider north-west of England are identified as areas of low water stress (see Figure 4 below). While this part of England is highly populated, the high annual rainfall appears to be sufficient to replenish groundwater levels over the course of the year.

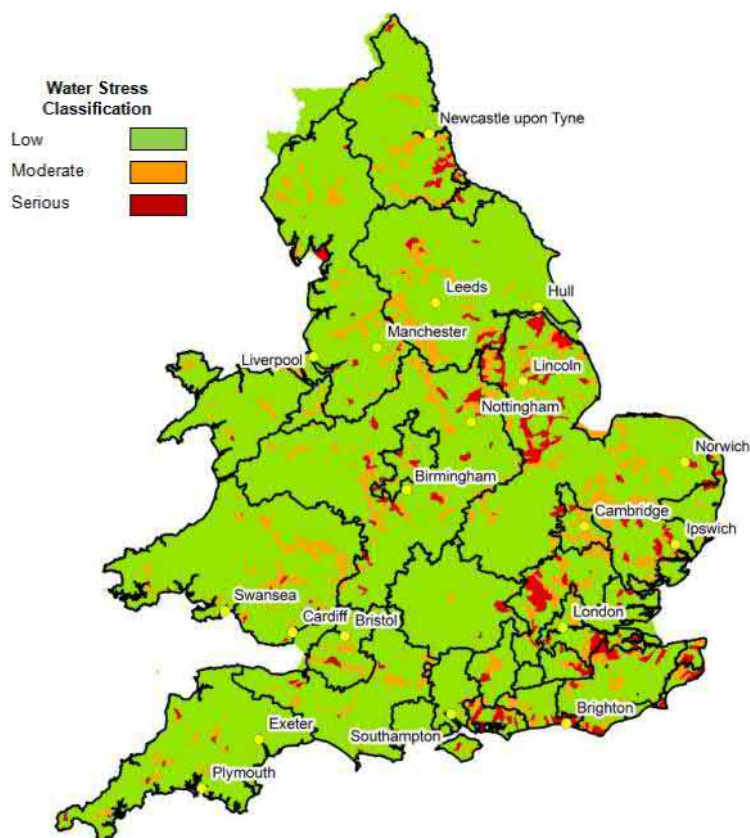


Figure 4: Areas of water stress in England and Wales⁸³.

- 4.50 An initial investigation indicates that West Lancashire lies within United Utilities' Strategic Resource Zone which currently serves approximately 7 million people in south Cumbria, Lancashire, Greater Manchester, Merseyside, most of Cheshire and a small part of Derbyshire. This zone supplies around 1,706 MI/d of potable water, which includes water imports from Wales, Cumbria, and other parts of north-west England. It constitutes a large integrated supply network that enables substantial flexibility in distributing supplies within the zone with the 'west to east link' further aiding this flexibility. This has broken the traditional division in which Greater Manchester received water from Cumbria and Merseyside received water from the River Dee (which lies partly in England and partly in Wales) and from purely Welsh sources (e.g. Lake Vyrnwy).
- 4.51 The Martin Mere SPA / Ramsar and several estuarine sites (e.g. the Ribble & Alt Estuaries SPA / Ramsar) around West Lancashire depend on sufficient freshwater input. Furthermore, the Sefton Coast SAC, partly designated for its population of great-crested newts, relies on the water table to maintain the hydrological regime in its breeding ponds.
- 4.52 The following European sites within 15km of West Lancashire are sensitive to changes in water quantity, level and flow (**sites in bold are taken forward into the following chapters**):
- **Martin Mere SPA / Ramsar (located centrally in West Lancashire)**
 - **Ribble & Alt Estuaries SPA / Ramsar (located in the northern part of West Lancashire)**
 - **Mersey Narrows & North Wirral Foreshore SPA / Ramsar (at its closest point lies approx. 8.9km to the south-west of West Lancashire)**

⁸³ Figure adapted from Environment Agency. 2013. Water stressed areas – final classification
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf.

- **Sefton Coast SAC (at its closest point lies approx. 431m to the east of West Lancashire)**
- **Dee Estuary SAC (at its closest point lies approx. 9km to the south-west of West Lancashire)**

Visual and Noise Disturbance During Construction (both in European sites and Functionally Linked Habitats)

- 4.53** Development schemes can result in disturbance to qualifying SPA / Ramsar bird species in European sites or functionally linked habitats through several mechanisms. Noise and visual disturbance arising from construction activities may result in behavioural changes (e.g. flight from the nest, cessation of foraging) in birds. Furthermore, post-construction disturbance from site usage, road traffic and operational lighting might also arise. Three of the most important factors determining the magnitude of disturbance appear to be species sensitivity, proximity of the disturbance source and timing / duration of the disturbance. Generally, the most disturbing visual and auditory stimuli are likely to involve irregular, infrequent, unpredictable loud noise events, movements or vibrations. Birds are least likely to be disturbed by activities that involve regular, predictable and quiet patterns of sound or movement. The likelihood of disturbance to SPA / Ramsar birds diminishes with distance from the source of stimuli.
- 4.54** An increasing amount of research on visual and noise disturbance of waterfowl from construction (and other activities) is now available. Both visual and noise stimuli may elicit disturbance responses, potentially affecting the fitness and survival of waterfowl and waders. Noise is a complex disturbance parameter requiring the consideration of multiple parameters, including the fact that it is not described on a linear scale, its nonadditive effect and the source-receptor distance. A high level of noise disturbance constitutes a sudden noise event of over 60dB or prolonged noise of over 72dB. Bird responses to high noise levels include major flight or the cessation of feeding, both of which might affect the survival of birds if other stressors are present (e.g. cold weather, food scarcity).
- 4.55** Generally, research has shown that above noise levels of 84dB waterfowl show a flight response, while at levels below 55dB there is no effect on their behaviour⁸⁴. These two thresholds are therefore considered useful as defining two extremes. The same authors have shown that regular noise levels should be below 70dB at the bird, as birds will habituate to noise levels below this level⁸⁵. Generally, noise is attenuated by 6dB with every doubling of distance from the source. Impact piling, the noisiest construction process of approx. 110 dB at 0.67m from source, will therefore reduce to 67-68dB by 100m away from the source. However, the relative change in noise levels compared to the baseline can also be of relevance. For example, a 10dB increase (effectively a doubling of perceived loudness) may well be disturbing while a change of less than 3dB is unlikely to even be perceptible. Even using a 'degree of change' metric rather than the 70 dB parameter, the loudest construction noise (i.e. that arising from impact piling) is likely to have fallen to below disturbing levels by 100m, and certainly by 200m, away from the source even without mitigation. That is not to say that development more than 200m from an SPA / Ramsar site will not require consideration of noise impacts, but 200m can be a useful threshold to identify those developments most likely to result in noise disturbance without mitigation.
- 4.56** Visual disturbance is generally considered to have a higher impact than noise disturbance as, in most instances, visual stimuli will elicit a disturbance response at much greater distances than noise⁸⁶. For example, a flight response is triggered in most species when they are approached to within 150m across a mudflat. Visual disturbance can be exacerbated by workers operating equipment outside machinery, undertaking sudden movements and using large machinery. Several species are particularly sensitive to visual disturbance⁸⁷, including curlew (taking flight at

⁸⁴ Cutts N & Allan J. 1999. Avifaunal Disturbance Assessment. Flood Defence Works: Saltend. Report to Environment Agency).

⁸⁵ Cutts, N., Phelps, A. and Burdon, D. 2009. Construction and waterfowl: Defining Sensitivity, Response, Impacts and Guidance. Report to Humber INCA, Institute of Estuarine and Coastal Studies, University of Hull.

⁸⁶ Research undertaken by the Institute of Estuarine & Coastal Studies, University of Hull. 2013. Available at: <http://bailey.persona-pi.com/Public-Inquiries/M4%20-%20Revised/11.3.67.pdf> [Accessed on the 01/12/2020]

⁸⁷ Ibid. Response distances to visual stimuli are given in the Estuarine & Coastal Studies report.

275m), redshank (at 250m), shelduck (at 199m) and bar-tailed godwit (at 163m). Overall, specific regard should be given to assemblage composition when identifying threshold levels for both visual and noise disturbance.

- 4.57** Disturbance can also result post-construction, although substantial changes in traffic flow are generally needed for significant noise disturbance to arise from roads. For example, a 25% increase in road traffic (e.g. through a road scheme) will result in only a 1dB(A) increase at the roadside, with a 100% increase needed to result in a 3dB(A) increase – the lowest increase in noise that is thought to be even perceivable by humans and birds. In contrast, the introduction of operational lighting of schemes into areas that are not currently lit can result in disturbance of animal species within European sites or those that rely on functionally linked habitats. Parts of West Lancashire are relatively rural, meaning that lighting for new developments may affect the usage of SPA / Ramsar habitats by birds.
- 4.58 Large structures (e.g. new bridges, offshore and onshore wind turbines), have the potential to alter bird flight paths (e.g. hunting flight paths for raptors, bird migratory paths, regular flight paths between roosting and feeding sites, and foraging routes for bats etc.). This may result in a collision risk barrier effect or displacement which could make birds either vulnerable to predation or loss of vital energy stores.
- 4.59 Animals can also be disturbed by the movement of ships. For instance, a DTI study of birds of the North West coast noted that: *“Divers and scoters were absent from the mouths of some busier estuaries, notably the Mersey... Both species are known to be susceptible to disturbance from boats, and their relative scarcity in these areas... may in part reflect the volume of boat traffic in these areas”*⁸⁸.
- 4.60 It is noted that visual and noise disturbance is relevant not only to designated sites themselves, but also to habitat that is functionally linked to such sites. Because qualifying species depend on linked habitats for foraging and roosting (see earlier impact pathway), any visual and noise disturbance effects will also apply to supporting habitats. For West Lancashire, visual and noise disturbance is most likely to be relevant to potential greenfield sites allocated in the vicinity of the Martin Mere SPA / Ramsar, the Ribble & Alt Estuaries SPA / Ramsar and functionally linked habitats.
- 4.61 The following European sites within 15km of West Lancashire are sensitive to visual and noise disturbance during construction (**sites in bold are taken forward into the following chapters**):
- **Martin Mere SPA / Ramsar (located centrally in West Lancashire)**
 - **Ribble & Alt Estuaries SPA / Ramsar (located in the northern part of West Lancashire)**
 - Mersey Narrows & North Wirral Foreshore SPA / Ramsar (at its closest point lies approx. 8.9km to the south-west of West Lancashire)
- 4.62 The Mersey Narrows & North Wirral Foreshore SPA / Ramsar lies approx. 8.9km from the boundary of West Lancashire. This is far beyond the distance at which visual and noise disturbance results to disturbance of waterfowl and waders. Therefore, in relation to this impact pathway, this site is excluded from further assessment.

Coastal Squeeze

- 4.63 Coastal squeeze⁸⁹ is a term that originates from coastal management, whereby intertidal habitats used by SPA / Ramsar birds are lost as the sea level rises and inland brownfield development (e.g. a sea wall or an industrial complex) prevents the inland migration of habitats (e.g. saltmarsh) and its associated species. As a result, habitat is ‘squeezed’ and reduces in size. This is a significant process, particularly in geographic areas that are highly urbanised or that are rapidly transitioning from an undeveloped to a developed state.

⁸⁸ DTI (2006). Aerial Surveys of Waterbirds in Strategic Wind Farm Areas: 2004/05 Final Report.

⁸⁹ For a comprehensive review of coastal squeeze please see: Doody J.P. (2013). Coastal squeeze and managed realignment in southeast England, does it tell us anything about the future? *Ocean & Coastal Management* **79**: 34-41.

- 4.64 Additionally, as development frequently takes place immediately inland from the sea wall, flood defences generally cannot be moved landwards to accommodate managed retreat of threatened habitats. This may result in gradually reducing areas of saltmarsh and mudflat habitats adjacent to built-up areas. In areas where sediment availability is low, coastal squeeze also includes an increasingly steep beach profile and foreshortening of the seaward zones.
- 4.65 By allocating residential and employment sites, Local Plans have the potential to exacerbate coastal squeeze. Generally, development sites should not add urban surfaces inland of sensitive intertidal habitats and be in line with the Shoreline Management Plan (SMP) covering given areas. SMPs determine the management approaches along specific parts of coastlines, through policies such as 'no active intervention' or 'hold the line'. In areas where 'no active intervention' is proposed, it is deemed that coastal defences and other urban structures should be avoided to allow the natural evolution of the coastline and intertidal habitats.
- 4.66 Overall, the available baseline information suggests that the following European site within 15km of the borough may potentially be impacted by coastal squeeze associated with the West Lancashire Local Plan (**the site in bold is taken forward into the following chapters**):
- **Ribble & Alt Estuaries SPA / Ramsar (located in the northern part of West Lancashire)**

Impacts from Tall Structures (e.g. Telecommunications Infrastructure or Wind Farms)

Collision Mortality

- 4.67 There is a large body of research linking wind energy developments to bird displacement and mortality. A joint report by Natural England and the RSPB⁹⁰ highlights that poorly sited wind farms can have negative impacts on birds, with such impacts varying depending on the species involved, season, weather, habitat type and individual site characteristics (e.g. topography). Wind energy is still a relatively new technology and the evidence base has increased dramatically in recent years. Generally, the two predominant effects on birds associated with wind turbines are direct collision, and disturbance displacement (which includes a phenomenon known as the 'barrier effect').
- 4.68 Generally, onshore wind farms in the UK have not been associated with high bird collision rates because they tend to be constructed in areas with little bird activity. This is in contrast to wind farms in the US and Spain, for which a high number of annual fatalities (particularly for birds of prey) have been recorded. Different species vary in their susceptibility to collision, with raptors⁹¹, gulls⁹², terns⁹³ and geese⁹⁴ appearing to be associated with particularly high collision risks. One potential explanation is that larger, less manoeuvrable species are more likely to be collision victims than, for example passerines (although this clearly does not explain the sensitivity of some species, e.g. terns which are highly manoeuvrable).
- 4.69 The statutory process of Environmental Impact Assessment (EIA) employs a method referred to as the 'Band' Collision Risk Model, which estimates the number of collision fatalities associated with specific wind energy schemes, based on parameters such as turbine height, blade width and turbine avoidance rates. While clearly helpful in estimating the impact of a scheme, many of the model parameters (e.g. turbine avoidance rate) are poorly quantified. Furthermore, collision

⁹⁰ Bright J.A., Langston R.H.W. & Anthony S. (2009). Mapped and written guidance in relation to birds and onshore wind energy development in England. A report by the Royal Society for the Protection of Birds. RSPB Research Report No. 35, 173pp.

⁹¹ Anderson, R., Neumann, N., Tom, J., Erickson, W. P., Strickland, M. D., Bourassa, M., Bay, K. J. and Sernka, K. J. (2004). Avian Monitoring and Risk Assessment at the Tehachapi Pass Wind Resource Area. Period of Performance: October 2, 1996 - May 27, 1998. National Renewable Energy Laboratory, Colorado. www.nrel.gov/publications Last accessed 12/01/2021.

⁹² Hötter, H., Thomsen, K.-M. and Jeromin, H. (2006). Impacts on biodiversity of exploitation of renewable energy sources: the example of birds and bats- facts, gaps in knowledge, demands for further research, and ornithological guidelines for the development of renewable energy exploitation. Michael-Otto-Institut im NABU, Bergenhusen. <http://bergenhusen.nabu.de/bericht/englische%20windkraftstudie.pdf> Last accessed 11/01/2021.

⁹³ Everaert, J. and Stienen, E. W. M. (2006). Impact of wind turbines on birds in Zeebrugge (Belgium) - Significant effect on breeding tern colony due to collisions. *Biodiversity and Conservation* 16: 3345-3359.

⁹⁴ Moorehead, M. and Epstein, L. (1985). Regulation of small-scale energy facilities in Oregon: Background report. Volume 2. Oregon Department of Energy, Salem, USA.

models assume that collision rate relates to bird abundance, which is not necessarily the case. The RSPB recommends that *estimates of annual collision rates and avoidance rates should be treated with caution, and used as comparative rather than absolute measures*'.

Disturbance Displacement and Impacts on Flightlines

- 4.70 Wind turbines may also result in disturbance displacement, rendering habitats currently used by birds unsuitable for future use. In a review across 129 wind farms, Hoetker et al. (2006) found that disturbance displacement effects were most common in the overwintering period, with highest impacts on waders and wildfowl⁹⁵. One potential explanation for this is that overwintering birds display lower site fidelity, moving to alternative sites more readily than breeding birds when disturbed. Notwithstanding this, further work has evidenced disturbance displacement from wind energy schemes in breeding golden plover of at least 200m and other breeding waders of between 0 – 800m^{96,97}. Disturbance displacement can affect bird species in several ways, including the direct loss of habitat (e.g. for foraging, resting, moulting or nesting) or by affecting productivity. The latter could be the result of high energetic costs associated with the displacement or displacement to potentially less plentiful foraging grounds. While it is frequently suggested that birds may habituate to wind turbines over time, research indicates that bird abundances decline over time and that there is in fact little empirical evidence for a strong habituation effect.
- 4.71 Related to this is a process known as the 'barrier effect', whereby larger scale wind farms prevent birds from using their established foraging / migratory flightlines. This can provide a barrier to bird movements, resulting in significant additional energetic costs as birds must circumvent the area of development. This effect is likely to be more pronounced offshore because seabirds travel greater return distances between their colonies and foraging grounds, such that the increased energetic requirements are likely to become disproportionately impactful. Research has shown that wind farms lead to avoidance behaviour in migrating birds. For example, common eiders had greater trajectory curvatures post wind farm construction, resulting in an additional 500m travelled⁹⁸. However, in relation to migration episodes of 1,400km, the further energetic costs were considered to be trivial. In another study it was established that the overall energetic costs of avoiding wind farms were highest for species with high wing loadings, such as shag, cormorant, guillemot, and puffin, which typically only undertake short provisioning flights⁹⁹. For all species the extra flight costs to avoid wind energy developments were lower than those associated with food shortages or adverse weather. However, it is to be noted that pressures from wind farms are additive to those of other stressors and a cumulative effect with other schemes requires consideration.
- 4.72 Figure 5 below shows a map of areas known for their European bird interest that are sensitive to wind energy development schemes. The map is based on the distributional data of twelve susceptible bird species (ten of the species listed on Annex I of the EU Birds Directive) and the geographic location of statutory SPAs. It can be seen that the coastal areas around West Lancashire are identified as being highly sensitive.

⁹⁵ Hötker, H., Thomsen, K.-M. and Jeromin, H. (2006). Impacts on biodiversity of exploitation of renewable energy sources: the example of birds and bats- facts, gaps in knowledge, demands for further research, and ornithological guidelines for the development of renewable energy exploitation. Michael-Otto-Institut im NABU, Bergenhusen.
<http://bergenhusen.nabu.de/bericht/englische%20windkraftstudie.pdf> Last accessed 11/01/2021.

⁹⁶ Pearce-Higgins, J. W., Stephen, L., Langston, R. H. W. and Bright, J. A. (2008). Assessing the cumulative impacts of wind farms on peatland birds: A case study of golden plover *Pluvialis apricaria* in the UK. *Mires and Peat* 4: 1-13.

⁹⁷ Pearce-Higgins J.W. Stephen L., Langston R.H.W., Bainbridge I.P. & Bullman R. (2009). The distribution of breeding birds around upland wind farms. *Journal of Applied Ecology* 46: 1323-1331.

⁹⁸ Masden E.A., Haydon D.T., Fox A.D., Furness R.W., Bullman R. & Desholm M. (2009). Barriers to movement: Impacts of wind farms on migrating birds. *ICES Journal of Marine Science* 66: 746-753.

⁹⁹ Masden E.A., haydon D.T., Fox A.D. & Furness R.W. (2010). Barriers to movement: Modelling energetic costs of avoiding marine wind farms amongst breeding seabirds. *Marine Pollution Bulletin* 60: 1085-1091.

Sensitivity rating

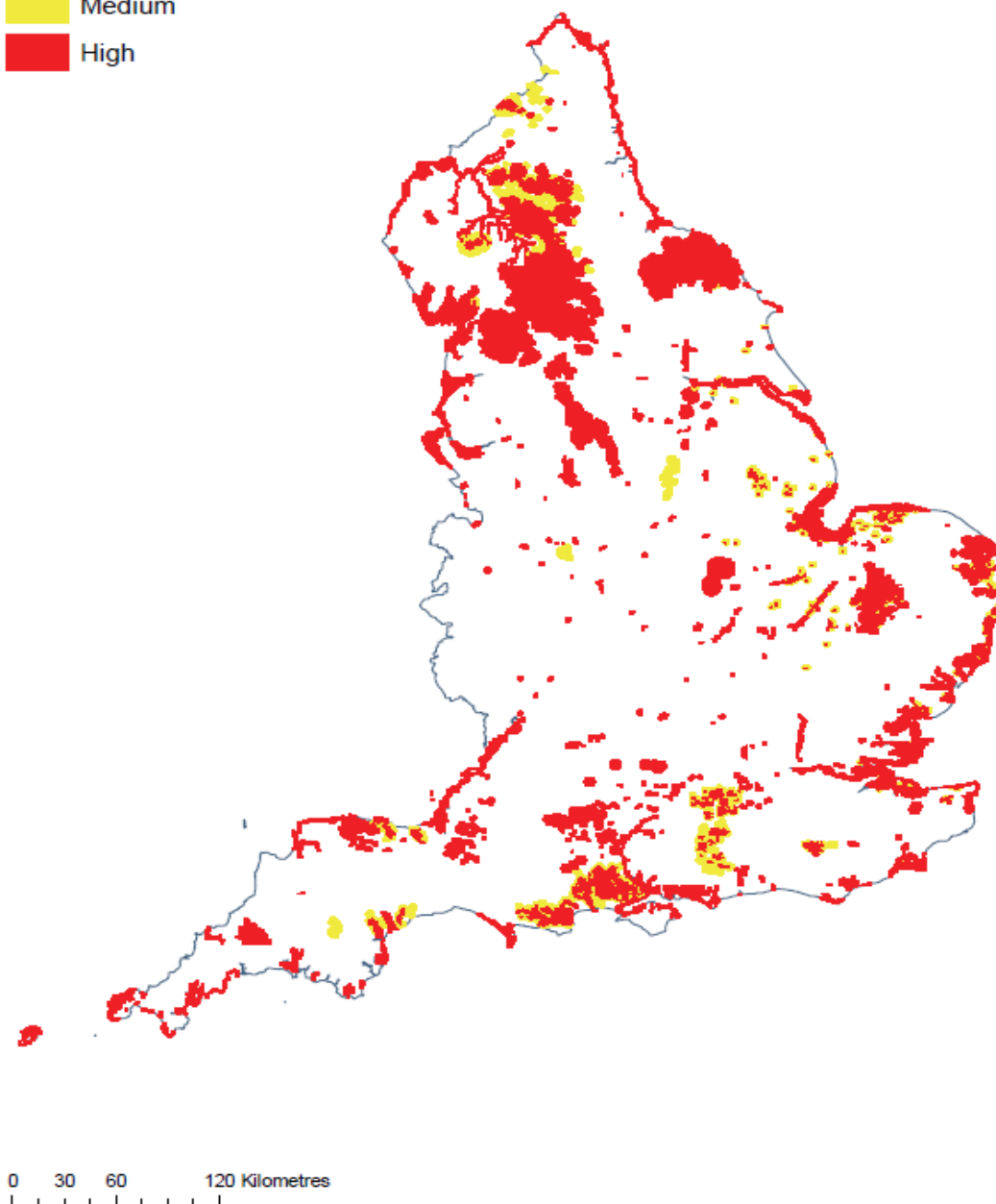
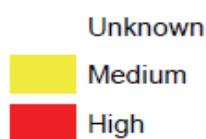


Figure 5: Map of sensitive bird areas in relation to onshore wind farms in England. Note that this map is based on the highest sensitivity rating for any of the species or sites included, in each constituent 1-km square. (reproduced from Bright et al., 2009¹⁰⁰).

4.73 The following European sites within 15km of West Lancashire are sensitive to the development of tall structures (e.g. telecommunications infrastructure and wind farms), which could lead to collision mortality, disturbance displacement and altered flightlines (**sites in bold are taken forward into the following chapters**):

- **Martin Mere SPA / Ramsar (located centrally in West Lancashire)**

¹⁰⁰ Bright J.A., Langston R.H.W. & Anthony S. (2009). Mapped and written guidance in relation to birds and onshore wind energy development in England. A report by the Royal Society for the Protection of Birds. RSPB Research Report No. 35, 173pp.

- **Ribble & Alt Estuaries SPA / Ramsar (located in the northern part of West Lancashire)**
- **Mersey Narrows & North Wirral Foreshore SPA / Ramsar (at its closest point lies approx. 8.9km to the south-west of West Lancashire)**
- **Liverpool Bay SPA (at its closest point lies approx. 3.6km to the west of West Lancashire)**

4.74 While the qualifying birds in the Liverpool Bay SPA and Mersey Narrows & North Wirral Foreshore SPA / Ramsar are potentially sensitive to the impacts from tall structures, the sites lie too far away from the boundary of West Lancashire for there to be any disturbance displacement effects. However, birds from this site travelling within the wider network of north-western SPAs / Ramsar, may be at risk from collision mortality arising from wind farms built in West Lancashire. Therefore, in relation to this impact pathway, these sites are included for further assessment.

5. Test of Likely Significant Effects (LSEs)

Overview of policy approaches with the potential to cause LSEs

- 5.1 The following section provides an overview of policy options that provide for residential and employment growth and detail the outcome of the Likely Significant Effects assessment. This identifies policies and site allocations that (prior to considering the role of mitigation) have a potential to result in LSEs upon European sites.
- 5.2 The full Likely Significant Effects assessment of policy options within the West Lancashire Local Plan can be found in Appendix 2.

Preferred Policy Approaches

- 5.3 The following policy approaches have been identified as providing for residential and employment growth within West Lancashire, or otherwise having a potential to cause LSEs on European sites (see Appendix 2 for screening table). These policy approaches therefore present potential impact pathways through which Likely Significant Effects (LSEs) on European sites might arise, prior to the consideration of mitigation measures:

- Delivering Sustainable Development – identifies the settlement hierarchy in West Lancashire, which will determine the distribution and quantum of growth across the borough
- Housing and Employment Land Requirements – stipulates the quantum of housing and employment development, which is a key determinant of the magnitude of impact pathways
- Strategic Development Sites – details of strategic development sites will come forward at the next stage of the Local Plan, so cannot be screened out for LSEs at this stage.
- Preserving and enhancing the Borough's Landscape and Land Resources – prevents land use changes in vulnerable landscapes, but supports flood protection and tourism developments in coastal areas
- Where housing can go – determines the geographic distribution of housing across West Lancashire and provides detail on individual housing allocations, both with likely implications for impact pathways (e.g. recreational pressure, water quality)
- Gypsies and Travellers and Travelling Showpeople – provides potential additional allocations for gypsy and traveller sites, which would result in a population increase
- Accommodation for Temporary Agricultural Workers – supports non-permanent accommodation for agricultural workers in the countryside, with impacts similar to those of housing allocations
- Providing and Managing Employment Areas – details the protection of strategic employment areas and support for new employment uses across West Lancashire, which is connected to various impact pathways such as atmospheric pollution (via an increase in commuter traffic) and loss of functionally linked habitat
- Developing the Rural and Visitor Economy – protects existing non-residential uses in the countryside, while also allocating specific rural development sites that may be linked to several impact pathways, such as atmospheric pollution and loss of functionally linked habitat

- Adapting our Town and Local Centres – this preferred policy approach specifies the hierarchy of town and local centres, which will in turn influence the distribution of new non-residential growth across West Lancashire
- Communications and Digital Connectivity Infrastructure – supports digital and communications infrastructure with the potential to impact SPA / Ramsar birds
- Low Carbon and Renewable Energy – designates specific opportunity areas for wind and energy developments, with potential impacts on SPA / Ramsar birds

Local plans to be considered ‘in-combination’

5.4 It is obligatory to not only assess LSEs of a proposed plan alone, but also to investigate whether there might be ‘in-combination’ effects with plans proposing development in other authorities surrounding a European protected site. In practice, such an ‘in-combination’ assessment is of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

5.5 For the purposes of this HRA, several relevant authorities have been identified that have developed their own Local Plans and Core Strategies, outlining residential and / or employment growth within their own boundary. These include Fylde, Central Lancashire, Wigan, St Helens, Knowsley and Sefton. Table 4 summarises the proposed residential and employment growth allocated within the respective Plans of these authorities.

Table 4: Overview of the extent of residential and employment development to be delivered in authorities adjoining West Lancashire Borough, according to adopted Core Strategies and Local Plans.

Local Authority	Number of Dwellings	Total Employment Space (ha)
Fylde (2011 – 2032) ¹⁰¹	8,715	62
Central Lancashire (2010 – 2026) ¹⁰²	22,158	454
Wigan (2011-2026) ¹⁰³	18,365	200
St Helens (2020-2035) ¹⁰⁴	9,234	265
Knowsley (2010-2028) ¹⁰⁵	8,100	164
Sefton (2012-2030) ¹⁰⁶	11,520	81.6
Total	78,092	1,226.6

5.6 In 2019, Natural England advised that the Alt Crossens scheme also required consideration in relation to the West Lancashire Local Plan. The Alt Crossens pumping stations are two of the largest in Europe and are operated in conjunction with several satellite pumping stations. The Environment Agency’s proposal to switch off these pumping stations could lead to the flooding of low-lying agricultural land in their proximity, including in parts of West Lancashire. However, it is concluded that there is no potential interaction with development proposed across West Lancashire since the key population centres are remote from the area that will be permanently wet. Therefore, the Alt Crossens scheme is excluded from further consideration in this HRA.

¹⁰¹ Fylde Local Plan to 2032, adopted in October 2018. Available at: <https://new.fylde.gov.uk/wp-content/uploads/2019/09/2-Fylde-Local-Plan-to-2032.pdf> [Accessed on the 28/06/2021]

¹⁰² Central Lancashire Core Strategy, adopted in July 2012. Note that this includes the authorities of South Ribble, Chorley and Preston. Available at: <https://centrallocalplan.lancashire.gov.uk/media/1032/central-lancashire-core-strategy-july-2012-v1.pdf> [Accessed on the 28/06/2021].

¹⁰³ Wigan Local Plan Core Strategy, adopted in September 2013. Available at: <https://www.wigan.gov.uk/Docs/PDF/Council/Strategies-Plans-and-Policies/Planning/Adopted-Core-Strategy.pdf> [Accessed on the 28/06/2021]

¹⁰⁴ St Helens Borough Local Plan, draft submitted in 2019. Available at <https://www.sthelens.gov.uk/planning-building-control/planning-policy/local-plan/> [Accessed on the 28/06/2021]

¹⁰⁵ Knowsley Local Plan Core Strategy, adopted in January 2016. Available at: <https://localplanmaps.knowsley.gov.uk/documents/knowsley-local-plan-adopted-core-strategy.pdf> [Accessed on the 28/06/2021].

¹⁰⁶ Sefton Local Plan, adopted in April 2017. Available at: <https://www.sefton.gov.uk/media/1133/a-local-plan-for-sefton-for-adoption-final.pdf> [Accessed on the 28/06/2021]

Recreational Pressure

Martin Mere SPA / Ramsar

- 5.7 The Martin Mere SPA / Ramsar is designated for several waterfowl species, including Bewick's swan, whooper swan, pink-footed goose, Eurasian teal and northern pintail. All these bird species are sensitive to recreational pressure to some extent. The relatively secluded habitats within the site (open standing water, damp grassland and swamp / tall herb fen) are crucial in providing refuge from human disturbance. The Martin Mere Wetland Centre (which encompasses the SPA / Ramsar) is owned and managed by the Wildfowl & Wetlands Trust (WWT). The Wetland Centre comprises a network of well-established paths and hides, which enable visitors to observe wildlife with minimal disturbance. The marshy nature of the site encourages visitors to stick to paths and any sensitive areas are fenced off from public access. Overall, given the adequate visitor management that is in place, it is concluded that LSEs of the West Lancashire Local Plan on the Martin Mere SPA / Ramsar regarding recreational pressure can be excluded. The site is screened out from Appropriate Assessment in relation to this impact pathway.

Ribble & Alt Estuaries SPA / Ramsar

- 5.8 The qualifying waterfowl and waders of the Ribble & Alt Estuaries SPA / Ramsar are sensitive to recreational disturbance from activities carried out in both supralittoral and intertidal zones (e.g. dog walking or horse riding) as well as on the water (e.g. kayaking, windsurfing and sailing). Depending on the distance to the receptor species, any of these activities can impact the natural roosting and foraging behaviours displayed by qualifying birds. For example, allocation of significant residential growth, especially in the northern part of West Lancashire, will lead to an increase in recreational pressure in estuarine sites. Natural England's Site Improvement Plan indicates that public access / disturbance from both terrestrial and marine-based recreation is a current threat to the site¹⁰⁷ and this is confirmed by the Supplementary Advice on the Conservation Objectives. Furthermore, disturbance impacts are likely to be exacerbated by the growth in nearby urban centres, such as Preston, resulting in cumulative effects on birds. Recreational pressure is a well-established impact pathway for the wider Liverpool City Region, with many authorities developing interim strategic approaches to recreation in order to ensure compliance with the Habitats & Species Regulations 2019 (as amended). Overall, LSEs of the West Lancashire Local Plan on the Ribble & Alt Estuaries SPA / Ramsar regarding recreational pressure cannot be excluded. The site is screened in for Appropriate Assessment.

Sefton Coast SAC

- 5.9 The Sefton Coast SAC is partly designated for several types of dune habitats. All types of dunes are sensitive to erosion and shifting of sediments arising from recreational trampling. This also applies to associated plant species such as creeping willow and petalwort. Furthermore, an increase in the number of dog walkers can lead to localised nutrient enrichment, potentially resulting in changes in plant community composition. Natural England's Site Improvement Plan that covers the SAC, highlights dog fouling as a current threat to its dune systems¹⁰⁸. A review of the evidence base available on recreational pressure shows that at some sites within the SAC (e.g. Ainsdale-on-sea) dog walkers account for up to 88% of all visitors. At its closest point, the Sefton Coast SAC lies only 431m to the west of West Lancashire, meaning that most parts of the borough lie well within the typical catchment of a coastal site, albeit the main population centres are at a considerably greater distance. Overall, LSEs of the West Lancashire Local Plan on the Sefton Coast SAC regarding recreational pressure cannot be excluded. The site is screened in for Appropriate Assessment.

¹⁰⁷ Available at: <http://publications.naturalengland.org.uk/publication/6274126599684096> [Accessed on the 23/06/2021]

¹⁰⁸ Available at: <http://publications.naturalengland.org.uk/publication/6274126599684096> [Accessed on the 23/06/2021]

Mersey Narrows & North Wirral Foreshore SPA / Ramsar, Dee Estuary SAC and Mersey Estuary SPA / Ramsar

- 5.10 The Mersey Narrows & North Wirral Foreshore SPA / Ramsar, the Dee Estuary SAC and the Mersey Estuary SPA / Ramsar lie approx. 8.9km, 9km and 15.1km respectively to the south-west boundary of West Lancashire. The two SPAs / Ramsars are designated for several overwintering bird species as well as breeding common tern. Natural England's Site Improvement Plan for the Mersey Narrows and North Wirral Foreshore SPA / Ramsar indicates that recreation and resulting direct disturbance to birds is the primary threat / pressure for the site¹⁰⁹. The SAC is partly designated for several aquatic habitats (e.g. intertidal sand- and mudflats) and botanic assemblages (e.g. *Salicornia* and Atlantic salt meadows). These features are all sensitive to physical damage from abrasion, resulting in destabilisation of sediments, changes in habitat structure as well as community composition. While housing growth in the wider Liverpool region clearly is a concern for these sites, several points should be considered in relation to West Lancashire. While the borough lies within a typical recreational catchment for coastal sites (up to 10km), the actual by-road distance equates to roughly 14km (and further to the Dee Estuary SAC and Mersey Estuary SPA / Ramsar) and would involve a crossing of the Kingsway Tunnel (toll). A disturbance and recreation study undertaken by Footprint Ecology, shows that 75% of all visitors to the Mersey Narrows and North Wirral Foreshore SPA / Ramsar (in this case the Leasowe Breakwater survey point) travel 2.2km from home, placing West Lancashire well outside its catchment¹¹⁰. The core recreational catchment for survey points in the Dee Estuary SAC was even smaller. This may partly be explained by the presence of similar habitats and sceneries (e.g. in the Ribble & Alt Estuaries SPA / Ramsar and Sefton Coast SAC) much closer to conurbations in West Lancashire. In a meeting to inform the HRA of the withdrawn West Lancashire Local Plan¹¹¹, Natural England advised that 5.2km measured from coastal European sites was an appropriate Zone of Influence (ZoI) to consider.
- 5.11 Considering the above, it is concluded that LSEs of the West Lancashire Local Plan on the Mersey Narrows & North Wirral Foreshore SPA / Ramsar, the Dee Estuary SAC and the Mersey Estuary SPA / Ramsar regarding recreational pressure can be excluded. These sites are screened out from Appropriate Assessment in relation to this impact pathway.

Atmospheric Pollution

Ribble and Alt Estuaries SPA / Ramsar

- 5.12 The Ribble & Alt Estuaries SPA / Ramsar is designated for several species of waterfowl (e.g. Eurasian wigeons and curlews) that are dependent on Atlantic salt meadows in the littoral zone. Furthermore, the site is also designated for common terns, which depend on bare sediment in the supralittoral zone (for example in coastal stable dune grasslands and shifting coastal dunes) for building their nests. APIS identifies the following nitrogen Critical Loads (CLs) for the supporting habitats of these species:
- Saltmarsh – CL of 20-30 kg N/ha/yr
 - Coastal stable dune grassland (acidic type) – CL of 8-10 kg N/ha/yr
 - Shifting coastal dunes – CL of 10-20 kg N/ha/yr
- 5.13 Exceedances of the CLs may lead to changes in the composition of these botanic communities, including an increase in tall grasses and late successional species, as well as a decrease in prostate plants. For common terns in particular, a significant increase in nitrogen deposition may reduce the amount of suitable bare habitat for nesting.

¹⁰⁹ Available at: <http://publications.naturalengland.org.uk/publication/6579320399069184> [Accessed on the 23/06/2021]

¹¹⁰ Liley D., Panter C., Marsh P. & Roberts J. (2017). Recreational activity and interaction with birds within the SSSIs on the North-West coast of England. Footprint Ecology report for Natural England. 127pp.

¹¹¹ Meeting between West Lancashire Borough Council (WLBC) and Natural England held at the WLBC offices in Ormskirk on Monday 29th April 2019.

- 5.14 Coastal saltmarsh is concentrated in the northern part of the SPA / Ramsar, along the Ribble estuary. With regard to coastal saltmarsh within the Ribble & Alt Estuaries SPA / Ramsar, the only section of this habitat within 200m of a major road occurs along the A584 in the adjoining authority of Fylde (approx. 163m from the road). However, a review of Census 2011 journey-to-work data indicates that neither Fylde nor Blackpool, the authority to which the A584 connects, are within the top ten sources or destinations of commuter traffic associated with West Lancashire. Therefore, it is concluded that this road will not be a significant journey-to-work route for residents of new development in West Lancashire, particularly given the intention to focus growth on the existing main population centres. LSEs of the Local Plan on saltmarsh habitat within the SPA / Ramsar can be excluded.
- 5.15 The dune habitats (and potential nesting locations for terns) that fall within the SPA / Ramsar, stretch along the coastline in the adjoining authority of Sefton. However, the closest stretch of SPA / Ramsar dune habitat lies further than 500m from the A565. This is beyond the 200m screening distance used for nitrogen deposition effects. Therefore, LSEs of the West Lancashire Local Plan on the dune habitats within the SPA / Ramsar can be excluded. The site is screened out from Appropriate Assessment in relation to this impact pathway. It is to be noted that some dune habitat outside the SPA / Ramsar (which coincidentally may also support breeding common terns) lies within 200m of the A565. However, this is discussed in the section addressing the Sefton Coast SAC below.

Sefton Coast SAC

- 5.16 The Sefton Coast SAC is primarily designated for a variety of Annex I habitats that are all sensitive to significant increases in atmospheric nitrogen deposition, which may lead to a shift in plant community composition. Furthermore, petalwort is present within the site and may be outcompeted by graminoids under increased nutrient regimes. APIS identifies the following nitrogen CLs for the SAC's qualifying features:
- Fixed coastal dunes with herbaceous vegetation – CL of 8-10 kg N/ha/yr (acid type stable dune grassland)
 - Humid dune slacks – CL of 10-15 kg N/ha/yr (acid type dune slacks)
 - Embryonic shifting dunes – CL of 10-20 kg N/ha/yr
 - Shifting dunes along the shoreline with *Ammophila arenaria* – CL of 10-20 kg N/ha/yr
 - Atlantic decalcified fixed dunes – CL of 10-20 kg N/ha/yr
 - Dunes with *Salix repens* ssp *argentea* (*Salicion arenariae*) – CL of 10-20 kg N/ha/yr
 - Petalwort *Petalophyllum ralfsii* – CL of 10-20 kg N/ha/yr
- 5.17 The Sefton Coast SAC lies in the adjoining authority of Sefton, stretching along the coastline in a north-easterly to south-westerly direction. According to Census 2011 data, Sefton is the most frequent origin (25.1% of commuter journeys) and destination (25.7%) of commuter traffic associated with West Lancashire. Therefore, it must be reasonably assumed that a relatively large portion of future residents would also travel to work in Sefton. The closest point in the SAC encompassing dune habitat, lies approx. 155m from the A565 (Liverpool Road) between Southport and Formby. According to Natural England's Priority Habitat inventory there are Atlantic decalcified fixed dunes and dunes with *Salix repens* in this part of the SAC. However, this road is likely to be little used for journeys to work by residents of West Lancashire. When travelling to Formby or Southport there are direct routes that avoid this stretch of road, while for most journeys between West Lancashire and the LCR more broadly the A59 or M58 are far more likely routes.
- 5.18 Overall, given that the A565 is unlikely to be a significant journey-to-work route, LSEs of the West Lancashire Local Plan on the Sefton Coast SAC regarding atmospheric pollution can be excluded and the site is screened out from Appropriate Assessment (AA) in relation to this impact pathway.

Mersey Narrows & North Wirral Foreshore SPA / Ramsar

5.19 The Mersey Narrows & North Wirral Foreshore SPA / Ramsar lies on the Wirral Peninsula, relatively far from West Lancashire. A trip to anywhere near the site would involve crossing multiple authorities (Sefton, Liverpool) and a toll tunnel. Census 2011 data indicate that Wirral is not a top ten origin or destination of West Lancashire commuter traffic. Therefore, a realistic link between the West Lancashire Local Plan and nitrogen deposition to the SPA / Ramsar cannot be drawn. Furthermore, the site is designated for wader species that are not sensitive to nitrogen deposition. Indeed, some of these species could actually benefit from additional 'fertilisation' because they rely on invertebrate prey that is likely to increase in abundance with rising nitrogen concentrations. APIS indicates that the only air-quality sensitive species of the SPA / Ramsar is the breeding common tern. However, there is no coastal vegetated shingle or dune habitat on the Wirral peninsula (the SPA / Ramsar terns nest primarily in the Seaforth Nature Reserve in Sefton). Overall, LSEs of the West Lancashire Local Plan on the Mersey Narrows & North Wirral Foreshore SPA / Ramsar regarding atmospheric pollution can be excluded. The site is screened out from Appropriate Assessment in relation to this impact pathway.

Dee Estuary SAC

5.20 The Dee Estuary SAC largely overlaps with the Mersey Narrows & North Wirral Foreshore SPA / Ramsar, and a commuter journey from or to West Lancashire would require traversing Sefton, Liverpool, and the toll bridge. It encompasses habitats with varying degrees of sensitivity to nitrogen deposition. According to APIS, the most sensitive habitats in the SAC are the fixed coastal dunes with herbaceous vegetation (CL of 8-15 kg N/ha/yr), humid dune slacks (10-20 kg N/ha/yr), embryonic shifting dunes (10-20 kg N/ha/yr) and shifting dunes with *Ammophila arenaria* (10-20 kg N/ha/yr). An exceedance of nitrogen CLs may result in the biomass increase of tall graminoids, soil acidification and a loss of lichen species. However, these habitats occupy a relatively small proportion of the SAC (considerably less than 1% according to the JNCC website). The other main habitat with sensitivity to nitrogen deposition is the Atlantic salt meadows and *Salicornia* vegetation, both with a CL of 20-30 kg N/ha/yr, for which the lower limit is currently exceeded in places. Saltmarsh lies in the south-western part of Wirral, while dune habitat within the SAC is located in the Welsh authorities of Flintshire and Denbighshire.

5.21 According to Census 2011 data, none of these authorities are significant sources or destinations of commuter traffic associated with West Lancashire. As such, a realistic link between development in West Lancashire and sensitive habitats within the SAC cannot be drawn. Overall, LSEs on the Dee Estuary SAC regarding atmospheric pollution can be excluded. The site is screened out from Appropriate Assessment in relation to this impact pathway.

Loss of Functionally Linked Habitat

Martin Mere SPA / Ramsar

5.22 The Martin Mere SPA / Ramsar is designated for several non-breeding species of waterfowl, most notably pink-footed goose, whooper swan and Bewick's swan. All these species roost on open water at night and forage in surrounding farmland during the day. Natural England's Site Conservation Objectives Supplementary Advice Note specifies that the maintenance of supporting habitats (both within and outside the designated site boundary) is essential to the bird populations, noting specifically surrounding off-site arable habitat¹¹². Therefore, the allocation of agricultural greenfield sites in the West Lancashire Local Plan could lead to the loss of functionally linked foraging patches for SPA / Ramsar birds. LSEs of the West Lancashire Local Plan on the Martin Mere SPA / Ramsar regarding loss of functionally linked habitat cannot be excluded. The site is screened in for Appropriate Assessment.

Ribble & Alt Estuaries SPA / Ramsar

5.23 The qualifying assemblage of the Ribble & Alt Estuaries SPA / Ramsar encompasses a range of waders and waterfowl with varying dependency on functionally linked habitats. Most waders are

¹¹² Available at: <http://publications.naturalengland.org.uk/publication/4833056372293632> [Accessed on the 24/06/2021]

primarily restricted to the SPA boundary, although some species may occasionally roost outside the SPA. Species like teal and wigeon are likely to at least sometimes forage in off-site grassland. As highlighted in relation to the Martin Mere SPA / Ramsar, pink-footed geese and Bewick's swans are more tightly associated with functionally linked habitats, particularly arable land. For example, Barton & Pollock note that surrounding farmland sustains high numbers of roosting and foraging pink-footed geese¹¹³. The northern and western areas of West Lancashire (areas which lie close to the SPA / Ramsar) are relatively rural in nature and the development of greenfield sites here could result in the loss of functionally linked habitat. LSEs of the West Lancashire Local Plan on the Ribble & Alt Estuaries SPA / Ramsar regarding the loss of supporting habitats cannot be excluded. Therefore, this site is screened in for Appropriate Assessment.

Mersey Narrows & North Wirral Foreshore SPA / Ramsar

5.24 While the Mersey Narrows & North Wirral Foreshore SPA / Ramsar is designated for mobile waders and seabirds, none of these species are strongly associated with habitats outside the designated site boundary. Bar-tailed godwits and knot primarily roost and forage on the North Wirral Foreshore. While there is regular movement of individuals from this site to the Ribble and Alt Estuaries SPA / Ramsar (as indeed there is with other estuarine sites in north-west England), these movements are unlikely to involve stopovers in off-site habitats. Given the evidence, LSEs of the West Lancashire Local Plan on the Mersey Narrows & North Wirral Foreshore SPA / Ramsar regarding loss of functionally linked habitat can be excluded. This site is screened out from Appropriate Assessment in relation to this impact pathway.

Sefton Coast SAC

5.25 The Sefton Coast SAC is partly designated for its mobile great-crested newt population (Annex II species), which is partly dependent on terrestrial habitats outside the established SAC boundary. Outside the breeding season, great-crested newts utilise terrestrial habitats (e.g. meadows, tussocky grassland, scrub, woodland, farmland) for dispersal, shelter and foraging. There are significant inter-individual differences in dispersal distance, but Natural England's Site Conservation Objectives Supplementary Advice Note highlights that the expected core off-site distance travelled by newts around breeding ponds is 500m. The primary newt breeding ponds lie in the Ainsdale Sand Dunes National Nature Reserve (NNR) and Ainsdale Sandhills Local Nature Reserve, in the part of the SAC that lies closest to West Lancashire (approx. 431m). However, in order to use terrestrial habitats in West Lancashire, great-crested newts would need to cross the A565, which is likely to act as a barrier to dispersal. Overall, LSEs of the West Lancashire Local Plan on the Sefton Coast SAC regarding loss of functionally linked habitat can be excluded. The site is screened out from Appropriate Assessment in relation to this impact pathway.

Water Quality

Martin Mere SPA / Ramsar

5.26 The qualifying bird assemblage of the Martin Mere SPA / Ramsar has some sensitivity to negative changes in water quality. While geese and swans, which mainly use the SPA / Ramsar for roosting, are unlikely to be affected by increases in the volume of treated sewage effluent and phosphate concentrations, teal and pintails are more sensitive due to potential cascading effects on the SPA / Ramsar food web. The mere sits amidst a complex network of streams and drainage ditches, which supplies freshwater to the site. But a brief review of the European Commission Urban Waste Water website¹¹⁴, indicates that Burscough Wastewater Treatment Work (WwTW) is located immediately south of the SPA / Ramsar boundary. The WwTW discharges into the Boat House Sluice, which partly runs through the site's marshland habitats. As such, any allocations within the catchment of these works would have the potential to increase phosphate concentrations in the Martin Mere SPA / Ramsar. The likelihood of any impacts will depend on

¹¹³ Barton C. & Pollock C. (2005). Review of overwintering swans and geese in the SEA 6, 7 & 8 areas. Department for Trade and Industry (DTI).

¹¹⁴ Available at: <https://uwwt.dtu.eu/United-Kingdom/treatment-plant/ukennwuutp000025/2016>. It is to be noted that while this resource does not show all WwTWs in respective locations, it is a suitable starting point for assessing hydrological linkages.

the distribution of development allocated in the West Lancashire Local Plan, which are not yet available. Therefore, LSEs of the Local Plan on the Martin Mere SPA / Ramsar regarding water quality cannot be excluded. The site is screened in for Appropriate Assessment.

Ribble & Alt Estuaries SPA / Ramsar

5.27 The assemblage of overwintering birds in the Ribble & Alt Estuaries SPA / Ramsar, especially waders and seabirds, are sensitive to the input of nitrogen from treated sewage effluent. High nitrogen concentrations in the water can cause phytoplankton and macroalgal blooms, leading to increased turbidity levels and decreased dissolved oxygen concentrations. This can result in knock-on impacts on fish, epifauna and infauna communities, potentially reducing prey availability for SPA / Ramsar birds. Natural England's Site Improvement Plan does not specify water pollution as a threat / pressure to the site and the Environment Agency's Weight of Evidence approach characterises the risk of eutrophication in the site as low. Nonetheless, several water catchments that are linked to West Lancashire drain into the Rivers Ribble and Alt, including the Operational Catchments 'Crossens System', Alt and Douglas. Therefore, development under the West Lancashire Local Plan is likely to contribute additional nitrogen from treated sewage effluent to the SPA / Ramsar. LSEs of the West Lancashire Local Plan on the Ribble & Alt Estuaries SPA / Ramsar regarding water quality cannot be excluded. The site is screened in for Appropriate Assessment.

Liverpool Bay SPA

5.28 The main rationale behind the designation of the Liverpool Bay SPA is to protect the foraging grounds of little and common terns, little terns, as well as several seabird species (e.g. red-throated diver, common scoter). These birds all rely on fish species as their main prey sources. Treated sewage discharge from West Lancashire draining into the sea along the Sefton coastline has the potential to affect prey availability through eutrophication effects. However, several factors require consideration in relation to the SPA. At its closest point, the SPA lies approx. 640m from the coast. The long flow path between West Lancashire and the SPA indicates that any nitrogen is likely to be sufficiently attenuated and diluted by the time it arrives in SPA waters. Furthermore, the open nature, mixing conditions and relatively cold water means that the site is at relatively low risk from eutrophication. This is supported by Natural England's Site Improvement Plan, which does not highlight point-source pollution as a threat / pressure to the site. Therefore, LSEs of the West Lancashire Local Plan on the Liverpool Bay SPA regarding water quality can be excluded. The site is screened out from Appropriate Assessment.

Mersey Narrows & North Wirral Foreshore SPA / Ramsar and Dee Estuary SAC

5.29 The Mersey Narrows & North Wirral Foreshore SPA / Ramsar and the Dee Estuary SAC, both within 15km of West Lancashire, are sites that are sensitive to water pollution (both from treated wastewater and industrial pollutants). Both the Dee Estuary and the Lower River Dee have problems with nutrient enrichment, failing nitrogen and macroalgal targets. Natural England's Site Improvement Plan highlights that industrial sites are also point-sources of pollutants¹¹⁵. However, while a clear sensitivity to water quality changes is present in these sites, it is very unlikely that West Lancashire would contribute to pollutant loadings. For example, Skelmersdale WwTW, the works serving the most south-westerly conurbations in West Lancashire, discharge into the River Douglas. This river is a tributary of the Ribble Estuary in the northern part of the authority. It is concluded that there is no hydrological linkage between the West Lancashire Local Plan and these two European sites. Therefore, they are screened out from Appropriate Assessment in relation to this impact pathway.

Sefton Coast SAC

5.30 Great-crested newts, one of the qualifying features of this SAC, are potentially sensitive to significant changes in water quality. The newts rely on partially vegetated breeding ponds with an adequate supply of freshwater invertebrates. These can be impacted by eutrophication and

¹¹⁵ Available at: <http://publications.naturalengland.org.uk/publication/6579320399069184> [Accessed on the 24/06/2021]

concomitant reductions in dissolved oxygen concentrations. This may primarily be brought about by an increase in treated sewage effluent arising from development, if relevant freshwater bodies are in hydrological continuity with SAC ponds. The hydrology of the dune systems is not fully understood, but it is unlikely that a significant volume of water derives from surface freshwater bodies. It is assumed that the dune breeding ponds are fed by a combination of rain- and groundwater and it is therefore unlikely that treated sewage effluent from West Lancashire will reach the SAC (and in particular the locations of the breeding ponds). Overall, LSEs of the West Lancashire Local Plan on the Sefton Coast SAC regarding water quality can be excluded. The site is screened out from Appropriate Assessment in relation to this impact pathway.

Water Quantity, Level and Flow

Martin Mere SPA / Ramsar

- 5.31 The qualifying bird assemblage in the Martin Mere SPA / Ramsar is critically dependent on sufficient water levels for both roosting and foraging habitat. This particularly applies to duck species, which are visual predators that forage optimally in given water depths. For example, pintail require a water depth of 0.1-0.3m across 50% of the standing water area. Any deviations from this optimum range may impair their foraging success. Natural England's Site Improvement Plan highlights hydrological changes as the primary threat to the SPA / Ramsar, specifically due to the shrinkage of peat surrounding the site due to agricultural activity and land drainage. Active pump and drainage management is in operation on site to prevent water from draining into surrounding land, lowering the water level in its marshland habitat. Due to the need for supplying new households with potable water, the West Lancashire Local Plan may contribute to a drop in standing water level within the site.
- 5.32 West Lancashire lies in United Utilities' New Strategic Resource Zone, supplying a population of 7 million with an average volume of 1,697 million litres of potable water per day. However, this water company sources its water from reservoirs in the Pennines and the Lake District, Lake Vyrnwy in Wales and from boreholes and streams in the R. Dee catchment. None of these sources are hydrologically connected with the Martin Mere SPA / Ramsar. The company's Water Resources Management Plan 2019¹¹⁶ does not propose future resource options in the catchment of the site. This is in line with Amec Foster Wheeler's HRA of the WRMP¹¹⁷, which did not establish any links between the WRMP and the SPA / Ramsar. Therefore, LSEs of the West Lancashire Local Plan on the Martin Mere SPA / Ramsar regarding water quantity, level and flow can be excluded. The site is screened out from Appropriate Assessment in relation to this impact pathway.

Ribble & Alt Estuaries SPA / Ramsar

- 5.33 The wildfowl assemblage of the Ribble & Alt Estuaries SPA / Ramsar relies on sufficient water area / water depth for foraging, roosting and loafing. The intertidal nature of the site means that these habitat parameters will be determined by the interplay of sea- and freshwater. Increased abstraction from the catchments of the Rivers Ribble and Alt would have the potential to reduce the volume of freshwater supplied to the SPA / Ramsar. United Utilities, the company responsible for the potable water supply in north-western England, sources the vast majority of water from reservoirs in Cumbria.
- 5.34 A review of United Utilities' WRMP indicates that the Strategic Water Resource Zone (in which West Lancashire lies) is forecast to have a supply-demand balance that enters into a small deficit (approx. 3 Ml/d) towards the end of the planning period. However, as highlighted in the WRMP HRA, this deficit will primarily be addressed through demand management options such as leakage reductions and improvements to the water transport system. There are no suggestions for new resource options or increases in abstraction consents within the catchments of the R. Ribble and R. Alt. Therefore, LSEs of the West Lancashire Local Plan on the Ribble & Alt

¹¹⁶ Available at: <https://www.unitedutilities.com/corporate/about-us/our-future-plans/water-resources/water-resources-management-plan/> [Accessed on the 25/06/2021]

¹¹⁷ Available at: https://www.unitedutilities.com/globalassets/z_corporate-site/about-us-pdfs/wrmp-2019---2045/final-water-resources-management-plan-2019-habitats-regulations-assessment.pdf [Accessed on the 25/06/2021]

Estuaries SPA / Ramsar regarding water quantity, level and flow can be excluded. The site is screened out from Appropriate Assessment in relation to this impact pathway.

Mersey Narrows & North Wirral Foreshore SPA / Ramsar and Dee Estuary SAC

- 5.35 The Dee Estuary SAC and Mersey Narrows & North Wirral Foreshore SPA / Ramsar are considered together due to their partial overlap and the interdependency of their qualifying features. Both sites depend on sufficient freshwater input to maintain the salinity in aquatic habitats and stability in invertebrate communities. For example, the diversity of invertebrates decreases with increasing salinity and waders / waterfowl tend to be more abundant near estuarine freshwater inflows. Therefore, a decrease in the volume of freshwater to these sites (for example through the delivery of the West Lancashire Local Plan) has the potential to impact both SAC and SPA / Ramsar features.
- 5.36 United Utilities' WRMP highlights that the company manages some water abstractions in the R. Dee catchment, including boreholes and stream abstraction points. However, this HRA does not assess the existing consents regime, which would have been addressed in the Environment Agency's Review of Consents process and undergone previous HRA. A review of the WRMP (and its HRA) indicates that the company does not propose new abstractions in the R. Dee and R. Mersey catchments, both of which could influence freshwater volume in the above European sites. Therefore, LSEs of the West Lancashire Local Plan on the Dee Estuary SAC and the Mersey Narrows & North Wirral Foreshore SPA / Ramsar regarding water quantity, level and flow can be excluded. These sites are screened out from Appropriate Assessment in relation to this impact pathway.

Sefton Coast SAC

- 5.37 The Sefton Coast SAC encompasses two features that rely on sufficient freshwater input, including humid dune slacks (low-lying dunes that are seasonally flooded) and great-crested newts, the latter depending on dune pools for reproduction. These features are likely to be primarily supported by rainwater and high water tables, rather than being connected to the deeper aquifer. As such, the threat of potential water abstractions to the ecological integrity of the SAC is likely to be minimal. Furthermore, as highlighted in the previous sections, United Utilities' 2019 WRMP does not propose new resource options in the hydrological catchment of the SAC. Therefore, LSEs of the West Lancashire Local Plan on the Sefton Coast SAC regarding water quantity, level and flow can be excluded. The site is screened out from Appropriate Assessment in relation to this impact pathway.

Visual and Noise Disturbance (During Construction) – European Sites and Functionally Linked Habitat

Martin Mere SPA / Ramsar

- 5.38 Waterfowl is sensitive to human presence, including visual and auditory stimuli. One of the primary ways in which planning documents can cause visual and noise disturbance to waterfowl, is the construction of new developments (both residential and employment). Construction works may require workers to use loud machinery (e.g. impact piling) or simply be present in the proximity of a European site. The Martin Mere SPA / Ramsar lies centrally in West Lancashire to the north of Burscough. The site is surrounded by agricultural land, some of which may be allocated as greenfield sites in the West Lancashire Local Plan. Given that site allocations are not yet available, this impact pathway will need to be assessed further as the Plan progresses through its stages of development. Currently, LSEs of the West Lancashire Local Plan on the Martin Mere SPA / Ramsar regarding visual and noise disturbance cannot be excluded. The site is screened in for Appropriate Assessment.

Ribble & Alt Estuaries SPA / Ramsar

5.39 The Ribble & Alt Estuaries SPA / Ramsar is also sensitive to visual and noise disturbance from construction works. This site borders the northern edge of West Lancashire and is abutted by extensive tracts of farmland. If any of the greenfield sites were to be allocated in the West Lancashire Local Plan, there would be a risk of visual and noise disturbance to the qualifying bird population. Given that site allocations have not been confirmed, LSEs of the Plan on the Ribble & Alt Estuaries SPA / Ramsar regarding visual and noise disturbance cannot be excluded. The site is screened in for Appropriate Assessment.

Mersey Narrows & North Wirral Foreshore SPA / Ramsar

5.40 While the qualifying birds in the Mersey Narrows & North Wirral Foreshore SPA / Ramsar are sensitive to visual and noise disturbance, the site lies approx. 8.9km to the south-west of West Lancashire. This is too far for any disturbance to arise from construction processes. However, SPA / Ramsar birds that visit functionally linked habitats in West Lancashire may be disturbed by construction activities. However, all suitable greenfield sites will require assessment with regard to the Martin Mere SPA / Ramsar and the Ribble & Alt Estuaries SPA / Ramsar. This will ensure that the performance of functionally linked habitats for the wider network of SPAs / Ramsars is not impacted. Therefore, this site is screened out from Appropriate Assessment.

Coastal Squeeze

Ribble & Alt Estuaries SPA / Ramsar

5.41 The Ribble & Alt Estuaries SPA / Ramsar is the only coastal or estuarine site within West Lancashire, where development immediately inland from intertidal habitats would prevent these habitats from migrating landward to respond to climate change induced sea level rise. The estuarine coastal saltmarsh, essential supporting habitat for SPA / Ramsar bird species, abuts extensive tracts of agricultural in north West Lancashire. At the time of undertaking this screening exercise, site allocations were not available. Overall, LSEs of the West Lancashire Local Plan on the Ribble & Alt Estuaries SPA / Ramsar cannot be excluded. The site is screened in for Appropriate Assessment. The AA would entail an appraisal of sites allocated in the Plan in relation to SPA / Ramsar habitats, while also considering the adopted Shoreline Management Plan for the area.

Impacts from Tall Structures (e.g. Telecommunications Infrastructure or Wind Farms)

Collision Mortality

Martin Mere SPA / Ramsar, Ribble & Alt Estuaries SPA / Ramsar and Mersey Narrows & North Wirral Foreshore SPA / Ramsar

5.42 All SPAs / Ramsars along the coastline of north-western England are designated for mobile waders, waterfowl and seabirds. The likelihood of collision varies considerably between species, with body size, wing loading and manoeuvrability all contributing significantly to collision risk. Geese species, qualifying species of several European sites in the wider Liverpool City Region, are bulkier and slower, finding it more difficult to change direction abruptly. The north-west of England is an area of high bird activity with individuals routinely moving between marine, estuarine and inland sites, likely compounding the risk of collision mortality. Therefore, LSEs of the West Lancashire Local Plan on European sites regarding collision mortality cannot be excluded. These sites are screened in for Appropriate Assessment. The AA is likely to involve an assessment of the areas identified for wind energy development in relation to the qualifying bird species and their off-site foraging and roosting habitats.

Disturbance Displacement and Impacts on Flightlines

Martin Mere SPA / Ramsar and Ribble & Alt Estuaries SPA / Ramsar

5.43 Disturbance displacement is an impact pathway whereby tall structures result in the permanent or temporary displacement of sensitive bird species from optimum foraging habitats or preferred roosting sites. Such displacement may occur both within European sites or functionally linked supporting habitats. The risk of disturbance displacement would be highest if telecommunications infrastructure or wind farms were to be allocated in northern and central West Lancashire. Given that the geographic areas identified for renewable energies are not yet available, LSEs of the West Lancashire Local Plan on the Martin Mere SPA / Ramsar and the Ribble & Alt Estuaries SPA / Ramsar cannot be excluded. These sites are screened in for Appropriate Assessment. An AA for this impact pathway is likely to encompass an appraisal of the areas allocated for alternative energy or telecommunications development (where available) and disturbance displacement sensitivities of different qualifying SPA / Ramsar species.

In-Combination Assessment

5.44 It is a requirement of the Habitats Regulations to not only assess the impacts of development plans not solely in isolation, but also in-combination with other plans and projects. This is not relevant for impact pathways for which a realistic direct link cannot be established, but it is designed to capture impacts that may be too small to be relevant individually. The screening table in Appendix 2 provides an assessment of LSEs both alone and in-combination. Given the relatively long distance of West Lancashire Borough to most European sites, it is considered that some policies will primarily present a potential threat to site integrity in-combination. The following are policies that are considered to have an inconsequential impact alone, but may result in cumulative effects when considered in-combination with other plans and projects:

- Policy – Delivering Sustainable Development
- Policy – Preserving and enhancing the Borough’s Landscape and Land Resources
- Policy – Gypsies and Travellers and Travelling Showpeople
- Policy – Accommodation for Temporary Agricultural Workers
- Policy – Adapting our Town and Local Centres

5.45 However, the Martin Mere SPA / Ramsar lies in the heart of the borough and the allocation of large strategic housing or employment sites, tall telecommunications infrastructure and wind energy schemes in the vicinity of the site may lead to LSEs alone, particularly in relation to impact pathways such as recreational pressure and loss of functionally linked habitat. Therefore, the following policies have been also screened in for Appropriate Assessment alone:

- Policy – Housing and Employment Land Requirements
- Policy – Strategic Development Sites
- Policy – Where housing can go
- Policy – Providing and Managing Employment Areas
- Policy – Communications and Digital Connectivity Infrastructure
- Policy – Low Carbon and Renewable Energy

5.46 It is to be noted that the detail of any Appropriate Assessment (AA) is unlikely to materially differ between an assessment alone or in-combination. This is because the evidence base for an AA inherently takes cumulative effects into account. For example, Air Quality Impact Assessments (AQIAs) consider the future traffic projections in all adjoining authorities. Visitors surveys, which are used to delineate core recreation catchments, represent a multiple authority approach in their visitor counts and interviews. The in-combination approach is critical because residents from authorities other than West Lancashire (e.g. Sefton, Liverpool City and others) will also each contribute a portion to relevant impact pathways. The Reg. 19 HRA of the West Lancashire Local

Plan will consider the development plans and corresponding HRAs of neighbouring authorities wherever relevant.

6. Screening Conclusions

Impact Pathway: Recreational Pressure

- 6.1 The HRA assessed the potential implications of the West Lancashire Local Plan regarding recreational pressure. Given that the Plan may allocate new residential housing and gypsy and traveller sites within close proximity to several European sites, it was concluded that LSEs on the Ribble & Alt Estuaries SPA / Ramsar and the Sefton Coast SAC cannot be excluded. The Appropriate Assessment (AA) for this impact pathway is likely to encompass a detailed consideration of visitor survey results, the distribution of residential growth in West Lancashire and appraising the Recreation Mitigation and Avoidance Strategy (RMAS) emerging in the wider Liverpool City region.

Impact Pathway: Atmospheric Pollution

- 6.2 The population and employment space increase will lead to an increase in the volume of commuter traffic within the authority. Sefton is the major origin and destination for commuter traffic associated with West Lancashire and the A565 runs within 200m of sensitive dune habitat in the Sefton Coast SAC to the south of Southport. However, it is considered that the A565 is not a major route used by commuter traffic to and from West Lancashire, as there are several other routes connecting to Sefton that avoid this stretch of road. Therefore, there will be no LSEs of the West Lancashire Local Plan on the Sefton Coast SAC regarding atmospheric pollution. The site is screened out from Appropriate Assessment regarding this impact pathway.

Impact Pathway: Loss of Functionally Linked Habitat

- 6.3 The Borough of West Lancashire, particularly its northern and western areas surrounding the Martin Mere SPA / Ramsar and the Ribble & Alt Estuaries SPA / Ramsar, is relatively rural in nature. Both European sites are designated for mobile bird species that rely on functionally linked habitats (e.g. agricultural fields, wet grassland) for foraging and building up their energy reserves. The potential for losing supporting habitats depends on the type, size and habitat of sites allocated in the West Lancashire Local Plan. The AA for this impact pathway is likely to encompass a detailed appraisal of allocated sites, bird records and, potentially, bespoke overwintering bird surveys undertaken at the plan-level.

Impact Pathway: Water Quality

- 6.4 Development outlined in the West Lancashire Local Plan may be associated with negative water quality impacts in one of two ways: The increase in the volume of treated sewage effluent associated with new housing and water surface run-off arising from impermeable surfaces. LSEs of the Plan regarding water quality could not be excluded in relation to the Martin Mere SPA / Ramsar and the Ribble & Alt Estuaries SPA / Ramsar, both of which depend on sufficient water quality. Potential water quality impacts will in the main part be determined by the distribution of growth, the discharge location and permitted headroom of relevant WwTWS and the distance to ecological receptors. The AA would also assess site locations with regard to their potential of causing water quality impacts via surface run-off.

Impact Pathway: Water Quantity, Level and Flow

- 6.5 All European sites within 15km of the West Lancashire Borough boundary depending on sufficient freshwater quantity or level were screened for LSEs. However, it was determined that the West Lancashire Local Plan would not impact the water levels in any of the sites. United Utilities, the company for the potable water supply in West Lancashire, mainly uses water sources in Cumbria and Wales, none of which are in hydrological connection to the relevant European sites. Furthermore, it was determined that the company's WRMP does not encompass future resource options that involve the catchments of these designated sites.

Impact Pathway: Visual and Noise Disturbance (During Construction) – European Sites and Functionally Linked Habitats

- 6.6 Waders, waterfowl and seabirds in the Martin Mere SPA / Ramsar and the Ribble & Alt Estuaries SPA / Ramsar are sensitive to visual and noise disturbance from construction works. This applies to European sites themselves as well as functionally linked habitats, because construction disturbance may impede the ability of birds to forage / roost in key supporting sites. The AA for this impact pathway will assess individual site allocations (which are not yet available) in their geographic relation to the SPAs / Ramsars. Sites beyond 300m are unlikely to result in visual and noise disturbance, but mitigation measures are likely to be required where allocations fall within this buffer zone.

Impact Pathway: Coastal Squeeze

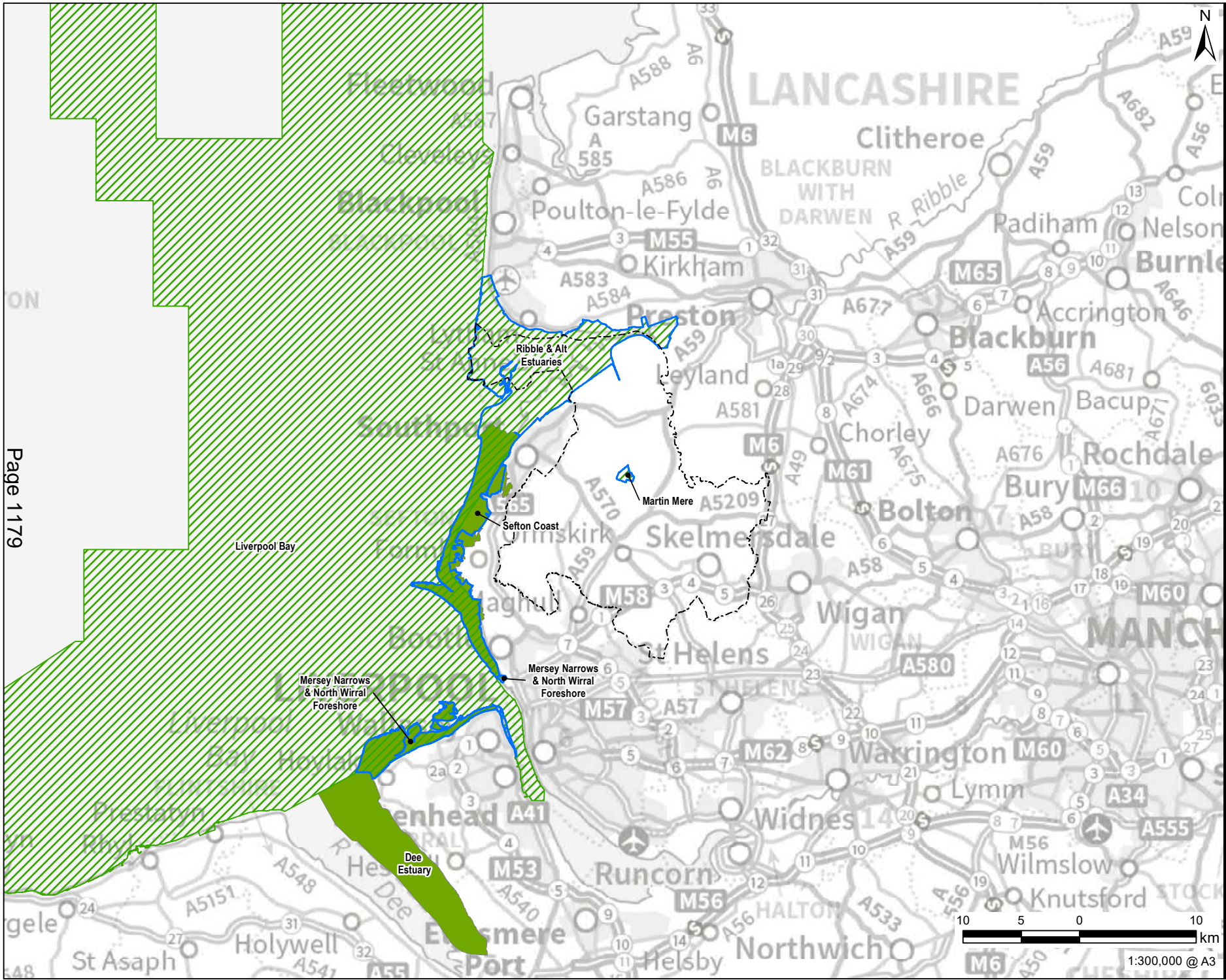
- 6.7 The Ribble & Alt Estuaries SPA / Ramsar in the northern part of West Lancashire is abutted by agricultural land. Allocating any of these agricultural parcels as greenfield sites in the Plan may exacerbate coastal squeeze and could diminish the area of habitat available to SPA / Ramsar birds. This impact pathway will need to be considered further once site allocations are available and assessed in the context of the relevant Shoreline Management Plan.

Impact Pathway: Impacts from Tall Structures (Collision Mortality, Disturbance Displacement and Impacts on Flightlines)

- 6.8 The West Lancashire Local Plan supports the delivery of essential telecommunications infrastructure and wind energy developments, both of which are likely to involve the construction of tall buildings. Any sites delivered across West Lancashire, but particularly in its central, northern and western areas, will be associated with risks of collision mortality, disturbance displacement and impacts of flightlines. The AA for this impact pathway would likely assess the sensitivity of individual species to each of these issues.

7. Appendices

Appendix 1: Map of the European sites within 15km of the West Lancashire Borough boundary.



Appendix 2: Screening of Plan Policies

Appendix 2 presents an HRA screening assessment of all preferred policies considered for the West Lancashire Local Plan, alone and ‘in-combination’ with other plans. Where policies have been coloured green in the ‘Test of Likely Significant Effect (LSEs)’ column, this indicates that the policy is not associated with linking impact pathways to European sites and has been screened out from further consideration. Where policies are coloured orange, this indicates that the policy provides for potential impact pathways linking to European sites and has been screened in for Appropriate Assessment.

Policy number/ name	Policy detail	Test of Likely Significant Effects (LSEs) Alone	Test of LSEs In-Combination
Strategic Policies			
Delivering Sustainable Development	<p>This policy will set the settlement hierarchy for West Lancashire and support a presumption in favour of sustainable development in line with the National Planning Policy Framework. Identification of the hierarchy (with most growth directed to settlements at the top of the hierarchy) will be based on the Sustainable Settlement Study 2021.</p> <p><u>Comment:</u> The alternative policy approach would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded.</p> <p>Given the distances to European sites, it is considered unlikely that this policy would lead to LSEs alone. Impact pathways in the north-west are an in-combination issue (see column to the right).</p>	<p>LSEs of this policy on European sites in-combination cannot be excluded.</p> <p>This policy seeks to deliver sustainable development across the borough in line with the NPPF. While sustainable development is positive, the policy will specify the location of residential and economic development.</p> <p>Proximity to European sites is a key determinant of the magnitude of impact pathways. For example, regarding recreational pressure, residents living closer to designated sites, are more likely to visit for outdoor activities.</p> <p>The following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Recreational pressure • Loss of functionally linked habitat • Atmospheric pollution

			<ul style="list-style-type: none"> • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction) • Coastal squeeze <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
<p>Housing and Employment Land Requirements</p>	<p>This policy will detail the quantum of housing and employment floorspace to be delivered in West Lancashire. It will be written once the Housing and Employment Needs Assessment (HEDNA) is complete and requirements have been agreed upon by members</p> <p><u>Comment:</u> Five different spatial distribution options for housing and employment land requirements have been proposed. However, all options are determined to lead to LSEs and would need to be taken forward to Appropriate Assessment.</p>	<p>LSEs of this policy on European sites alone cannot be excluded.</p> <p>Depending on the quantum and location of housing and employment development, this policy could lead to LSEs alone, particularly if delivered in close proximity to the Martin Mere SPA / Ramsar. Please see column to the right for potential impact pathways.</p> <p>Overall, this policy would be screened in for Appropriate Assessment.</p>	<p>LSEs of this policy on European sites in combination cannot be excluded.</p> <p>This policy will set the amount of housing and employment land to be delivered under the Local Plan. The quantum of development is a key factor in determining the potential magnitude of impact pathways.</p> <p>For example, developments will need to be connected to sewerage infrastructure and result in increased volumes of treated sewage effluent being discharged from Wastewater Treatment Works. Such effluent has the potential to result in water quality impacts on freshwater and marine sites (through phosphorus and nitrogen respectively).</p> <p>The following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Recreational pressure

			<ul style="list-style-type: none"> • Loss of functionally linked habitat • Atmospheric pollution • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction) • Coastal squeeze <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
Climate Change and Environmental Sustainability	<p>The preferred policy approach would introduce a new strategic policy covering climate change and environmental sustainability. Development proposals would likely need to achieve net-zero efficiency, while low-carbon and renewable energy generation would also be supported. A shift away from private car travel to active and sustainable travel modes would be encouraged.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome. Not including this policy would imply that no screening would need to be undertaken.</p>	LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy addresses climate change and advocates low-carbon / renewable energies.</p> <p>Therefore, it contains provisions that will be positive for reducing atmospheric pollution, such as the support of active / sustainable transport modes. There are no impact pathways linking to European sites.</p> <p>Overall, this policy would be screened out from Appropriate Assessment.</p>
Settlement Boundaries, Protected Land and Green Belt	This policy will stipulate the permitted development within and outside of settlement boundaries. For example, within settlement boundaries development will be permitted, with preference given to brownfield redevelopment. Outside settlement boundaries, land will be designated as Protected Land or Green Belt, with development permissions following national policy.	LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy identifies the type of development that will be permitted within and outside of settlement boundaries.</p>

	<p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>		<p>It contains the positive provision that planning applications will focus on the redevelopment of brownfield sites, rather than utilising greenfield sites. Therefore, any potential loss of functionally linked habitats will be less likely.</p> <p>Overall, this policy would be screened out from Appropriate Assessment.</p>
<p>Strategic Development Sites</p>	<p>As part of the Local Plan some strategic development sites may come forward, in addition to smaller individual sites addressed in housing / employment land allocation policies.</p> <p><u>Comment:</u> Strategic development sites have not yet been identified and no alternative sites have been proposed. Therefore, all Strategic Development Sites will need to be appropriately assessed at the next stage of the Plan.</p>	<p>LSEs of this policy on European sites alone cannot be excluded.</p> <p>Depending on the size and location of strategic development sites, this policy could lead to LSEs alone, particularly if delivered in close proximity to the Martin Mere SPA / Ramsar. The Strategic Development Sites will be assessed at the next Plan stage. Please see column to the right for potential impact pathways.</p> <p>Overall, this policy would be screened in for Appropriate Assessment.</p>	<p>LSEs of this policy on European sites cannot be excluded.</p> <p>This policy identified that some strategic development sites may come forward under the Local Plan. Such sites are likely to encompass larger quanta of residential and / or employment growth, and thus will require special attention in the HRA process. The Strategic Development Sites will be assessed at the next Plan stage.</p> <p>The following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Recreational pressure • Loss of functionally linked habitat • Atmospheric pollution • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction)

			<ul style="list-style-type: none"> Coastal squeeze <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
Environment and Health Policies			
Page 1184	Preserving and Enhancing the Borough's Nature	<p>This policy will continue the approach taken in the adopted West Lancashire Local Plan. Primarily, it will protect and safeguard all sites of international, national and local importance. Furthermore, development will need to ensure that no harm to nature conservation interests will occur and appropriate mitigation measures are secured.</p> <p>All biodiversity resource in the plan area will be conserved or, where possible, enhanced. Biodiversity Net Gain (BNG) will be required for all development sites, securing at least 10% BNG on site or on designated sites.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p> <p>There are no LSEs of this policy on European sites in-combination.</p> <p>This is a policy that seeks to protect and safeguard all nature sites of international, national and local importance. It also obliges developers not to cause harm to nature conservation interests and provide for mitigation measures, where potential impacts cannot be excluded.</p> <p>Therefore, this policy provides essential protection to European sites and is not linked to any impact pathways.</p> <p>Overall, this policy would be screened out from Appropriate Assessment.</p>
	Preserving and Enhancing the Borough's Landscape and Land Resources	<p>This policy continues the approach of the adopted West Lancashire Local Plan, preserving and enhancing the borough's natural environment, including land resources, coastal zone and landscape character. The policy restricts new development in key zones, such as high quality agricultural land and limits development in Coastal Zones to navigation, recreation, tourism, flood protection, fisheries, nature conservation and agriculture. The North West Marine Plan developed by the Marine Management Organisation will also be considered.</p>	<p>LSEs of this policy on European sites alone can be excluded.</p> <p>Given the distances to European sites, it is considered unlikely that this policy would lead to LSEs alone. Impact pathways in the north-west are an in-combination issue (see column to the right).</p>

	<p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>		<p>While preventing residential and employment development in coastal areas is positive, development projects in relation to flood protection or tourism could still lead to impact pathways, such as surface water run-off, coastal squeeze and visual / noise disturbance.</p> <p>The following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Recreational pressure • Loss of functionally linked habitat • Atmospheric pollution • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction) • Coastal squeeze <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
<p>Managing Flood Risk and Water Resources</p>	<p>This policy will intend to ensure that development will not result in unacceptable flood risk or drainage problems, primarily by prohibiting proposals in areas of greatest flood risk. Furthermore, developments will be required not to dispose surface water to public foul sewers. Sustainable Drainage Systems (SuDS) should be delivered where possible. The policy will also comprise a section on water quality, water use and resource protection.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This positive policy protects the water quality and water quantity in West Lancashire's waterbodies. Avoiding areas of highest flood risk and installing SuDS are important mitigation measures to prevent adverse water quality effects via surface run-off during flooding events. AECOM considers that this policy is key for the delivery of the</p>

			<p>Local Plan, given that the borough is adjoined by several estuarine European sites.</p> <p>This policy provides essential protection to European sites and is not linked to any impact pathways.</p> <p>Overall, this policy would be screened out from Appropriate Assessment.</p>
Contamination and Pollution	<p>Broadly, this policy aims to minimize contamination and pollution in West Lancashire, especially with regard to human health. Furthermore, proposals should seek to remediate and restore contaminated land. Developers must assess the nature, degree and extent of contamination by carrying out preliminary investigations. Developments that are likely to result in unacceptable levels of pollution or contamination will not be supported.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome. Not including this policy would imply that no screening would need to be undertaken.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>An aim of minimizing contamination and pollution is inherently positive. However, the focus of this policy is clearly on human health, which has no direct relevance to European sites. Therefore, there are no linking impact pathways for nature conservation interests.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
Air Quality	<p>New developments should be designed to minimise negative air quality impacts and look for opportunities to improve air quality, such as by encouraging a reduction in the use of motor vehicles and supporting renewable energy sources.</p> <p><u>Comment:</u> Not including this policy would imply that no screening would need to be undertaken.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This positive policy aims at improving the air quality in West Lancashire. It obliges developers to employ beneficial measures, such as by promoting green / active travel modes and supporting renewable energy developments.</p>

			<p>Air pollution via atmospheric nitrogen deposition is a key threat to the supporting habitats of many overwintering bird species. For example, dune and saltmarsh habitats support qualifying species in the Ribble & Alt Estuaries SPA / Ramsar. Nitrogen deposition to these habitats can lead to changes in the botanical community composition and may threaten the ability to support SPA / Ramsar bird populations.</p> <p>Supporting sustainable transport modes is a key mitigation approach adopted in many other authorities. This approach is likely to help reduce atmospheric nitrogen deposition to sensitive habitats.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
<p>Green Infrastructure and Open Space</p>	<p>Approach 1: An overarching Green Infrastructure (GI) policy that protects and enhances the GI network, while also improving cycling and walking infrastructure. This policy would represent a framework for more detailed policies.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p> <p>Approach 2: This would encompass both open spaces and built leisure facilities. It would protect from the loss of such uses, specifying in which geographic locations,</p>	<p>LSEs of these policy approaches (and their proposed alternatives) on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of these policy approaches (and their proposed alternatives) on European sites in-combination.</p> <p>These policy approaches seek to protect and improve the GI network, open spaces and built leisure facilities. Approach 2 would also set open space requirements in new residential developments. Approach 4 extends protection to trees, woodlands and hedgerows.</p>

	<p>except under certain circumstances. Furthermore, it would provide the open spaces standards in new residential development. Play pitch requirements would also be considered by referring to the West Lancashire Playing Pitch Strategy.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p> <p>Approach 3: This would be a companion policy to Approach 2, identifying the types of residential developments the open space standards would apply to. It would encompass a table of costs for providing and maintaining different types of open spaces, in the case that this cannot be provided on site.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p> <p>Approach 4: Provides protection and enhancement of existing trees, woodlands and hedgerows. It would set out how such features would need to be considered in relation to planning applications and what type of compensation may be required. Furthermore, the protection of ancient woodland and veteran trees would be provided.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>		<p>All policy approaches are positive for the environment and maintain a network of green, open spaces that are publicly accessible. Preserving and / or enhancing open space is a key mitigation approach for recreational pressure, because this helps absorb recreation locally. West Lancashire is adjoined by estuarine sites designated for overwintering birds, which are sensitive to disturbance. There are no linking impact pathways for nature conservation interests.</p> <p>All policy approaches would be screened out from Appropriate Assessment.</p>
<p>Healthy Eating and Drinking</p>	<p>This policy promotes healthy eating and drinking, supported by a Healthy Eating and Drinking Supplementary Planning Document. All drinking establishments and hot food takeaways would need to be supported by a Health Impact Assessment (HIA). Criteria</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p>

	<p>for the locations of these uses in relation to schools and colleges would also be included.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome. Not including this policy would imply that no screening would need to be undertaken.</p>		<p>The policy aims to support healthy eating and drinking across West Lancashire with regard to drinking establishments and hot food takeaways. While this is a positive aim, it has no relevance for and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
<p>Housing and Communities Policies</p>			
<p>Where housing can go</p>	<p>Preferred Approach 1: A policy that would link to Strategic Development Policy (Delivering Sustainable Development), but specifically focusing on housing development. Housing would be allowed in all non-Green Belt settlements. In the Green Belt housing development would only be permitted in line with national policy on Rural Exception Sites.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p> <p>Preferred Approach 1A: An extension to this policy would detail wording in relation to specific sites allocated for housing, with additional text detailing the requirements on each site.</p> <p><u>Comment:</u> Housing sites are not yet available and cannot be screened out at this stage. These will be assessed at the next Plan stage.</p>	<p>LSEs of these policies approaches on European sites alone cannot be excluded.</p> <p>Depending on the location of housing, both policies approaches could lead to LSEs alone, particularly if large numbers of dwellings were to be delivered in close proximity to the Martin Mere SPA / Ramsar. Please see column to the right for potential impact pathways.</p> <p>Overall, these policies would be screened in for Appropriate Assessment.</p>	<p>LSEs of these policy approaches on European sites cannot be excluded in-combination.</p> <p>Together these policy approaches will determine where housing will be delivered in West Lancashire. Housing will be permitted in all non-Green Belt settlements, while restrictions apply in the Green Belt. Furthermore, approach 1A will also provide detail on all individual allocations, most likely the number of homes and on-site requirements to be delivered.</p> <p>Both the quanta and geographic locations of housing allocations are important determinants of likely impacts on European sites. For example, a large number of homes delivered close to a European site will pose a greater threat regarding recreational pressure than a smaller site further away. Each allocation will require assessment</p>

			<p>individually as to whether Likely Significant Effects can be excluded.</p> <p>The following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Recreational pressure • Loss of functionally linked habitat • Atmospheric pollution • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction) • Coastal squeeze <p>Overall, these policy approaches would be screened in for Appropriate Assessment.</p>
<p>Using land efficiently</p>	<p>This policy encourages residential development to be prioritised on brownfield sites rather than greenfield sites. A minimum density of 30 dwellings per hectare will be required, with a higher density of 40-50 dwellings to be delivered on urban sites.</p> <p><u>Comment:</u> The alternative policy approaches regarding preference for brownfield land development would not have changed the LSEs screening outcome. However, not prioritising brownfield sites for development would have removed some of the ‘in-built’ mitigation in the Plan.</p> <p><u>Comment:</u> The alternative policy approaches regarding housing density would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy approach on European sites in-combination.</p> <p>The overall aim of this policy is to set density requirements for new residential developments. Generally, housing density is not a parameter that has a direct relevance to European sites.</p> <p>However, it is considered that directing new homes towards brownfield sites is positive, because this minimises the risk of losing functionally linked habitat for birds. Furthermore, from an HRA</p>

			<p>perspective, requiring higher housing densities would be beneficial as this would reduce the amount of land needed to deliver the Local Plan. There are no linking impact pathways for European sites.</p> <p>All policy options would be screened out from Appropriate Assessment.</p>
Dwelling Sizes	<p>This policy sets the required mix of dwelling sizes in new developments, which will be based on the Council's evidence base. Specifically, the policy will identify the proportion of dwellings with different numbers of bedrooms.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy sets the proportion of different dwelling sizes that will be delivered across West Lancashire. However, dwelling size is not a parameter that has implications to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
Affordable Housing	<p>This policy supports the delivery of 100% affordable housing schemes in West Lancashire. Furthermore, in housing sites over 10 dwellings in size, a proportion of affordable homes will be required. Different types of affordable homes (e.g. rented, owned and part-owned) will be supported.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy identifies the approach to affordable housing adopted in West Lancashire. For example, it details that 100% affordable schemes will be supported.</p> <p>However, the delivery of affordable homes in Local Plans has no bearing on and linking impact pathways to European sites.</p>

			This policy would be screened out from Appropriate Assessment.
Housing for Older People	<p>This policy supports the provision of accommodation for older people in settlements. It aims at delivering independent living and mixed communities. This will require that all new properties meet accessibility and adaptability standards in line with the Building Regulation M4(2) and (3). This policy will also support care home accommodation.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome. Not including this policy would imply that no screening would need to be undertaken.</p>	LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy supports the delivery of homes for older people across West Lancashire, including independent living arrangements, mixed communities and care homes.</p> <p>However, the delivery of accessible / adaptable homes in Local Plans has no bearing on and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
Custom and Self-Build Housing	<p>The policy takes a more positive approach towards Custom and Self-Build Housing than in previous West Lancashire Local Plans. Large housing sites will be required to provide a proportion of plots for Custom and Self-Build Housing. Such plots would be serviced and offered at a reasonable price.</p> <p>Furthermore, several small- to medium-sized sites may be reserved solely for Custom and Self-Build Housing. Such sites may also be permitted on rural exception sites.</p> <p><u>Comment:</u> Not including this policy would imply that no screening would need to be undertaken.</p>	LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy supports the delivery of custom and self-build housing in large housing sites. Furthermore, a few small- to medium-sized sites may provide 100% custom and self-build homes.</p> <p>However, the delivery of custom and self-build housing has no bearing on and linking impact pathways to European sites.</p>

			This policy would be screened out from Appropriate Assessment.
Accommodation for Students	<p>This policy continues West Lancashire's approach to student Housing in Multiple Occupation (HMOs). A limit on the proportion of HMOs that can be delivered in specific streets will be set. Student accommodation will be permitted on the University campus (in non-Green Belt areas) as well as on a small number of sites near Ormskirk town centre.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy restricts the provision of student accommodations HMOs to the University campus and a small number of sites around Ormskirk town centre.</p> <p>However, the delivery of student accommodation has no direct bearing on and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
Caravan and Houseboat Dwellers	<p>The current evidence base indicates that there is no significant increase in demand for caravan and houseboat accommodation across West Lancashire. Therefore, no new site allocations or Green Belt release will be required for these uses. The policy approach will continue to support the rural economy and assess expansion or enhancement regarding these uses on a case-by-case.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy identifies that no further site allocations and Green Belt release will be required regarding caravan and houseboat accommodation uses.</p> <p>Given that no new allocations will be delivered for these uses, this policy has no direct bearing on and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>

<p>Gypsies and Travellers and Travelling Showpeople</p>	<p>This policy will allocate some of the sites where travellers are currently residing. Furthermore, some additional sites on suitable land would be allocated to meet any residual gypsy and traveller demand. Parts of new site allocations may deliver further gypsy and traveller pitches.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded.</p> <p>Given the relatively small quantum of residential growth likely to be delivered as gypsy and traveller sites, it is considered unlikely that this policy would lead to LSEs alone. Many impact pathways in the north-west are an in-combination issue (see column to the right).</p>	<p>LSEs of this policy on European sites cannot be excluded in-combination.</p> <p>This policy will allocate new gypsy and traveller sites, which would entail an increase in the local population. Any site allocations that come forward would have to be assessed for Likely Significant Effects and adverse impacts in their own right.</p> <p>As for housing allocations, the following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Recreational pressure • Loss of functionally linked habitat • Atmospheric pollution • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction) • Coastal squeeze <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
<p>Accommodation for Temporary Agricultural Workers</p>	<p>This policy will follow the current approach taken in the adopted West Lancashire Local Plan. The re-use of existing buildings in settlements and the countryside for agricultural workers' accommodation will be permitted. Non-permanent accommodation will be supported provided that any impacts are minimized.</p>	<p>LSEs of this policy on European sites alone can be excluded.</p> <p>Given the relatively small quantum of residential growth likely to be delivered as accommodation for temporary agricultural workers (and</p>	<p>LSEs of this policy on European sites cannot be excluded in-combination.</p> <p>This policy supports the re-use of existing buildings and the delivery of non-permanent accommodation for agricultural workers.</p>

	<p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome. Not including this policy would imply that no screening would need to be undertaken.</p>	<p>such accommodation not being permanent), it is considered unlikely that this policy would lead to LSEs alone. Many impact pathways in the north-west are an in-combination issue (see column to the right).</p>	<p>This policy supports the housing of rural workers in temporary accommodation. As such, the policy may temporarily increase the local population in the vicinity of European sites. The following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Recreational pressure • Loss of functionally linked habitat • Atmospheric pollution • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction) • Coastal squeeze <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
<p>General Policies</p>			
<p>Place-Making</p>	<p>This policy identifies a set of good place-making principles that will apply to both greenfield sites and developments in built-up areas. Planning applications would need to achieve good design, improve general health and wellbeing and enhance the natural environment.</p> <p>A strong focus will be placed on the health of residents with most sensitive uses being directed away from possible threats to health (e.g. busy roads). Active travel modes (e.g. walking and cycling) will be prioritized by encouraging modal shifts for short journeys. Furthermore, natural places (e.g. green spaces, gardens, trees and</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy promotes principles of good place-making in West Lancashire, including the prioritisation of active travel modes and the maximisation of natural spaces (e.g. green spaces, trees, water features).</p> <p>These place-making features are all likely to have positive impacts for</p>

	<p>water features) should be maximized and within easy reach for everyone.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome. Not including this policy would imply that no screening would need to be undertaken.</p>		<p>European sites. For example, an increase in the number of walking and cycling journeys would have beneficial effects on sites that are sensitive to atmospheric pollution. The provision of green spaces within easy walking distance is an established tool for mitigating recreational pressure in European sites.</p> <p>This policy has no linking impact pathways to European sites.</p> <p>It would be screened out from Appropriate Assessment.</p>
<p>Preserving and Utilising our Heritage</p>	<p>This policy preserves and enhances West Lancashire's cultural and heritage assets in line with national policy requirements. The borough has a long-standing history, which is documented through the wide range of heritage assets across West Lancashire. One means to achieve this is by promoting high-quality design and appropriate uses, which are sensitive to the architecture, design, scale and use of materials of nearby heritage assets.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome. Not including this policy would imply that no screening would need to be undertaken.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy protects and enhances West Lancashire's heritage assets by promoting high-quality design and appropriate uses in key locations.</p> <p>However, the protection of heritage assets has no bearing on and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
<p>Community Facilities</p>	<p>This policy aims at letting the market and community decide on the community facilities to be delivered. However, it will prevent the unnecessary loss of such services, where a need is identified. New community</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p>

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	<p>facilities will be supported in sustainable locations with good accessibility.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>		<p>This policy protects against the loss of community facilities and supports new facilities in sustainable locations.</p> <p>However, the provision of community facilities generally has no bearing on and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
Economy and Employment			
<p>Providing and Managing Employment Areas</p>	<p>This policy will identify the amount and geographic location of new employment land to be provided in West Lancashire. It will consider the factors requiring consideration for employment development. Furthermore, existing Strategic Employment Sites are identified and protected.</p> <p>The number of existing employment sites protected for traditional uses (e.g. offices, research, light industry, storage and distribution) will be reduced. Within the core employment areas, permitted changes of use will also be restricted. Outside core employment areas, a wider range of commercial uses (e.g. shops, financial and professional services, food and drink, health centres, nurseries and gyms) will be supported.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone cannot be excluded.</p> <p>Depending on the location of employment areas, this policy could lead to LSEs alone, particularly if new employment sites were to be delivered in close proximity to the Martin Mere SPA / Ramsar. Please see column to the right for potential impact pathways.</p> <p>Overall, this policy would be screened in for Appropriate Assessment.</p>	<p>LSEs of this policy on European sites cannot be excluded in-combination.</p> <p>This policy identifies the amount and location of employment land to be provided across West Lancashire. Furthermore, it will also set the factors that new economic development would need to consider.</p> <p>Both the quantum and location of new employment land may have impacts on European sites. For example, the allocation of a significant amount of employment land could lead to an increase in commuter traffic along major routes within 200m of European sites. The magnitude of this impact pathway is likely to depend on various factors, such the likely importance of employment sites to residents of adjoining authorities.</p>

			<p>The following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Atmospheric pollution • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction) • Coastal squeeze <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
<p>Developing the Rural and Visitor Economy</p>	<p>This policy protects the countryside from new economic development due to its Green Belt designation and quality of agricultural land, except for specific rural development site allocations. In contrast, existing employment uses in rural areas will be protected, provided they are viable. Provided they are proportionate in scale to their rural setting, the expansion of existing rural businesses will be supported.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone cannot be excluded.</p> <p>Depending on the location of rural employment sites, this policy could lead to LSEs alone, particularly if new development was to be delivered in close proximity to the Martin Mere SPA / Ramsar. Please see column to the right for potential impact pathways.</p> <p>Overall, this policy would be screened in for Appropriate Assessment.</p>	<p>LSEs of this policy on European sites cannot be excluded in-combination.</p> <p>This policy protects existing employment uses in rural areas, while limiting the amount of new development that can be delivered there. However, it also allows for the expansion of rural businesses. This could lead to an increase in the number of car-based journeys to these areas, although these expansions are likely to be relatively small. The potential impacts of economic development are also assessed as part of the previous policy.</p> <p>The following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Atmospheric pollution

			<ul style="list-style-type: none"> • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction) • Coastal squeeze <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
<p>Adapting our Town and Local Centres</p>	<p>This policy provides the growth strategies for town and local centres, including specific supporting policies for the Burscough, Ormskirk and Skelmersdale town centres. The overarching policy content will specify the hierarchy of centres (thereby indirectly the order of preference for new development) and any required impact assessments. Any proposals would need to be of an appropriate scale in relation to the relevant town centre. Skelmersdale town centre is a particular focus for regeneration. Potential new town centre uses would be assessed against their contribution towards the overall commercial activity in the town centre.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded.</p> <p>Given the distances of most town and local centres to European sites, particularly the Martin Mere SPA / Ramsar, it is considered unlikely that this policy would lead to LSEs alone. Impact pathways in the north-west are an in-combination issue (see column to the right).</p>	<p>LSEs of this policy on European sites cannot be excluded in-combination.</p> <p>This policy specifies the hierarchy of town and local centres, which will dictate the geographic distribution and quantum of development to be delivered across West Lancashire.</p> <p>Both the quantum and location of newly allocated land for non-residential uses may have impacts on European sites. For example, the allocation of specific quanta of commercial and employment uses could lead to an increase in commuter traffic along major routes within 200m of European sites. The magnitude of this impact pathway is likely to depend on various factors, such the likely importance of employment sites to residents of adjoining authorities.</p> <p>The following linking impact pathways to European sites are present:</p>

			<ul style="list-style-type: none"> • Loss of functionally linked habitat • Atmospheric pollution • Water quality • Water quantity, level and flow • Visual and noise disturbance (during and post construction) • Coastal squeeze <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
<p>Skills and Education: The future development of Edge Hill University</p>	<p>This policy supports the continued development and improvement of Edge Hill University campus, including the delivery of student accommodation. Any development beyond the campus boundary will require Travel Plans and parking strategies to improve access and minimize impacts on traffic. A companion policy (discussed above) would address the issue of off-site student accommodation (HMOs).</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome. While it is noted that an off-site alternative location for student accommodation is proposed under alternative policy 3, this is also unlikely to result in LSEs. Not including this policy would imply that no screening would need to be undertaken.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy supports the development and potential expansion of the Edge Hill University campus, including the delivery of off-site student accommodation. As such, the policy is relatively specific as to where a potential population increase would occur (Ormskirk), except under alternative policy 3.</p> <p>While new residential accommodation is associated with various impact pathways, it is considered that any expansion of student accommodation is likely to be small-scale. Furthermore, the overall population increase would be adequately assessed in the housing policies detailed above.</p>

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			<p>Overall, it is considered that this policy has no direct bearing on and linking impact pathways to European sites.</p> <p>It would be screened out from Appropriate Assessment.</p>
Skills and Training	<p>This policy promotes the use of local people and businesses during the construction and implementation of major development proposals. Planning applicants for large development sites will need to provide an employment and skills plan, detailing opportunities and training for local employees.</p> <p><u>Comment:</u> Not including this policy would imply that no screening would need to be undertaken.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy supports the use and training of local employees in large development applications. While positive for the local economy, this policy has no relevance for and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
Transport and Infrastructure			
Transport Networks	<p>This policy sets out a list of proposed transport infrastructure improvement schemes across West Lancashire that will be obligatory. Developers will be required to maximise linkage to transport networks, especially via walking and cycling links. There will be strong linkage to the good place-making policy.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy promotes improvements to West Lancashire's transport infrastructure through a series of schemes. Furthermore, developments will need to provide good walking and cycling links to public transport.</p> <p>Improvements to the public transport network and active travel modes are positive for European sites that are sensitive to atmospheric pollution. They</p>

			<p>could help reduce reliance on fossil-fuelled cars, ultimately reducing nitrogen deposition to sensitive habitats.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
Parking and Electric Vehicle Charging Points	<p>This policy addresses car parking standards, agreed between all Lancashire authorities, and the minimum number of electric vehicle charging points to be provided in new residential and employment developments. Furthermore, secure, covered cycle parking will be required for apartment buildings.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This positive policy specifies parking standards in new developments, including the number of electric vehicle charging points.</p> <p>Encouraging residents to switch to electric vehicles will be a key mitigation approach to atmospheric pollution. Providing a sufficient number of charging points is key in supporting this modal shift.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
Communications and Digital Connectivity Infrastructure	<p>This policy supports the National Policy Planning Framework with regard to communications development and enables additional management of new telecommunications infrastructure. It promotes the sharing and mitigation of adverse impacts of digital infrastructure.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome. Not</p>	<p>LSEs of this policy on European sites alone cannot be excluded.</p> <p>While the highest risk with regard to tall telecommunications infrastructure is likely to arise in-combination, the delivery of several such schemes adjacent to the Martin Mere SPA / Ramsar have the potential to result in LSEs alone.</p>	<p>LSEs of this policy on European sites cannot be excluded in-combination.</p> <p>This policy provides support to communications and digital infrastructure across West Lancashire, provided that it is in line with the National Planning Policy Framework.</p>

	<p>including this policy would mean that no screening decision would be taken.</p>	<p>Overall, this policy would be screened in for Appropriate Assessment.</p>	<p>Depending on the nature and location of communications infrastructure, there are potential implications for European sites. For example, the delivery of large telecommunications masts in proximity to European sites designated for birds may lead to collision mortality, disturbance displacement and impacts on flightlines.</p> <p>The following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction) • Coastal squeeze • Collision mortality • Disturbance displacement • Impacts on flightlines <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
<p>Low Carbon and Renewable Energy</p>	<p>This policy designates specific opportunity areas for low carbon and renewable energy developments, specifically wind and solar energy schemes. It will support delivery of the LCRE, subject to criteria on design and assessments of environmental and landscape impacts. In recognition of net-zero targets, community-led LCRE schemes will also be supported.</p>	<p>LSEs of this policy on European sites alone cannot be excluded.</p> <p>While the highest risk with regard to wind energy schemes is likely to arise in-combination, the delivery of several such schemes adjacent to the Martin Mere SPA / Ramsar have the potential to result in LSEs alone.</p>	<p>LSEs of this policy on European sites cannot be excluded in-combination.</p> <p>This policy designates specific opportunity areas for wind and energy developments in West Lancashire, supporting renewable energies in line with the net-zero target.</p>

	<p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>Overall, this policy would be screened in for Appropriate Assessment.</p>	<p>While the switch to green energy is positive for mitigation of climate change, renewable energy proposals have their own implications for European sites.</p> <p>For example, the delivery of wind farms adjacent to European sites (or habitats that are functionally linked to these) may lead to bird collision mortality, disturbance displacement and impacts on flightlines.</p> <p>The following linking impact pathways to European sites are present:</p> <ul style="list-style-type: none"> • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance (during construction) • Coastal squeeze • Collision mortality • Disturbance displacement • Impacts on flightlines <p>Overall, this policy would be screened in for Appropriate Assessment.</p>
<p>Energy Efficiency in New Developments</p>	<p>Certain new residential and employment developments will need to deliver energy efficiency standards above national standards to help achieve the net-zero carbon goals. To ensure this, developers will be required to monitor, evaluate and improve energy efficiency in their developments.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy sets energy efficiency standards for certain types of residential</p>

	<p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>		<p>and employment developments above national standards.</p> <p>While this is an important strategy for climate change mitigation and net-zero targets, energy efficiency standards have no direct relevance for and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
<p>Water Efficiency in New Developments</p>	<p>This policy introduces tighter local restrictions on water consumption above the minimum optional Building Regulation standards. Increasing the water efficiency in new residential sites will require less water (reducing exploitation of water resources) and help reduce costs, energy use and carbon emissions. Enhanced water efficiency would also reduce the need for movement of water.</p> <p><u>Comment:</u> Not including this policy would imply that no screening would need to be undertaken.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This positive policy introduces higher water efficiency standards in new developments than outlined in current regulations, which will reduce the overall amount of water used and treated sewage effluent produced.</p> <p>This will have positive impacts on European sites that are sensitive to changes in water supply and quality. For example, lower water usage will result in a lower volume of treated sewage effluent (and thus phosphorus) discharged to the hydrological catchment of the Martine Mere SPA / Ramsar.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
<p>Other Policies</p>			

<p>Sequential Tests</p>	<p>This policy supports the sequential test with regard to town centre use and flood risk. Regarding town centres it guides development to town centre as a priority, then edges of town centres and out-of-centre locations. Regarding flood risk, it prioritises development in sites that are at the lowest risk of flooding.</p> <p>It also sets out the requirements and satisfactory criteria for undertaking successful sequential tests, including the area of search, availability, viability and deliverability of sequentially preferable sites.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome. Not including this policy would imply that no screening would need to be undertaken.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy sets out that sequential tests with regard to town centre uses and flood risk will be required. However, the mere support of sequential tests has no bearing on and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
<p>Viability</p>	<p>This policy sets out a hierarchy of viability, taking account of the priorities of the Local Plan as a whole. For example, this will encompass the desirable outcomes to be achieved through new housing developments. Housing can provide beneficial knock-on benefits, including improved open space, biodiversity net gain and urban regeneration. Such benefits may be made obligatory for new developments to come forward. General wording regarding the viability of development other than housing will also be set.</p> <p><u>Comment:</u> The alternative policy approaches would not have changed the LSEs screening outcome.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p> <p>This policy specifies a hierarchy of viability that will encompass the desirable outcomes of development sites, including improvements to open spaces and biodiversity net gain. However, the mere identification of a viability hierarchy has no bearing on and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
<p>Developer Contributions</p>	<p>This policy obliges certain developments to make financial contributions to new infrastructure requirements, in line with national planning guidance.</p>	<p>LSEs of this policy on European sites alone can be excluded. Please see in-combination column for explanation.</p>	<p>There are no LSEs of this policy on European sites in-combination.</p>

	<p><u>Comment:</u> Not including this policy would imply that no screening would need to be undertaken.</p>		<p>This policy stipulates that developer contributions for new infrastructure projects may be required in line with national policy.</p> <p>However, obligatory developer contributions have no direct bearing on and linking impact pathways to European sites.</p> <p>This policy would be screened out from Appropriate Assessment.</p>
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West Lancashire Local Plan 2023-2040

Scope, Issues & Options Consultation

Duty to Co-operate Statement

October 2021

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1. Introduction

1.1 The Localism Act and the National Planning Policy Framework (NPPF) created a duty on local planning authorities, county councils and other 'prescribed bodies' to cooperate with each other to address strategic matters relevant to their areas when preparing a development plan document, such as a Local Plan. The duty requires on-going constructive and active engagement on the preparation of development plan documents and other activities relating to the sustainable development and use of land, in particular in connection with strategic infrastructure or matters that would fall under the remit of a county council.

1.2 Paragraph 26 of the NPPF, which was revised in July 2021, states:

'Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.'

1.3 This Duty to Co-operate Statement accompanies the Issues & Options consultation of the West Lancashire Local Plan 2023-2040 and sets out how West Lancashire Borough Council has co-operated / is co-operating with neighbouring authorities and the 'prescribed' bodies (and certain other stakeholders) in relation to issues with potential cross-boundary impacts since the adoption of the West Lancashire Local Plan 2012-2027 in October 2013 and, in particular, as the Council has started this new Local Plan.

1.4 Paragraph 27 of the NPPF also advises:

'In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more 'statements of common ground', documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning practice guidance, and be made publicly available throughout the plan-making process to provide transparency.'

1.5 A Liverpool City Region Spatial Planning Statement of Common Ground was endorsed by West Lancashire Borough Council and the 6 Liverpool City Region local authorities in late 2019 and will be regularly reviewed and updated. It is too early in the plan-making stage at present to have produced any other statements of

common ground with other neighbouring authorities, but these will be prepared as this new Local Plan progresses.

1.6 The NPPF also provides further guidance on the Duty, referring to '*strategic matters that cross administrative boundaries*' (paragraph 24, NPPF). These strategic matters were identified as:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.7 The Duty to Co-operate applies to all local planning authorities, county councils in England and to a number of other 'prescribed bodies'. Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out who the 'prescribed bodies' are. The following are those local planning authorities, county councils and 'prescribed bodies' that are relevant in the context of the Duty for West Lancashire:

- Sefton Metropolitan Borough Council (as neighbouring authority and neighbouring highway authority)
- Knowsley Metropolitan Borough Council (as neighbouring authority and neighbouring highway authority)
- St Helens Metropolitan Borough Council (as neighbouring authority and neighbouring highway authority)
- Wigan Metropolitan Borough Council (as neighbouring authority and neighbouring highway authority)
- Chorley Borough Council (as a neighbouring authority)
- South Ribble Borough Council (as a neighbouring authority)
- Fylde Borough Council (as a neighbouring authority)
- Lancashire County Council (as County Council, minerals and waste local planning authority, transport authority, highway authority, education authority and Lead Local Flood Authority)

- Merseytravel (as a neighbouring Integrated Transport Authority)
- Transport for Greater Manchester (as a neighbouring Integrated Transport Authority)
- Environment Agency
- Historic England
- Natural England
- Marine Management Organisation
- Homes England
- Office of Rail Regulation
- Civil Aviation Authority

1.8 West Lancashire Borough Council also co-operates with several other bodies and organisations on strategic issues relevant to the Local Plan, and these are set out below:

- Liverpool City Region Combined Authority
- Greater Manchester Combined Authority
- Lancashire Local Enterprise Partnership
- Liverpool City Region Local Enterprise Partnership
- Lancashire Local Nature Partnership
- Highways England
- Network Rail
- Utilities Providers (United Utilities, National Grid, Electricity North West, Scottish Power Manweb)
- Coal Authority
- Lancashire Wildlife Trust
- Canal & River Trust
- Sport England
- West Lancashire Council for Voluntary Service (CVS)
- Emergency Services
- West Lancashire Clinical Commissioning Group
- Southport & Ormskirk Hospital Trust

2. Co-operation in the West Lancashire Local Plan 2023 – 2040

- 2.1. West Lancashire Borough Council's (WLBC's) co-operation can be broadly split into three types:
- Joint Evidence Base Studies and Projects
 - Regular officer-level meetings between authorities and with key stakeholders
 - Formal consultation with neighbouring authorities and key stakeholders throughout the preparation of the Local Plan
- 2.2. In relation to Joint Evidence Base Studies and Projects, WLBC has engaged, or is engaging, with neighbouring authorities and Lancashire County Council (LCC) since 2013 on a number of joint studies / projects, including:
- The Liverpool City Region Strategic Housing and Employment Land Market Assessment (LCR SHELMA), published in 2018.
 - The West Lancashire Strategic Housing and Employment Land Availability Assessment (SHELAA), produced annually. Whilst this is not a joint study, the methodology employed was subject to consultation with the LCR authorities who are part of the same Housing Market Area and/or Functional Economic Market Area as West Lancashire.
 - Merseyside and West Lancashire Gypsy & Traveller Accommodation Assessment (GTAA) (2014)
 - Various transport-related studies, strategies and masterplans with LCC and Merseytravel, including proposals for a Skelmersdale Rail Link, a West Lancashire Route Management Strategy and an Ormskirk Town Centre Movement Strategy.
- 2.3. In addition, the Council will be commissioning further evidence base studies as the new Local Plan progresses, some potentially joint studies (e.g. on Renewable Energy Capacity, and a Recreation Mitigation Strategy) and some involving close working with partners (e.g. Local Plan Transport Assessment in co-operation with Highways England and LCC).
- 2.4. In relation to regular officer-level meetings, West Lancashire officers are part of both the Liverpool City Region and Lancashire Planning Officer Groups, where colleagues from across the City Region / County regularly meet (every 6 weeks and every quarter respectively) to discuss matters that affect the whole City Region / County and that are cross-boundary and strategic in nature.

- 2.5. In addition, West Lancashire officers regularly meet with colleagues from neighbouring authorities separately to discuss strategic matters specific to the relationship between WLBC and their neighbours. In particular, due to the greater cross-boundary influences, officers meet with colleagues from Sefton and have frequently met with colleagues from Wigan, St Helens, Knowsley and LCC. These meetings may not always directly lead to the formulation of policy but they provide a crucial understanding of cross-boundary issues and an awareness of the needs of neighbours that has undoubtedly influenced the formulation of policy in the Local Plan.
- 2.6. In relation to key stakeholders, the main relationships are referred to in Section 1 above, but it is worth mentioning the ongoing engagement with United Utilities ('UU'), who have met with WLBC on many occasions to discuss the preparation of the last Local Plan, specific planning applications, the 'ceased' Local Plan Review (2016-2018), and now this new Local Plan 2023 - 2040. This is an important relationship given the vital role that United Utilities play in the Borough with regard to waste water treatment and the sewer network. UU and WLBC will continue to co-operate fully and openly in order to achieve the best Local Plan to balance resolving infrastructure constraints but still meeting development needs.
- 2.7. In relation to formal consultation, all neighbouring authorities and 'prescribed bodies' have been, and will continue to be, consulted on the preparation of the Local Plan 2023 - 2040.
- 2.8. Table A below provides a summary of the collaborative work WLBC has undertaken thus far in preparing the new Local Plan, and who it has co-operated with on each aspect of that work. As a starting point, the table is based upon the five strategic priorities previously set out by the NPPF and identifies strategic issues specific to West Lancashire under each of these priorities. As the Local Plan is at an early stage of preparation, these strategic priorities and issues may be updated in due course as the Local Plan progresses and in response to more up-to-date evidence, further collaborative working and public consultation. The nature of each of these strategic issues is briefly set out in the table, along with who is affected / obliged to co-operate on that issue, who is co-operating with whom, and how this is being done, and finally the anticipated outcome of that co-operation for that strategic issue.
- 2.9. As well as the co-operation undertaken on the strategic issues set out in Table A, WLBC has collaborated with several of the "prescribed" bodies as a matter of course on various general aspects of the preparation of the Local Plan.

Liverpool City Region Authorities

- 2.10. From a strategic planning perspective, WLBC co-operates most closely with the authorities in the Liverpool City Region, given that West Lancashire is most closely aligned economically and in terms of housing markets with the City Region, and is an associate member of the Liverpool City Region Combined Authority. In response to revisions to the National Planning Policy Framework in 2018, which introduced the requirement for strategic policy making authorities to prepare and maintain statements of common ground, a LCR Spatial Planning Statement of Common Ground (SoCG) was prepared. The SoCG was endorsed by all LCR authorities between July and October 2019, including by WLBC's Cabinet in September 2019. The SoCG covers a number of strategic, cross-boundary, planning-related issues. It sets out the current position in the City Region (including West Lancashire) regarding those issues, and identifies future approaches to working together on those issues, where relevant. It is intended that the Statement will be updated regularly, as and when an authority reaches a key milestone in its Local Plan preparation (e.g. Publication or Submission stage) and therefore provides a key element of evidence of co-operation by WLBC with its neighbours to the south.

The Environment Agency, Historic England and Natural England

- 2.11. These three organisations are statutory consultees in the preparation of a Local Plan as well as the Sustainability Appraisal (SA) and (for Natural England) the Habitats Regulations Assessment (HRA). As such, even at this early stage of Plan preparation, all three have been engaged on the preparation of the SA Scoping Report in May / June 2021. At the current Regulation 18 Stage, all three bodies are being specifically invited to comment on the Scope and Issues & Options material and the SA of the Issues & Options. Natural England are also being invited to engage with the Council and our HRA consultants (AECOM) on the HRA Screening Report for the Issues & Options.
- 2.12. In addition, the Environment Agency (as well as the Lead Local Flood Authority) have provided input to the Council on the West Lancashire Strategic Flood Risk Assessment (SFRA) Level 1 (completed in 2019) and SFRA Level 2 (completed in 2020) and will be consulted in relation to any updates required to these documents. This continues the positive working relationship that the Council had with the Environment Agency in preparing the 2012 Local Plan.

Homes England (HoE)

- 2.13. WLBC and HoE have co-operated for many years, mainly on matters relating to Skelmersdale town centre and the wider regeneration of Skelmersdale, involving

HoE-owned sites in and around Skelmersdale. In recent times, this has been a very fruitful relationship as the two organisations have together enabled the delivery of key housing allocations in the last Local Plan. This co-operation is continuing with the preparation of the new Local Plan.

West Lancashire Clinical Commissioning Group (CCG)

- 2.14. The Council and the West Lancs CCG have been liaising closely over recent times. WLBC has been able to gain a better understanding of the health infrastructure serving the Borough and where improvement is needed and development opportunities may arise, while the CCG have been able to reflect advice from WLBC on strategic planning in their management of their landholdings to ensure sufficient land and buildings are made available for health services. This has included ongoing input from the CCG on the WLBC Infrastructure Delivery Schedule and attendance of Council officers at CCG / NHS estates meetings. This relationship will continue as the new Local Plan progresses and particularly as potential / preferred development sites are considered, so that the CCG and Council can plan for development and health infrastructure in co-operation.

Transport and Highway Authorities

- 2.15. Lancashire County Council (LCC), as transport authority and highway authority covering West Lancashire, together with Merseytravel as integrated transport authority covering the rest of the Liverpool City Region, need to work with WLBC to deliver a Plan that deals with the cross-boundary movement of people and goods sustainably. In addition, Highways England are also key to understanding the impact any development proposals in West Lancashire (together with proposals in neighbouring areas) may have on the Strategic Road Network serving West Lancashire (primarily the M58 and M6). WLBC will be working with Highways England and LCC to undertake a Traffic Impact Assessment(s) of the new Local Plan's proposed development sites / strategy once they have been selected.
- 2.16. The Council is working closely with LCC, Merseytravel and Network Rail to bring forward the Skelmersdale Rail Link, as well as looking at opportunities to improve other rail services in the Borough, such as the Ormskirk to Preston line. The Council is supporting LCC in the delivery of the West Lancs Highways & Transport Masterplan; including LCC producing a Route Management Strategy for West Lancashire to identify how the Primary Route Network serving West Lancashire could be improved and an Ormskirk Town Centre Movement Strategy.

Table A: Duty to Co-operate – Strategic Issues for West Lancashire and Evidence of Co-operation in preparing the West Lancashire Local Plan DPD

Terminology in Table A

WLBC – West Lancashire Borough Council

LCC – Lancashire County Council

Neighbouring Authorities – Sefton, Knowsley, St Helens, Wigan, Chorley, South Ribble, Fylde

LCR Authorities – Liverpool City Region (Liverpool, Wirral, Knowsley, Sefton, St Helens, Halton)

Lancashire Authorities – Lancaster, Ribble Valley, Wyre, Blackpool (Unitary), Fylde, Preston, South Ribble, Chorley, Blackburn with Darwen (Unitary), Rossendale, Hyndburn, Burnley, Pendle and West Lancashire

HoE – Homes England

TfGM – Transport for Greater Manchester

CCG / NHS – Clinical Commissioning Group and National Health Service

CVS – Council for Voluntary Service

Strategic Priority	West Lancashire Strategic Issue	What is the nature of the strategic issue?	Who is affected / obliged to co-operate?	Who is co-operating with whom and How is this being done?	Anticipated Outcome	Impact on neighbouring authorities
Homes and Jobs	Housing Delivery	<p>Delivery of housing to meet identified needs in wider sub-regional housing market context and the need to demonstrate flexibility in meeting housing needs.</p> <p>Green Belt release may be required in West Lancs to meet housing needs and to ensure flexibility in delivery.</p>	WLBC and neighbouring authorities and LCR authorities	<p>WLBC has co-operated with the LCR authorities in preparing the LCR Strategic Housing and Employment Land Market Assessment (SHELMA) which, identifies the Housing Market Areas present within the study area and the Objectively-Assessed Need (OAN) for housing across the LCR and West Lancs and for each individual authority within the study area.</p> <p>Further to the SHELMA, on-going dialogue with the LCR authorities and formal consultation with neighbouring authorities in Lancashire and Greater Manchester through the new Local Plan will identify whether any LCR or neighbouring authorities have any unmet housing need which West Lancs may be asked to accommodate through a redistribution of housing need or whether West Lancs may have an unmet housing need which other authorities may be asked to meet. The LCR Statement of Common Ground (SoCG) indicates that presently there is no unmet housing need arising either at local authority level or from the city region as a whole which needs to be redistributed. It says this issue will be kept under review as individual councils prepare updated development plans. Where local authorities' local plan evidence indicates that they will not be able to accommodate their entire OAN, a process for agreeing the distribution of this unmet need will be set out.</p> <p>WLBC has prepared a Strategic Housing and Employment Land Availability Assessment (SHELAA) which supersedes the SHLAA prepared to support the adopted Local Plan. While this has been prepared only for West Lancs, all other authorities within the same Housing Market Area as West Lancs were consulted on the methodology for the SHELAA and support WLBC's approach.</p> <p>In relation to the potential for Green Belt release, WLBC prepared a Green Belt Study in 2011/12 during the preparation of the West Lancashire Local Plan 2021-27 DPD. This was prepared alongside separate studies undertaken by Sefton and Knowsley, based on a shared methodology. The studies explored whether any parts of the Green Belt in these three authorities no longer fulfil the purposes of the Green Belt. Subsequent evidence for the ceased Local Plan Review assessed every potential</p>	<p>WLBC will continue to work with the LCR Authorities within the context of the SoCG, and neighbouring authorities in Lancashire and Greater Manchester, to identify any necessary redistribution of housing need as is appropriate. This will directly influence the housing requirement that is set as part of the new Local Plan.</p> <p>As such, the housing requirement to be set should have the support of the LCR and neighbouring authorities.</p> <p>A part of the above process will be to ensure that the comparative merits of land in the Green Belt in all authorities involved is considered so that each authority meets as much as possible of their own OAN within their boundaries unless there are over-riding constraints to development that would prevent this from happening.</p>	To be determined (TBD)

Strategic Priority	West Lancashire Strategic Issue	What is the nature of the strategic issue?	Who is affected / obliged to co-operate?	Who is co-operating with whom and How is this being done?	Anticipated Outcome	Impact on neighbouring authorities
				development site against the purposes of the Green Belt and this exercise will be updated as part of evidence for the new Local Plan. The LCR SoCG indicates that the LCR authorities will continue involving each other closely when considering the case for localised changes to the Green Belt and will keep the need for a joint strategic review of it under consideration.		
	Employment Land Delivery	<p>Delivery of employment land to stimulate economic growth and provide new jobs.</p> <p>Green Belt release may be required in West Lancs to meet employment land need and ensure flexibility in delivery.</p>	WLBC and neighbouring authorities and LCR authorities	<p>WLBC has co-operated with the LCR authorities in preparing the LCR Strategic Housing and Employment Land Market Assessment (SHELMA) which identifies the Functional Economic Market Area that West Lancs sits within and an OAN range for employment land need across the LCR and West Lancs and for each individual authority within the study area.</p> <p>Further to the SHELMA, ongoing dialogue with the LCR authorities and formal consultation with neighbouring authorities through the new Local Plan will identify whether any LCR or neighbouring authorities have any unmet employment land need which West Lancs may be asked to accommodate through a redistribution of employment land need, or whether West Lancs may have an unmet employment land need which other authorities may be asked to meet. The SHELMA identifies an LCR-wide need for large-scale B8 (storage or distribution) development of at least 397 hectares before 2037 which the LCR authorities and West Lancs will need to consider how best to meet across the study area. The SoCG indicates that the LCR authorities agree that they will work collaboratively to identify the minimum proportions of the need for strategic B8 uses which should be accommodated within each local authority.</p> <p>WLBC has prepared a Strategic Housing and Employment Land Availability Assessment (SHELAA) which seeks to identify any previously unidentified sites which may be suitable for employment land development. While this has been prepared only for West Lancs, all other authorities within the same Functional Economic Market Area as West Lancs were consulted on the methodology for the SHELAA and support WLBC's approach.</p> <p>In relation to the potential for Green Belt release, WLBC prepared a Green Belt Study in 2011/12 during the preparation of the West Lancashire Local Plan 2021-27 DPD. This was prepared alongside separate studies undertaken by Sefton and Knowsley, based on a shared methodology. The studies explored whether any parts of the Green Belt in these three authorities no longer fulfil the purposes of the Green Belt. Evidence for the ceased Local Plan Review assessed every potential development site against the purposes of the Green Belt and this will be updated as part of evidence for the new Local Plan. The LCR SoCG indicates that the LCR authorities will continue involving each other closely when considering the case for localised changes to the Green Belt and will keep the need for a joint strategic review of the Green Belt under consideration.</p>	<p>WLBC will continue to work with the LCR Authorities within the context of the SoCG to identify any necessary / agreed redistribution of employment land need, particularly for large-scale B8, as is appropriate. WLBC will also continue to work with neighbouring authorities in Lancashire and Greater Manchester.</p> <p>As such, the employment land requirement to be set should have the support of the LCR and neighbouring authorities.</p> <p>A part of the above process will be to ensure that the comparative merits of land in the Green Belt in all authorities involved is considered so that each authority meets as much as possible of their own OAN within their boundaries unless there are over-riding constraints to development that would prevent this from happening.</p>	TBD

Strategic Priority	West Lancashire Strategic Issue	What is the nature of the strategic issue?	Who is affected / obliged to co-operate?	Who is co-operating with whom and How is this being done?	Anticipated Outcome	Impact on neighbouring authorities
	Significant levels of commuting in and out of West Lancashire	West Lancashire sees a high proportion of employment-related commuting across its boundaries, both out of West Lancs (to places like Liverpool, Sefton and Wigan) and into West Lancs (from Sefton and Wigan in particular).	WLBC, LCR authorities and Lancashire authorities Highways England, LCC, Merseytravel, Network Rail and TfGM	WLBC will continue to consult with neighbouring authorities and with transport authorities regarding economic and employment land policies in the new Local Plan through formal consultation at each stage of the Local Plan preparation and more general engagement throughout the process. Study work conducted with LCC, Merseytravel and / or TfGM has explored, and continues to explore, the potential transport infrastructure improvements that may be beneficial to address any increased commuting from West Lancashire to surrounding areas. This includes: <ul style="list-style-type: none"> • West Lancashire Highways & Transport Masterplan • West Lancashire Route Management Strategy • Ormskirk Town Centre Movement Strategy • Rail Study and business case relating to Skelmersdale • Rail Studies relating to electrification of Ormskirk to Preston line and the re-opening of the Burscough Curves 	It is accepted that West Lancashire has close economic and employment links with neighbouring authorities and nearby major cities such as Liverpool, Manchester and Preston and that this relationship will continue. Proposals for new or improved transport infrastructure have not been fully defined at this stage, but there is a clear working relationship between WLBC and the various transport authorities seeking to deliver solutions to any transport infrastructure concerns.	TBD.
	Provision for Travellers	Delivery of sites for Travellers to meet identified needs. Green Belt may have to be used in West Lancashire to meet this need.	WLBC and neighbouring authorities	WLBC and the LCR authorities (except Halton) co-operated to prepare a Merseyside and West Lancashire GTAA in 2013/14. This identified the need for Traveller Sites in each authority to 2033. WLBC prepared a GTAA for the Borough in 2017 which extended needs to 2037 and which reflected the Government's 2016 redefinition of the term 'Traveller'. (Other LCR authorities were invited to participate jointly in this Study.) The 2017 Study will be updated in due course.	While it is anticipated that each authority will meet its own needs for Traveller sites, by nature the movement of Travellers can be a cross-boundary issue, and so WLBC will continue to liaise with all neighbouring authorities on this issue to identify the most appropriate policy for Traveller site provision.	TBD – but no, or minimal, impacts are anticipated on areas outside West Lancs.
Retail, leisure and other commercial development	Retail provision and sub-regional hierarchy of centres	West Lancashire is reliant on Centres in other authorities (Southport, Wigan, Liverpool and Preston) for access to comparison retail and leisure and, to a lesser degree, convenience retail. West Lancashire has three Key Service Centres, one of which (Skelmersdale) is a Regional Town Centre.	WLBC and neighbouring authorities LCC, Merseytravel and TfGM	WLBC will consult with neighbouring authorities and with transport authorities regarding town centre and retail policy and the hierarchy of centres in its Local Plan. This will be through formal consultation at each stage of the new Local Plan and more general engagement throughout the process. The work will be informed by a Town Centre, Retail and Leisure Study produced / updated as part of the evidence base for the new Local Plan.	The new Local Plan will, as far as is possible, seek to deliver new retail and leisure provision within West Lancashire to serve any increase to West Lancs' needs. However, it is accepted that this Borough has close links with neighbouring authorities and nearby major cities such as Liverpool, Manchester and Preston regarding comparison retail and leisure, and that this relationship will continue. Therefore transport infrastructure must be improved in places to accommodate this demand.	TBD
	Skelmersdale Town Centre	WLBC is focused on improving the Town Centre physically and, in terms of provision of retail, leisure and other commercial developments, to cement Skelmersdale Town	WLBC and neighbouring authorities, LCC and HoE	WLBC has been working with partners (including LCC and HoE) for several years to see the delivery of new development and new infrastructure in Skelmersdale Town Centre in order to revitalise the Centre as a retail and leisure destination within West Lancashire. A new Town Centre development is currently under construction.	By consulting closely with neighbouring authorities on this issue, it is anticipated that there will be no objections to the continued proposals for Skelmersdale Town Centre in the new Local Plan.	TBD – but no, or minimal, impacts are anticipated on areas outside West Lancs.

Strategic Priority	West Lancashire Strategic Issue	What is the nature of the strategic issue?	Who is affected / obliged to co-operate?	Who is co-operating with whom and How is this being done?	Anticipated Outcome	Impact on neighbouring authorities
		Centre's role as a Regional Town Centre. While such developments will hopefully make the Town Centre more attractive to a wider part of the Borough, it is not anticipated that it will draw significant footfall from other centres outside the Borough.		Proposals for the Town Centre have evolved over time, and will continue to evolve and so WLBC will continue to engage with all partners and neighbouring authorities as a suitable policy for the Town Centre is prepared for the new Local Plan.		
Infrastructure	Transport	While the majority of impacts on the transport network from development in West Lancashire will be within the Borough, the Borough's transport network is used by individuals and businesses travelling through the Borough to and from neighbouring authorities, and some impacts may be felt on more strategic transport networks, such as motorways.	WLBC and neighbouring authorities LCC, Merseytravel, TfGM, Highways England and Network Rail	WLBC will continue to engage with neighbouring authorities and with transport authorities regarding potential policies in the new Local Plan on transport infrastructure through both formal consultation at each stage of the new Local Plan and more general engagement throughout the process. Study work conducted with Highways England, LCC, Merseytravel and / or TfGM has explored, and continues to explore, the potential transport infrastructure improvements that may be beneficial to address any increased recreational travel and commuting, as well as business travel in connection with the movement of goods and services from West Lancashire to surrounding areas. This includes: <ul style="list-style-type: none"> • West Lancashire Highways & Transport Masterplan • West Lancashire Route Management Strategy • Ormskirk Town Centre Movement Strategy • Rail Study and business case relating to Skelmersdale • Rail Studies relating to electrification of Ormskirk to Preston line and the re-opening of the Burscough Curves • Port of Liverpool improved road access, which includes considering either a new route through the Rimrose Valley or improvements to the A5036 Dunning's Bridge Road corridor (both outside West Lancashire) • West Lancashire Local Cycling and Walking Infrastructure Plan (LCWIP) • Leeds – Liverpool Canal improvements. 	WLBC will work collaboratively with neighbouring authorities and transport authorities in the planning and delivery of cross-boundary strategic projects. It is hoped that WLBC and LCC can arrive at agreed positions with neighbouring planning and transport authorities on how the impact of new development on cross-boundary transport infrastructure will be managed. However, it is recognised that some infrastructure constraints will not have easy solutions and so co-operation on this key issue will be vital and some potential locations for development may need to be reconsidered if no solutions are forthcoming.	TBD
	Water-related infrastructure	Different parts of the Borough are affected by a Waste Water Treatment constraint / water supply issues / surface water issues / drainage and / or flood risk. However, these constraints are likely to have a limited effect on areas outside the Borough	WLBC, Environment Agency, LCC (Lead Local Flood Authority) and United Utilities	With the exception of the strategic management of flood risk across river catchments these issues are not likely to be strategic in that they may not directly affect neighbouring authorities. However, they have a crucial effect on the new Local Plan proposals and could therefore create indirect effects on neighbouring authorities if they limit delivery of housing or employment land in certain parts of the Borough. Therefore, WLBC will continue to consult with neighbouring authorities regarding policies in its new Local Plan affected by these matters through formal consultation at each stage of the Local Plan and more general engagement throughout the process.	With the support of the Environment Agency, United Utilities and LCC, the new Local Plan will identify policies to enable development within the most appropriate locations, in an appropriate timescale and without negatively affecting issues of flood risk, surface water drainage, water supply or waste water disposal. As such, co-operation on this issue should result in support from	TBD – minimal, impacts are anticipated on areas outside West Lancs.

Strategic Priority	West Lancashire Strategic Issue	What is the nature of the strategic issue?	Who is affected / obliged to co-operate?	Who is co-operating with whom and How is this being done?	Anticipated Outcome	Impact on neighbouring authorities
				<p>WLBC will also continue to engage closely with United Utilities, the Environment Agency and LCC (as Lead Local Flood Authority) on these issues throughout the preparation of the new Local Plan, meeting regularly with all three organisations in an attempt to arrive at a solution, where appropriate.</p> <p>A specific issue in West Lancashire, which requires liaison with the EA as the responsible body, is the future of 5 satellite pumping stations in the Alt Crossens catchment. Turning off these pumping stations, as planned, would result in a significant area of high quality agricultural land in West Lancashire becoming permanently wet.</p>	relevant prescribed bodies on the Local Plan policies.	
	Digital infrastructure	To create an interlinking full fibre network, improving local areas of deficiency, to deliver ultrafast connectivity for homes and businesses and unlock major investment. To ensure mobile phone connectivity.	WLBC, neighbouring authorities, LCC, Openreach (BT), mobile network operators (MNOs)	The Lancashire Local Broadband Plan (2012) acknowledges the importance of superfast broadband to the economy. Lancashire County Council, supported by commercial providers BT, used public money in a joint venture to roll out superfast broadband across the county, including in West Lancashire. The LCR SoCG indicates investment plans should be produced to accelerate investment and deployment in shared digital infrastructure.	Ultrafast broadband is less well developed in Skelmersdale & Up Holland, Burscough or Ormskirk, where most of West Lancashire's homes and businesses are located. Continued improvement in digital connectivity in West Lancashire will provide improved access for businesses and homes with benefits for investment.	TBD
	Minerals & Waste	Minerals and Waste planning policy matters affecting West Lancashire are considered by Lancashire County Council	WLBC, LCC, LCR authorities and the Coal Authority	WLBC will continue to engage with LCC as they prepare a new Lancashire Minerals and Waste Local Plan and with the LCR authorities should they need to review the Merseyside Waste DPD.	As necessary, a new Local Plan for West Lancs will reflect the Minerals and Waste policies to be prepared by LCC and their implications for new development.	TBD – but no, or minimal, impacts are anticipated on areas outside West Lancs.
Health, security, community and cultural infrastructure	Infrastructure Delivery Plan (IDP)	New development as proposed by the Local Plan will have implications for a range of "social" and "cultural" infrastructure providers.	WLBC, LCC, CCG / NHS, Emergency Services, Canal & River Trust, Sport England and CVS.	A wide range of "social" and "cultural" infrastructure providers, including those listed, have been, and will continue to be, engaged upon in the new Local Plan through the formal consultation at each stage of preparation, through the preparation of the IDP and through more general engagement on health-related matters.	WLBC and its partners will identify suitable policies and proposals to ensure that appropriate social and cultural infrastructure is provided in West Lancashire to support new development and to promote healthier lifestyles.	TBD – minimal, impacts are anticipated on areas outside West Lancs.
Climate change and natural and historic environment	Managing impacts in relation to International Habitat Sites	New development, cumulatively across sub-regions, can have significant impacts on International Habitat Sites and such impacts should be reduced or mitigated.	WLBC, neighbouring authorities, LCR authorities and Natural England	<p>WLBC has had a Habitats Regulations Assessment (HRA) Screening Report carried out by consultants (AECOM) for the Issues & Options stage of the new Local Plan, and this is being consulted upon alongside the Local Plan, with particular input from Natural England. The same consultants will prepare the HRA for later stages of the Local Plan and, if necessary, an Appropriate Assessment (AA) of identified impacts.</p> <p>Consultation with Natural England has indicated a need to consider the recreation effects of residents in West Lancashire visiting International Habitat Sites, including the Sefton Coast outside the Borough. Consequently, WLBC has joined the LCR in undertaking a Joint Recreation Mitigation Strategy dealing with this issue.</p>	<p>The HRA / AA will inform each iteration of the new Local Plan and so result in a Local Plan that has been prepared with an understanding of the wider, cross-boundary implications of development for International Habitat Sites both within the Borough and elsewhere in surrounding areas.</p> <p>The HRA will identify where specific mitigation measures will be required in relation to developments in West Lancashire affecting international sites and the new Local Plan will reflect the commitment of West</p>	TBD

Strategic Priority	West Lancashire Strategic Issue	What is the nature of the strategic issue?	Who is affected / obliged to co-operate?	Who is co-operating with whom and How is this being done?	Anticipated Outcome	Impact on neighbouring authorities
					<p>Lancashire to work with neighbouring authorities, as appropriate, to this end.</p> <p>The joint Recreation Mitigation Strategy will enable the delivery of a co-ordinated approach by the LCR and WLBC for mitigating impacts on International Habitat Sites from recreational pressures as a result of new residential developments.</p>	
	Climate change, renewable energy and coastal change / management	Managing the effects of climate change upon West Lancashire (and beyond) and contributing towards a reduction in greenhouse gases locally by supporting renewable energy production as appropriate.	WLBC, neighbouring authorities, LCR authorities, Environment Agency, Marine Management Organisation and Natural England	<p>The LCR local authorities, WLBC and Warrington Borough Council jointly prepared the Renewable Energy Capacity Study in 2011 which focused on wind energy. WLBC subsequently prepared a Low Carbon and Renewable Energy Study (May 2019) which considered wind, solar and other renewable energy such as heat pumps, anaerobic digestion etc. The LCR SoCG indicates that authorities will work together to generate a new evidence base regarding renewable energy.</p> <p>West Lancashire has a coastline along the Ribble Estuary which will be affected by climate change in the form of sea level rise. The Environment Agency is responsible for coastal defences in this area and is also nationally responsible for producing Shoreline Management Plans (SMPs), indicating how sections of coastline will be managed into the future.</p> <p>Climate change is a wide-ranging matter which also influences other strategic issues in West Lancashire e.g. flood risk from other sources.</p>	<p>A Renewable Energy Study will inform the new Local Plan in deciding what forms of renewable energy may be appropriate in West Lancashire and where. It is possible that schemes may cross or be close to the boundaries of other local authorities.</p> <p>Management of the coastline crosses local authority boundaries and requires multi-agency co-operation. The SMP covering the West Lancashire and Sefton coastline is likely to be updated. Coastal management will influence future flood risk and therefore where it may be appropriate for future development to be located.</p>	TBD
	Biodiversity and Green Infrastructure	New development as proposed in the Local Plan may affect biodiversity and Green Infrastructure (GI) but may also offer opportunities to improve biodiversity and GI.	WLBC, neighbouring authorities, LCR authorities, Natural England, Wildlife Trust, LCC and Sport England	<p>It is expected that the Environment Bill will mandate a requirement for a minimum 10% biodiversity net gain as a result of new development from 2023. WLBC is liaising with Merseyside and Lancashire local authorities in establishing how this may be best achieved in Local Plans.</p> <p>Green Infrastructure is a strategic network of multi-functional green and blue (water) spaces and other green features, urban and rural, and so crosses local authority boundaries. The LCR SoCG states that the seven local authorities recognise the need for a strategic approach to natural assets and Green Infrastructure so will work with a range of partners to protect, enhance and where possible extend the network.</p>	<p>An approach to inform a new Local Plan policy which deals with Biodiversity Net Gain.</p> <p>A co-ordinated approach to the strategic Green Infrastructure network which will inform Local Plan policy and the designation of sites.</p>	TBD

3. Impact on Neighbouring Authorities

- 3.1. As the new Local Plan progresses and the proposed sites for development and proposed planning policies are finalised, the final column of Table A above will be populated and will set out where the new Local Plan may, potentially, have an impact on neighbouring authorities. This could raise a number of key strategic, cross-boundary issues which warrant more detailed discussion not only to demonstrate the legal compliance aspect of the Duty to Co-operate, but the soundness aspects of the Duty as well. Clearly, at early stage in preparing the new Local Plan, the Council cannot predetermine what these impacts and issues will be.
- 3.2. In general terms, probably the most significant cross-boundary strategic issue is that of meeting housing and employment land needs. Whilst the current adopted local plans for neighbouring authorities have no unmet needs that are proposed or requested to be met in West Lancashire, there can be no certainty of whether or not neighbouring authorities may have unmet housing and/or employment land needs in the medium and longer-term until respective local evidence is finalised and consideration is given to the matter in their next round of local plans. As such, the conversations to be had with neighbouring authorities once local evidence is finalised, or new plans are prepared, will be central to this issue (and will highlight whether it is an issue at all).
- 3.3. Should any unmet needs arise in neighbouring authority areas, consideration would need to be given as to whether West Lancashire would be a suitable place to meet that need and, if that were agreed, the issue of where within West Lancashire such need could be met would become a strategic, cross boundary issue. The issue may have transport-related, or infrastructure-related implications, or impacts on commuting patterns. At this early stage in the new Local Plan we cannot be more specific but, as the Local Plan progresses, this may become an issue that needs more engagement and co-operation.
- 3.4. West Lancashire sits in a position between three city-regions and has links to all three, but is outside the established Combined Authorities of Greater Manchester and the Liverpool City Region (although it is an associate member of the Liverpool City Region Combined Authority). The possibility of a new Lancashire Combined Authority or combined Lancashire authority working group has been under consideration. As such, work under the Duty to Co-operate can help ensure that there is correlation and consistency between neighbouring Spatial Frameworks and the West Lancashire Local Plan.
- 3.5. Below this strategic level of planning, the Council could consider a joint Local Plan with an individual authority(ies) within the neighbouring Combined Authorities or Lancashire. However, there has been no issue raised at the current time that would justify this and, given the different stages of Local Plan preparation which West Lancashire's neighbours are currently at, it would be unlikely that a joint Local Plan would be appropriate.

4. Summary

- 4.1. In summary, West Lancashire Borough Council demonstrated a high level of co-operation with other authorities and public bodies in the preparation of the last (2012) West Lancashire Local Plan and is committed to continuing this in the preparation of the new Local Plan, as can be seen by what co-operation has already taken place at this early stage of the new Plan's preparation. In particular, the Council has participated in a number of joint projects with other authorities on key evidence base documents and is working closely with key infrastructure providers to ensure that the new Local Plan will deliver what infrastructure is needed to address constraints and facilitate new development.
- 4.2. This Duty to Co-operate Statement will be updated after the Local Plan Scope, Issues & Options Consultation and at subsequent stages of the Plan to show how the Council is fulfilling the Duty to Co-operate as it prepares a new Local Plan. Future updates should also be read in conjunction with respective Statements of Common Ground with neighbouring authorities, such as the LCR.

Equality Impact Assessment Form



Directorate: Place & Community	Service: Growth & Development
Completed by: Helen Hatch	Date: 5/10/2021
Subject Title: LOCAL PLAN 2023-2040 – PREPARATION OF ISSUES AND OPTIONS	
1. DESCRIPTION	
Is a policy or strategy being produced or revised:	Yes This is the first stage of the Local Plans' preparation, which considers the Scope, the Issues and the Options for the emerging Local Plan. Whilst it does not, at this stage, produce formal policies or strategies, it does identify the issues that policies will ultimately need to address, and the policy options that may be considered.
Is a service being designed, redesigned or cut back:	No
Is a commissioning plan or contract specification being developed:	No
Is a budget being set or funding allocated:	No
Is a programme or project being planned:	No
Are recommendations being presented to senior managers and/or Councillors:	This is the first stage of the Local Plan's preparation, which considers the Scope, the Issues and the Options for the emerging Local Plan. It does not contain any recommendations, per se; however, Council Planning Officers have, against each set of policy options, indicated a 'preferred' approach. This judgement is not fixed; it can be reviewed and adapted following consultation, in the light of feedback received.
Does the activity contribute to meeting our duties under the Equality Act 2010 and Public Sector Equality Duty (Eliminating unlawful discrimination / harassment, advancing equality of opportunity, fostering good relations):	Yes The Local Plan will guide development in the Borough to 2040. Through the plan, we should ensure due consideration is given to equality and addressing inequalities.
Details of the matter under consideration:	Preparation of the West Lancashire Local Plan 2023-2040 Issues and Options material ('Regulation 18' stage).
<p><i>If you answered Yes to any of the above go straight to Section 3</i></p> <p><i>If you answered No to all the above please complete Section 2</i></p>	

2. RELEVANCE	
Does the work being carried out impact on service users, staff or Councillors (stakeholders):	n/a
If Yes , provide details of how this impacts on service users, staff or Councillors (stakeholders): <i>If you answered Yes go to Section 3</i>	n/a
If you answered No to both Sections 1 and 2 provide details of why there is no impact on these three groups: <i>You do not need to complete the rest of this form.</i>	n/a
3. EVIDENCE COLLECTION	
Who does the work being carried out impact on, i.e. who is/are the stakeholder(s)?	The Local Plan will guide development in the Borough to 2040 and has the opportunity to affect, directly or indirectly, all residents, businesses of West Lancashire, or other organisations, in some way.
If the work being carried out relates to a universal service, who needs or uses it most? (Is there any particular group affected more than others)?	n/a The work does not relate to a universal service.
Which of the protected characteristics are most relevant to the work being carried out? Age Gender Disability Race and Culture Sexual Orientation Religion or Belief Gender Reassignment Marriage and Civil Partnership Pregnancy and Maternity	Yes Yes Yes Yes Yes Yes Yes Yes Yes Each of the above groups has the potential to be affected by the Local Plan. These characteristics have been considered during the identification of Issues and Options and through the accompanying Sustainability Appraisal. For example, by considering whether all the equality characteristic groups have the potential for equal access to housing or services.

4. DATA ANALYSIS	
In relation to the work being carried out, and the service/function in question, who is actually or currently using the service and why?	The Local Plan will guide development in the Borough to 2040. The strategic plan will guide developers, influence stakeholders and its impacts will likely be felt, directly or indirectly, by the Borough's residents.
What will the impact of the work being carried out be on usage/the stakeholders?	The Local Plan will guide development in the Borough to 2040. The Local Plan will seek to ensure that only the most appropriate development is delivered in the Borough.
What are people's views about the services? Are some customers more satisfied than others, and if so what are the reasons? Can these be affected by the proposals?	The Local Plan will guide development in the Borough to 2040. Most people accessing the Local Plan at 'first contact' will be developers and the Local Plan will seek to ensure that only the most appropriate development is delivered in the Borough. This will ensure that the best interests of the Borough's residents are appropriately considered through planning applications.
What sources of data including consultation results have you used to analyse the impact of the work being carried out on users/stakeholders with protected characteristics?	The Issues for the Borough have been drawn from the Local Plan evidence base which includes socio-demographic data, where available, relating to protected characteristics. Subject to Cabinet approval, the Issues and Options will be publicly consulted upon, and users / stakeholders will be able to submit comments in relation to protected characteristics, including any concerns that specific characteristics have not been appropriately considered.
If any further data/consultation is needed and is to be gathered, please specify:	As above. In addition, the Local Plan evidence base will be updated once the Census 2021 results are released in 2022, including data on protected characteristics, to ensure that the evidence base is as up to date as possible.
5. IMPACT OF DECISIONS	
In what way will the changes impact on people with particular protected characteristics (either positively or negatively or in terms of disproportionate impact)?	The Issues and Options should not have any negative impacts on protected characteristics. These characteristics have been considered during the identification of Issues and Options and through the accompanying Sustainability Appraisal.

6. CONSIDERING THE IMPACT	
If there is a negative impact what action can be taken to mitigate it? (If it is not possible or desirable to take actions to reduce the impact, explain why this is the case (e.g. legislative or financial drivers etc.).	n/a
What actions do you plan to take to address any other issues above?	No actions required at this stage.
7. MONITORING AND REVIEWING	
When will this assessment be reviewed and who will review it?	The impacts of the Local Plan on equality and protected characteristics will be considered at each stage of the its preparation, including the development of the plans preferred strategies and policies. This will primarily be reviewed by Council Planning Officers, in conjunction with the accompanying Sustainability Appraisals. Members, and the public, will also have the opportunity to feed in comments during the Plan's preparation – including public consultations.

West Lancashire Local Plan 2023-2040

HEALTH IMPACT ASSESSMENT

October 2021

**Heidi McDougall BSc (Hons) MBA
Corporate Director of Place and Community**

Directorate of Place and Community
West Lancashire Borough Council
52 Derby St, Ormskirk, Lancashire, L39 2DF

Health Impact Assessment: Local Plan 2023 - 2040 – Issues and Options

Health Impact Assessments (HIAs) are intended to help make decisions by predicting the health consequences of a proposal being implemented. A HIA should, ideally, also seek to make recommendations on how positive impacts of health can be enhanced, and negative impacts minimised. It should consider the distribution of health impacts and whether those impacts may be more greatly felt by certain population groups.

The majority of proposed plans and policies will have an impact on health to some extent. Local plans and policies can have significant negative impacts on health if they are not appropriately considered. Conversely, some policies also have the potential to deliver significant positive impacts on health. Consequently, the Council wishes to ensure that health impacts are appropriately considered at each stage of the Local Plan's preparation.

In preparing a Local Plan, the Council must undertake a Strategic Environmental Assessment (SEA) and the governing SEA Directive states this should include human health effects [of the policies]. SEA requirements are included as part of the Council's Sustainability Appraisal (SA), which is structured along the lines of social, economic and environmental sustainability outcomes with an understanding that all of these are wider health determinants.

The general theme of 'health impacts' has therefore been considered within the Sustainability Appraisal, most notably within topic area 1 – Population (, Health) and Social Inclusion. The SA has assessed all the policy options presented at this 'Issues and Options' stage of the Local Plan, and, in doing so, health has been considered centrally in the assessment of the options.

However, the importance of health is acutely recognised and so, in addition to the SA, a 'light touch' HIA been prepared for this first stage of the Local Plan's preparation. It should be stressed here that it is difficult to undertake a detailed Health Impact Assessment of the policy options, as they are currently only loose suggestions of what a policy could entail. Whilst the Council's preferred policy approach is indicated, to solely assess the preferred approach would risk seeming to pre-determine the outcome of public consultation or serve to preclude / exclude all or parts of the other options. Therefore, without a 'concrete' policy, containing sufficient details of the direction and intent of each policy, it is very difficult to assess the health impacts of the individual policy options through a specific HIA at this 'Issues & Options' stage of the Local Plan.

Instead, this HIA Framework is designed very broadly, to indicate the positive and negative impacts that could be expected through the 'principal intent' of each policy. Essentially, whilst the detail of the policy approaches is still to be decided, and in some cases policy approaches may even be abandoned, the general principle of requiring a policy to control X or Y can be assessed in relation to its potential impacts on health.

The framework used in this HIA is based on that contained in Table 1 (Framework) of the document 'Health Impact Assessment Tools' published by the Department of Health (2010). The document is available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/216008/dh_120106.pdf.

The document is listed in Public Health England's resource pack for useful links for HIAs (PHE HIA Event pack) and so is taken to be an appropriate framework to base a broad HIA upon.

Alternative HIA approaches, such as the 'HUDU', have not been considered appropriate at this time, as they are dependent on a specific 'proposal' to assess health impacts against.

This HIA assesses each group of proposed policies in the new Local Plan against four questions, namely:

- Will the proposals have a direct impact on health, mental health and wellbeing?
- Will the proposals have an impact on social, economic and environmental living conditions that would indirectly affect health?
- Will the proposals affect an individual's ability to improve their own health and wellbeing?
- Will there be a change in demand for or access to health and social care services?

For each question, potential positive and negative health impacts are considered.

The groups of proposed policies are:

- Strategic Policies
- Housing and Community
- Economy and Employment
- Environment and Health
- Transport and Infrastructure
- Other Policies

Strategic Policies

- ST01 - Sustainable Development
- *ST02a - Housing requirements**
- *ST02b - Employment land requirements**
- *ST02c - Spatial Distribution**
- ST03 - Climate change and environmental sustainability
- ST04 - Settlement boundaries
- *ST05 - Strategic sites**

*A policy need has been identified but evidence is still pending in relation to policy approaches / options.

Question	Potential positive health impacts	Potential negative health impacts
<p>Will the proposals have a direct impact on health, mental health and wellbeing?</p> <p><i>For example, would it cause ill-health, affecting social inclusion, independence and participation?</i></p>	<p>These strategic policies would help to positively and pro-actively plan to ensure that development is located in the most sustainable settlements, close to social and health services and outdoor leisure facilities, promoting physical and mental health and social inclusion.</p>	<p>It is more likely that the absence of these strategies would have a detrimental impact on the health of West Lancashire's residents. The Council would be less able to manage development in a way that can protect physical and mental health and facilitate improvements.</p>
<p>Will the proposals have an impact on social, economic and environmental living conditions that would indirectly affect health?</p> <p><i>For example, would it affect housing, transport, child development, education, good employment opportunities, green space or climate change?</i></p>	<p>These strategic policies would help to guide appropriate development, ensuring it considers environmental living conditions (climate change, biodiversity), provides appropriate levels of housing and employment opportunities, and would help ensure supporting infrastructure (transport, leisure, services).</p>	<p>As above.</p>

Question	Potential positive health impacts	Potential negative health impacts
<p>Will the proposals affect an individual's ability to improve their own health and wellbeing?</p> <p><i>For example, will it affect their ability to be physically active, choose healthy food, reduce drinking and smoking?</i></p>	<p>These strategic policies would, both directly and indirectly, support the ability of individuals to improve their own health and wellbeing. Many of the details will, however, be provided through the individual policies.</p>	<p>As above.</p>
<p>Will there be a change in demand for or access to health and social care services?</p> <p><i>For example: Primary Care, Hospital Care, Community Services, Mental Health and Social Services?</i></p>	<p>This will be subject to the housing and employment numbers (not yet decided at this stage of preparing the Local Plan), but any increase in identified need / provision may result in an increase in demand for health and social care services.</p>	<p>The Council will need to work with health and social care service providers to ensure that appropriate infrastructure is in place to respond to any increased demand arising from new housing and employment in the Borough.</p>

Housing and Community

- HC01a – Where housing can be located
- HC01b – Using land efficiently – brownfield development and density
- HC01c – Dwelling sizes
- HC01d – Affordable housing
- HC01e – Housing for older people
- HC01f – Custom and self-build housing
- HC01g – Accommodation for students
- HC01h – Caravan and houseboat dwellers
- HC01i – Gypsy, Traveller and Travelling Show People
- HC01j – Temporary agricultural workers dwellings
- HC02 – Place-making
- HC03 – Heritage
- HC04 – Community Facilities

Question	Potential positive health impacts	Potential negative health impacts
<p>Will the proposals have a direct impact on health, mental health and wellbeing?</p> <p><i>For example, would it cause ill-health, affecting social inclusion, independence and participation?</i></p>	<p>All of the policies governing housing will help ensure that there is an appropriate provision, and choice, of new housing in appropriate locations. Housing is a major contributor to health, mental health and wellbeing, and can support social inclusion, independence and participation for all groups – including those with protected characteristics.</p>	<p>It is more likely that the absence of these policies would have a detrimental impact on the health of West Lancashire's residents. The Council would be less able to manage development in a way that can protect physical and mental health and facilitate improvements.</p>

Question	Potential positive health impacts	Potential negative health impacts
	Place making policy should ensure that developments are appropriately designed, and this can include considerations for health and mobility – including conditions such as dementia.	
<p>Will the proposals have an impact on social, economic and environmental living conditions that would indirectly affect health?</p> <p><i>For example, would it affect housing, transport, child development, education, good employment opportunities, green space or climate change?</i></p>	All of the policies governing housing and communities will impact environmental living conditions, with the aim of improving housing and design of developments and ensuring community facilities are appropriately protected and supported.	As above
<p>Will the proposals affect an individual's ability to improve their own health and wellbeing?</p> <p><i>For example, will it affect their ability to be physically active, choose healthy food, reduce drinking and smoking?</i></p>	These policy areas would support the ability of individuals to improve their own health and wellbeing. For example, a policy supporting good design could help improve accessibility promoting physical activity. Having a suitable home is an important factor in one's health.	As above
<p>Will there be a change in demand for or access to health and social care services?</p> <p><i>For example: Primary Care, Hospital Care, Community Services, Mental Health and Social Services?</i></p>	This will be subject to the housing and employment numbers, but any increase in identified need / provision may result in an increase in demand for health and social care services.	The Council will need to work with health and social care services to ensure that appropriate infrastructure is in place to respond to any increased demand arising from new housing and employment in the Borough.

Economy and Employment

- EE01 – Employment Areas
- EE02 – Rural economy
- EE03 – Town Centres
- EE04a – Education / Edge Hill University
- EE04b – Education / Skills and training

Question	Potential positive health impacts	Potential negative health impacts
<p>Will the proposals have a direct impact on health, mental health and wellbeing?</p> <p><i>For example, would it cause ill-health, affecting social inclusion, independence and participation?</i></p>	<p>These policy areas have the potential to improve health by improving employment and education opportunities. Having a suitable job can be a determinant of one's health and wellbeing.</p>	<p>It could be argued that attracting more employment to the Borough could lead to some forms of pollution. However, such effects would be controlled by conditions and other policies (e.g. on air quality).</p> <p>It is more likely that the absence of these policies would have a detrimental impact on the health of West Lancashire's residents. The Council would be less able to manage development in a way that can protect physical and mental health and facilitate improvements.</p>
<p>Will the proposals have an impact on social, economic and environmental living conditions that would indirectly affect health?</p> <p><i>For example, would it affect housing, transport, child development, education, good employment opportunities, green space or climate change?</i></p>	<p>These policy areas have the potential to improve health by improving education and employment opportunities.</p>	<p>As above.</p>

Question	Potential positive health impacts	Potential negative health impacts
<p>Will the proposals affect an individual's ability to improve their own health and wellbeing?</p> <p><i>For example, will it affect their ability to be physically active, choose healthy food, reduce drinking and smoking?</i></p>	<p>These policy areas have the potential to improve health and wellbeing by improving education and employment opportunities.</p>	<p>It is more likely that the absence of policies such as these would have a detrimental impact on the health of West Lancashire's residents. The Council would be less able to manage development in a way that can protect physical and mental health and facilitate improvements.</p>
<p>Will there be a change in demand for or access to health and social care services?</p> <p><i>For example: Primary Care, Hospital Care, Community Services, Mental Health and Social Services?</i></p>	<p>This is unlikely as a direct consequence of these policies.</p>	<p>None.</p>

Environment and Health

- EH01 – Preserving and enhancing the Borough's nature
- EC02 – Landscape and land resources
- EH03 – Flood risk and water resources
- EH04 – Contamination and pollution
- EH05 – Air quality
- EH06 – Green infrastructure and open spaces (4 approaches)
- EH07 – Healthy eating and drinking

Question	Potential positive health impacts	Potential negative health impacts
<p>Will the proposals have a direct impact on health, mental health and wellbeing?</p> <p><i>For example, would it cause ill-health, affecting social inclusion, independence and participation?</i></p>	<p>Access to nature and the outdoors helps improve both physical and mental health, as does access to green infrastructure and open space / leisure facilities. These policy areas will help support opportunities for health improvement.</p> <p>Minimising flood risk means fewer people should be affected by flooding incidents, which can often carry financial and social impacts that can affect health (e.g. higher cost, or no, buildings insurance or the need to temporarily relocate). Policies that consider contamination and pollution and serve to improve and mitigate air quality will also improve the physical health of the Borough's residents.</p>	<p>There is nothing in these policies that would be likely to have any negative health impacts. It is more likely that the absence of these policies would have a detrimental impact on the health of West Lancashire's residents. The Council would be less able to manage development in a way that can protect physical and mental health and facilitate improvements.</p>

Question	Potential positive health impacts	Potential negative health impacts
	<p>The Borough has a relatively high rate of childhood obesity, and higher than average levels of diabetes, COPD and heart disease (source: West Lancashire JSNA), and a policy relating to healthy eating and drinking should help to address unhealthy eating and drinking habits.</p>	
<p>Will the proposals have an impact on social, economic and environmental living conditions that would indirectly affect health?</p> <p><i>For example, would it affect housing, transport, child development, education, good employment opportunities, green space or climate change?</i></p>	<p>The policy areas would help improve social and environmental living conditions, by providing opportunities to improve access to green space, improve air quality, reduce flood risk and reduce obesity / increase healthy eating opportunities.</p>	<p>As above.</p>
<p>Will the proposals affect an individual's ability to improve their own health and wellbeing?</p> <p><i>For example, will it affect their ability to be physically active, choose healthy food, reduce drinking and smoking?</i></p>	<p>The policy areas would help individuals improve their own health and wellbeing by improving opportunities to access the outdoors, be physically active, and choose healthy food (by reducing opportunities for unhealthy food).</p>	<p>As above.</p>
<p>Will there be a change in demand for or access to health and social care services?</p> <p><i>For example: Primary Care, Hospital Care, Community Services, Mental Health and Social Services?</i></p>	<p>Policies supporting environmental improvements and access to green infrastructure and healthier food and drink provide an opportunity to reduce demand or access to health and social care services.</p>	<p>None.</p>

Transport and Infrastructure

- TI01 – Transport network and access
- TI02 – Parking standards and electric vehicle charging points
- TI03 – Digital connectivity
- TI04 – Low carbon and renewable energy
- TI05 – Energy efficiency in new developments
- TI06 – Water efficiency in new residential developments

Question	Potential positive health impacts	Potential negative health impacts
<p>Will the proposals have a direct impact on health, mental health and wellbeing?</p> <p><i>For example, would it cause ill-health, affecting social inclusion, independence and participation?</i></p>	<p>These policy areas promote improvements to physical and active travel, and a reduction in private car usage which can help promote improvements to physical health. The policy areas also consider digital connectivity, to improve social inclusion, and improvements to energy and water efficiencies in new buildings which can reduce occupier costs and address climate injustices. For example, climate change will mean more people will be at risk of extreme temperatures, which building design can help mitigate.</p>	<p>There is nothing in these policies that should have negative health impacts.</p> <p>It is more likely that the absence of these policies would have a detrimental impact on the health of West Lancashire's residents. The Council would be less able to manage development in a way that can protect physical and mental health and facilitate improvements.</p>
<p>Will the proposals have an impact on social, economic and environmental living conditions that would indirectly affect health?</p>	<p>These policy areas will have the potential to deliver positive impacts in respect of improving opportunities for active travel, social inclusion, accessibility and mitigating the impacts of climate change.</p>	<p>As above.</p>

Question	Potential positive health impacts	Potential negative health impacts
<p><i>For example, would it affect housing, transport, child development, education, good employment opportunities, green space or climate change?</i></p>		
<p>Will the proposals affect an individual's ability to improve their own health and wellbeing?</p> <p><i>For example, will it affect their ability to be physically active, choose healthy food, reduce drinking and smoking?</i></p>	<p>The policy areas would help individuals improve their own health and wellbeing, for example by improving opportunities to access active travel.</p>	<p>As above.</p>
<p>Will there be a change in demand for or access to health and social care services?</p> <p><i>For example: Primary Care, Hospital Care, Community Services, Mental Health and Social Services?</i></p>	<p>Unknown.</p>	<p>-</p>

Other Policies

- OT01 – Sequential tests
- OT02 – Viability
- OT03 – Developer contributions

Question	Potential positive health impacts	Potential negative health impacts
<p>Will the proposals have a direct impact on health, mental health and wellbeing?</p> <p><i>For example, would it cause ill-health, affecting social inclusion, independence and participation?</i></p>	<p>These more 'technical' policy areas alone would be unlikely to have direct impacts on health.</p> <p>Developer contributions can help provide green spaces and active travel opportunities but would be subject to the details of the policy which are currently unknown.</p>	<p>These policy areas alone would be unlikely to have direct impacts on health.</p> <p>The Council will need to work with health and social care services to ensure that infrastructure needs are identified, and this is considered in the development of a developer contributions policy / rate setting.</p>
<p>Will the proposals have an impact on social, economic and environmental living conditions that would indirectly affect health?</p> <p><i>For example, would it affect housing, transport, child development, education, good employment opportunities, green space or climate change?</i></p>	<p>These policy areas alone would be unlikely to have direct impacts on health.</p> <p>Developer contributions can help provide green spaces and active travel opportunities but would be subject to the details of the policy which are currently unknown.</p>	<p>As above.</p>
<p>Will the proposals affect an individual's ability to improve their own health and wellbeing?</p>	<p>These policy areas alone would be unlikely to have direct impacts on health.</p>	<p>As above.</p>

Question	Potential positive health impacts	Potential negative health impacts
<p><i>For example, will it affect their ability to be physically active, choose healthy food, reduce drinking and smoking?</i></p>		
<p>Will there be a change in demand for or access to health and social care services?</p> <p><i>For example: Primary Care, Hospital Care, Community Services, Mental Health and Social Services?</i></p>	<p>These policy areas alone would be unlikely to have direct impacts on health.</p> <p>Developer contributions can help support health services, but this would be subject to the details of the policy which are currently unknown.</p>	<p>The Council will need to work with health and social care services to ensure that infrastructure needs are identified, and this is considered in the development of a developer contributions policy / rate setting.</p>



Data Protection Impact Assessment

October 2021

1. The Proposal

About this Assessment

Title of Project:	West Lancashire Local Plan 2023 – 2040 Scope, Issues & Options Consultation.
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Summary and description of the project:

Context:

We are preparing a new Local Plan for West Lancashire to cover the period 2023-2040. Once adopted, this will supersede the current West Lancashire Local Plan 2012-2027. Preparing a new Local Plan requires a number of consultation events at different stages to ensure we have complied with national regulations relating to the creation of a Local Plan document, and with the West Lancashire Statement of Community Involvement 2020.

This Scope, Issue & Options consultation comes under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Nature:

This consultation seeks to obtain the views and opinions of residents, community representatives, businesses, landowners, developers, neighbouring authorities, 'statutory consultees' and other stakeholders on the content of the new Local Plan. This covers everything from housing provision to nature recovery, transport to the economy, health to climate change. Therefore it is important to ensure that the consultation reaches as many individuals as possible.

Scope:

The consultation intends to reach all residents within West Lancashire as the issues raised within the Local Plan affect everyone. It is our intention to consult using a variety of different methods. However all data and responses will be fed into the 'Bang the Table' software recently procured (September 2021) by West Lancashire Borough Council's Customer Engagement team.

Processing:

The data collected during this consultation will be processed by individual officers and will be used to help undertake consultation for the subsequent stages of Local Plan preparation. Personal data will not be reported upon, but will be used internally to determine which sections of the population of West Lancashire we have managed to reach through the consultation process.

2. DPIA Risk Assessment

High Risk Processing

Does the processing meet the criteria of “high risk” processing?	No
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Comments:

The consultation will use the recently-procured internet-based platform 'Bang the Table' to collate responses from members of the public and interested parties. 'Bang the Table' has built-in data protection measures which align with the GDPR, therefore there is no risk to data from within the consultation software.

The relevant Privacy Notice will be included within the consultation and consent will be required from the respondents, prior to them being able to complete the survey.

3. The Data

Types of Data						
<i>Tick the relevant boxes to indicate the type(s) of data which will be processed:</i>						
Personal	<input checked="" type="checkbox"/>	Special Categories	Religion or beliefs	<input type="checkbox"/>	Criminal Convictions	<input type="checkbox"/>
			Race or ethnic origin	<input type="checkbox"/>		
			Political opinions	<input type="checkbox"/>		
			Trade-union membership	<input type="checkbox"/>		
			Genetic data	<input type="checkbox"/>		
			Health	<input type="checkbox"/>		
			Sex life or orientation	<input type="checkbox"/>		

Categories of Data Subject					
<i>Tick the relevant boxes to indicate the categories(s) of data subject whose data will be processed:</i>					
Customers	<input checked="" type="checkbox"/>	Complainants (& reps)	<input checked="" type="checkbox"/>	Suspected Offenders	<input type="checkbox"/>
Suppliers	<input type="checkbox"/>	Advisors/ Consultants	<input checked="" type="checkbox"/>	Licence/ Permit Holders	<input type="checkbox"/>

Offenders	<input type="checkbox"/>	Benefits Recipients	<input type="checkbox"/>	Inspected Persons	<input type="checkbox"/>
Claimants	<input type="checkbox"/>	Carers (& reps)	<input type="checkbox"/>	Captured on CCTV	<input type="checkbox"/>
Students/ Pupils	<input type="checkbox"/>	Incident witnesses	<input type="checkbox"/>	Employees of other Organisations	<input checked="" type="checkbox"/>
Landlords	<input type="checkbox"/>	Employees/ Contractors	<input type="checkbox"/>	HOLDERS of Public Office	<input checked="" type="checkbox"/>

4. The Principles

A. Processed lawfully, fairly and in a transparent manner

i. Legal basis for processing

Conditions for Processing					
Tick all relevant conditions which provide a legal basis for the processing of personal and special categories data.					
Personal Data			Special Categories		
6(1)(a)	Consent	<input checked="" type="checkbox"/>	9(2)(a)	Explicit Consent	<input type="checkbox"/>
6(1)(b)	Contract	<input type="checkbox"/>	9(2)(b)	Employment, Social Security, Social Protection Law	<input type="checkbox"/>
6(1)(c)	Legal Obligation	<input type="checkbox"/>	9(2)(c)	Vital Interests	<input type="checkbox"/>
	<i>State legislation:</i>				
6(1)(d)	Vital Interests	<input type="checkbox"/>	9(2)(d)	Not-for-profit body	<input type="checkbox"/>
6(1)(e)	Public Interest/ Official Authority	<input type="checkbox"/>	9(2)(e)	Made public	<input type="checkbox"/>
	<i>State legislation:</i>				
6(1)(f)	Legitimate Interests	<input type="checkbox"/>	9(2)(f)	Legal Claim	<input type="checkbox"/>
			9(2)(g)	Substantial Public Interest	<input type="checkbox"/>
			9(2)(h)	Employee Capacity	<input type="checkbox"/>
			9(2)(i)	Public Health	<input type="checkbox"/>
			9(2)(j)	Archiving, Scientific and Historical Research or Statistical Purposes	<input type="checkbox"/>

Consent

If consent is being relied upon, are the relevant conditions in place?

Yes

Comments:

The consultation survey will require consent to be given by the respondent in order for them to be able to submit a response. That consent will be based upon the privacy notice used for all WLBC online consultations.

ii. Rights

The Right to be Informed

Does the processing support this right?

Yes

Comments:

A privacy notice will be made available at the beginning of the consultation.

The Right of Access

Does the processing support this right?

Yes

Comments:

-

The Right to Rectification

Does the processing support this right?

Yes

Comments:

The software to be used to collect and record all responses allows a council employee to rectify any inaccuracies in information submitted by an individual.

The Right to Erasure

Does the processing support this right?

Yes

Comments:

-

The Right to Restrict Processing

Does the processing support this right?

Yes

Comments:

-

The Right to Data Portability

Does the processing support this right?

Yes

Comments:

-

The Right to Object

Does the processing support this right?

Yes

Comments:

-

Rights related to Automated Decision Making and Profiling

Does the processing support this right?

Yes

Comments:

-

iii. Consultation

Describe any consultation with Data Subjects over appropriate processing of personal data

Has any consultation been undertaken with Data Subjects?

No

Comments:

It is not possible to determine who the data subjects will be in order to consult with them regarding the handling of the data. The consultation is open to all residents, and those living outside of West Lancashire, and we cannot predict beforehand who may / may not submit representations on the plan.

B. Collected for specified, explicit and legitimate purposes

State the purpose(s) for which personal data is being obtained

Purpose 1 To allow us to identify where respondents live within West Lancashire.

Purpose 2 To ensure we are able to notify them of the next stage of Local Plan preparation.

Purpose 3 To ensure we are able to contact them to discuss points made in their representations, where required (e.g. a landowner who has submitted their land as a potential development site).

Further Processing

Is any further use to be made of the data?

No

Comments:

-

C. Adequate, relevant and limited

Minimising Personal Data

Confirm that the personal data being obtained is a minimal amount necessary to fulfil the purposes at B above

Yes

Confirm if any pseudonymisation or anonymisation processes will take place, and if so, describe them below	No
Comments:	
-	

D. Accurate and, where necessary, kept up to date

Accuracy	
Confirm that there is a process in place for ensuring that personal data is accurate and reviewed where necessary	Yes
Comments:	
<p>We envisage contacting representors on a reasonably regular basis as the Local Plan is prepared. Any 'undeliverable' email responses will be noted, and any details provided to us (e.g. if a particular representor (e.g. an agent) has been replaced by another person), we will either update our records, or ask the new person to submit their details to us for the purposes of preparing the Local Plan.</p>	

E. Kept no longer than is necessary

Retention	
Retention of personal data will be effectively managed and is aligned to the Council's Retention & Disposal Schedule	Yes
List the relevant Retention Period(s):	
<p>Personal details of representors will be kept until the new Local Plan is adopted and then deleted as per the Retention & Disposal Schedule. For landowners / submitters of sites that end up being allocated as development sites, we will retain their details until the site is developed.</p>	
Comments:	
-	

F. Appropriate security

i. Organisational Controls

Contractual Control	
The contract contains the Council's standard contract clauses at PPN28?	N/A
Comments:	
N/A	

Contractual Term:			
Start Date:		End Date:	
Optional extension period:			

Training	
Confirm that employees (and users where relevant) of the system will receive appropriate training:	Yes / No
Confirm that comprehensive written guidance will be available to employees and users:	Yes / No
Comments:	
N/A	

ii. Technical Controls

Access	
Confirm that the access controls in place will effectively ensure that only those with a valid need to access the data can do so:	Yes
Confirm that the access controls in place will allow assignment and reviews of appropriate permissions to view, create, amend and delete data:	Yes

Comments:

Access controls are in place within the software which restrict access to specific users. Those users are within the Strategic Planning, Regeneration and Implementation Team and the Customer Engagement Team.

Security at Rest

Confirm that appropriate technical security is in place to protect the data at rest from threats appropriate to the security classification of the data:

Yes

Comments:

The software 'Bang the Table' has the necessary technical security which will ensure the data is safe.

Security in Transit

Confirm that appropriate technical security is in place to protect the data in transit from threats appropriate to the security classification of the data:

Yes

Comments:

The data will be held within the 'Bang the Table' software. It will also be held on file within the 'G Drive' on the Council's secure server.

5. Non-EU Transfers

Transfer of Personal Data to Third Countries

No personal data is anticipated being transferred to third countries:

There is an expectation that it may be necessary to transfer personal data to third countries and this activity will meet the required criteria in law (comment below):

Comments:

-

6. Risk Management

Title	Potential Effect	Internal Controls	Likelihood	Impact	Current Risk Assessment & Score
Disclosure of respondents' personal details (names, email addresses)	People's personal email addresses could be made available to third parties. Disclosure of names would lead to individuals being identified. Both would be a breach of their privacy.	Personal details are entered onto the 'Bang the Table' software either by respondents, or by WLBC officers (if a paper response is received). 'Bang the Table' has its own controls / safeguards to prevent disclosure of personal details. WLBC officers are trained in data protection matters.	1	2	2

7. Reviews

Regularity of Reviews	
The processing does not meet the criteria requiring a review:	<input checked="" type="checkbox"/>
A timetable for reviewing the processing has been identified, taking into account the intended length of the activity and the risk rating:	<input type="checkbox"/>
Comments:	
-	


Review One	
Where items below cannot be ticked, explain why in the comments and explain what action is to be taken	
Date Review Undertaken:	
Confirm that the processing as initially approved in this assessment remains unchanged	<input type="checkbox"/>

All mitigations remain in place and are effective and appropriate to the level of risk	<input type="checkbox"/>
No further action is required as a result of the review	<input type="checkbox"/>
Comments:	
-	
Reviewer	
Name:	
Role:	
Signature:	

8. Approvals

Assessment carried out by:	
Name:	Grace Wilson
Role:	Planning Officer
Telephone:	01695 585284
Email:	Grace.wilson@westlancs.gov.uk
Signature:	<i>Grace Wilson</i>
Date	6/10/21

Assessment approved by:	
Name:	Nesan Thirunesan
Role:	Data Protection Officer
Telephone:	01695 583226
Email:	Nesan.thirunesan@westlancs.gov.uk

Signature:	
Date:	08/10/21

Equality Impact Assessment Form



Directorate: Place & Community	Service: Growth & Development
Completed by: Helen Hatch	Date: 5/10/2021
Subject Title: LOCAL PLAN 2023-2040 – PROPOSED CONSULTATION ON ISSUES AND OPTIONS	
1. DESCRIPTION	
Is a policy or strategy being produced or revised:	Yes This proposed consultation marks the first step in producing a new Local Plan for West Lancashire, which will ultimately guide development across the Borough until 2040.
Is a service being designed, redesigned or cut back:	No
Is a commissioning plan or contract specification being developed:	No
Is a budget being set or funding allocated:	No
Is a programme or project being planned:	No
Are recommendations being presented to senior managers and/or Councillors:	Yes The report includes recommendations for the consultation approaches that are proposed to be undertaken.
Does the activity contribute to meeting our duties under the Equality Act 2010 and Public Sector Equality Duty (Eliminating unlawful discrimination / harassment, advancing equality of opportunity, fostering good relations):	Yes
Details of the matter under consideration:	Proposals for public consultation on the Scope and Issues & Options for the emerging Local Plan 2040
<p><i>If you answered Yes to any of the above go straight to Section 3</i></p> <p><i>If you answered No to all the above please complete Section 2</i></p>	
2. RELEVANCE	
Does the work being carried out impact on service users, staff or Councillors (stakeholders):	n/a
If Yes , provide details of how this impacts on service users, staff or Councillors (stakeholders): <i>If you answered Yes go to Section 3</i>	n/a

<p>If you answered No to both Sections 1 and 2 provide details of why there is no impact on these three groups:</p> <p><i>You do not need to complete the rest of this form.</i></p>	<p>n/a</p>
<p>3. EVIDENCE COLLECTION</p>	
<p>Who does the work being carried out impact on, i.e. who is/are the stakeholder(s)?</p>	<p>A new Local Plan will ultimately, directly or indirectly, affect all stakeholders in West Lancashire, including residents, businesses and other organisations.</p>
<p>If the work being carried out relates to a universal service, who needs or uses it most? (Is there any particular group affected more than others)?</p>	<p>n/a</p>
<p>Which of the protected characteristics are most relevant to the work being carried out?</p> <p>Age</p> <p>Gender</p> <p>Disability</p> <p>Race and Culture</p> <p>Sexual Orientation</p> <p>Religion or Belief</p> <p>Gender Reassignment</p> <p>Marriage and Civil Partnership</p> <p>Pregnancy and Maternity</p>	<p>Yes</p> <p>No</p> <p>Yes</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>The consultation is open to all. In designing the consultation, officers have considered how to best ensure all groups may be reached, for example providing large print text (on request) or trying to reach different age groups.</p>
<p>4. DATA ANALYSIS</p>	
<p>In relation to the work being carried out, and the service/function in question, who is actually or currently using the service and why?</p>	<p>The Local Plan provides policy that is used to determine planning applications and provides strategy that guides the delivery of new infrastructure and new development across West Lancashire. All should be able to participate in the public consultation being proposed.</p>
<p>What will the impact of the work being carried out be on usage/the stakeholders?</p>	<p>The impact of a new Local Plan cannot currently be assessed as it is too early in the preparation of the document. The proposed consultation will have no impact on stakeholders other than inviting them to engage in the preparation of a new Local Plan.</p>

What are people's views about the services? Are some customers more satisfied than others, and if so what are the reasons? Can these be affected by the proposals?	People's views on the Local Plan in general will depend upon how directly they are affected by allocation of sites for new development, or by specific policies where they wish to deliver new development. These views may well be affected by proposals in a new Local Plan but it is too early in the process to assess this. This consultation looks at the scope, issues and options in preparing a new Local Plan, rather than presenting any detailed considerations concerned with policies, strategies or land allocations.
What sources of data including consultation results have you used to analyse the impact of the work being carried out on users/stakeholders with protected characteristics?	Guidance provided through the Town and Country Planning Act 1990. Census data and a range of other data have been included in the evidence base that informs the preparation of the Local Plan. The consultation on the Scope, Issues and Options will be used to inform further stages of the Local Plan's preparation.
If any further data/consultation is needed and is to be gathered, please specify:	Cabinet decision is whether to consult or not on the Scope and Issues & Options for the Local Plan 2040.
5. IMPACT OF DECISIONS	
In what way will the changes impact on people with particular protected characteristics (either positively or negatively or in terms of disproportionate impact)?	The decision on whether to consult at this point or not will not have a major impact on people with protected characteristics, although all will be able to engage with the consultation. Indeed, officers have considered the specific needs of some groups and how the consultation can be designed to reach as many people as possible. The Local Plan itself may, in due course, identify impacts on specific groups with particular protected characteristics, for example Travellers and Older Persons.
6. CONSIDERING THE IMPACT	
If there is a negative impact what action can be taken to mitigate it? (If it is not possible or desirable to take actions to reduce the impact, explain why this is the case (e.g. legislative or financial drivers etc.).	There is no impact at this stage
What actions do you plan to take to address any other issues above?	No actions.
7. MONITORING AND REVIEWING	
When will this assessment be reviewed and who will review it?	At each key stage of Local Plan preparation.



**EXECUTIVE OVERVIEW &
SCRUTINY COMMITTEE: 21
October 2021**

CABINET: 2 November 2021

Report of: Corporate Director of Place and Community

Relevant Portfolio Holder: Councillor Gaynar Owen

**Contact for further information: Mr Stephen Benge (Extn. 5274)
(Email: stephen.benge@westlancs.gov.uk)**

**SUBJECT: GREATER MANCHESTER COMBINED AUTHORITY 'PLACES FOR
EVERYONE' STATEMENT OF COMMON GROUND**

Wards affected: Borough wide

1.0 PURPOSE OF THE REPORT

1.1 To seek agreement of a Statement of Common Ground covering cross-boundary spatial planning matters with Greater Manchester Combined Authority partner authorities, as required under the Duty to Co-operate.

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW & SCRUTINY COMMITTEE

2.1 That the Committee consider the content of this report, and the 'Places for Everyone' Statement of Common Ground provided at Appendix A, and that the agreed comments of Executive Overview & Scrutiny Committee be passed to Cabinet for their consideration.

3.0 RECOMMENDATION TO CABINET

3.1 That regard be had to the agreed comments from Executive Overview & Scrutiny Committee (21 October 2021; provided at Appendix B) and the content of the Greater Manchester Combined Authority 'Places for Everyone' Statement of Common Ground provided at Appendix A.

3.2 That the Statement of Common Ground be agreed for signature by the Leader of the Council.

4.0 BACKGROUND

- 4.1 The Localism Act 2011 introduced the Duty to Co-operate (“the Duty”) on local planning authorities which requires each authority to co-operate with neighbouring authorities and with a number of statutory bodies as they prepare their Local Plans (and other Development Plan Documents). This Duty must be evidenced as part of the Local Plan submission for Examination. If the Examining Inspector considers that an authority has not fulfilled the Duty, then he / she can conclude that the Local Plan preparation has not complied with the necessary legal requirements and 'fail' the Local Plan, thus requiring the authority to start preparation all over again.
- 4.2 Even if the Inspector does not fail the Local Plan on legal compliance, the Duty can still be considered when the Inspector assesses whether the Local Plan is 'sound'. If the authority is considered not to have co-operated with neighbouring authorities or the prescribed statutory bodies, or not to have arrived at reasonable decisions based on that co-operation, the Inspector may find the Local Plan unsound. Therefore, fulfilling the Duty is a key requirement of any authority preparing a Local Plan.
- 4.3 The National Planning Policy Framework (NPPF) contains a requirement to help local planning authorities demonstrate that they have fulfilled the Duty:
- In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency. (NPPF, paragraph 27)*
- 4.4 The Greater Manchester Combined Authority, along with the ten local authorities that make up the Greater Manchester area, has been working on a spatial plan for the area for a number of years. In December 2020, Stockport Council withdrew from the process, and the remaining nine authorities have since prepared a new spatial plan for Greater Manchester (minus Stockport), entitled 'Places for Everyone'.
- 4.5 Consultation on the 'Publication' (final draft) version of this 'Places for Everyone' document took place from 9 August to 3 October 2021. West Lancashire Borough Council (WLBC) submitted a formal response to this consultation, expressing the view that the document is 'sound' (as defined by national planning policy), but requesting a minor modification to the text of 'Places for Everyone' so that it acknowledges the proposals for the Skelmersdale Rail Link, in order to help support the case for the proposed scheme.
- 4.6 Officers from the Greater Manchester City Region Combined Authority and the nine local planning authorities involved with 'Places for Everyone' have also prepared a 'Spatial Planning Statement of Common Ground' to cover the Duty to Cooperate, and this is provided at Appendix A. The document sets out how the Combined Authority has engaged with its neighbours in preparing the 'Places for Everyone' plan; the strategic, cross-boundary, planning-related issues; and the current position in the City Region regarding those issues. It identifies future approaches to working together on those issues, where relevant.

- 4.7 The Greater Manchester Combined Authority and its constituent Councils (most notably Wigan, which directly borders West Lancashire) have engaged periodically with WLBC under the Duty over the past few years. To summarise, the following issues have been raised by WLBC during the preparation Places for Everyone (and its preceding draft Greater Manchester Spatial Framework):
- i. West Lancashire cannot help meet Greater Manchester's future needs for office, industry and warehouse growth;
 - ii. WLBC expressed concern over the high levels of economic growth proposed in earlier versions of Places for Everyone; these could drive up demand for housing in this Borough and elsewhere;
 - iii. West Lancashire is unable to accommodate any of Greater Manchester's proposed housing growth;
 - iv. WLBC raised concern that the proposed housing figures in earlier iterations of Places for Everyone did not match the ambitious proposed employment growth and this could lead to more pressure on neighbouring authorities to release more land for housing;
 - v. WLBC raised concerns over the flexibility in housing land supply and recommended that safeguarded land be released for longer-term housing needs and to demonstrate that Green Belt boundaries would not need to be altered at the end of the Plan period;
 - vi. In terms of Green Belt, WLBC made a similar point about flexibility and safeguarded land;
 - vii. WLBC has notified Greater Manchester Combined Authority of its intentions for rail at Skelmersdale, linking both to Merseyside and to Greater Manchester.
- 4.8 In relation to the above points, Greater Manchester Combined Authority's response has been:
- i. Greater Manchester's (i.e. the nine districts of Greater Manchester, excluding Stockport) employment land needs will be met within Greater Manchester's boundaries;
 - ii. The nine 'Greater Manchester' districts consider that the evidence supporting Places for Everyone 2021 now meets WLBC's expressed concerns;
 - iii. Greater Manchester's housing land needs will all be met within Greater Manchester's boundaries;
 - iv. As per the response for (ii), the most up-to-date evidence is considered to meet these concerns;
 - v. There is now a 16% buffer in housing land supply and a safeguarded land policy in 'Places for Everyone';
 - vi. As for (v), there is now a safeguarded land policy;
 - vii. The Statement of Common Ground (paragraph 15.40) acknowledges the proposals for the rail link to Skelmersdale.
- 4.9 In the light of paragraph 4.8 above, it is not considered that there are any unresolved cross-boundary issues between WLBC and our neighbours in Greater Manchester, and it is therefore recommended that the Statement of Common Ground be signed by the Leader of WLBC.
- 4.10 The Statement of Common Ground is an important component of the suite of documents that will be submitted to central government along with the 'Places for

Everyone' development plan document itself, and will be considered as part of the government's independent examination of 'Places for Everyone'.

- 4.11 As well as co-operating with neighbouring Greater Manchester City Region Authorities (in particular, Wigan), WLBC also has a duty to co-operate with neighbouring authorities in Lancashire and in the Liverpool City Region, and continues to do so. In particular, Members will recall the Portfolio Holder for Planning signing the Liverpool City Region Statement of Common Ground in December 2019.

5.0 SUSTAINABILITY IMPLICATIONS

- 5.1 This report has few or no implications for sustainability.

6.0 FINANCIAL AND RESOURCE IMPLICATIONS

- 6.1 There are no financial and resource implications of the Statement of Common Ground other than a small amount of Council officer time.

7.0 RISK ASSESSMENT

- 7.1 There are no risks associated with the recommendations above, although there are risks associated with not contributing to / being a part of such a Statement of Common Ground, as the Council's evidence of fulfilling the Duty to Co-operate would be considerably weaker.

8.0 HEALTH AND WELLBEING IMPLICATIONS

- 8.1 There are no direct implications for health and wellbeing from the recommendations in this report.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

The decision does not have any direct impact on members of the public, employees, elected members and / or stakeholders. Therefore no Equality Impact Assessment is required.

Appendices

Appendix A – Greater Manchester Combined Authority 'Places for Everyone' Statement of Common Ground

For Cabinet meeting only:

Appendix B – Agreed Comments of Executive Overview & Scrutiny Committee
(21 October 2021)

Places for Everyone - Statement of Common Ground August 2021

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1 Co-operation Statement

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

My organisation has no unresolved matters which prevent me from signing.	
My organisation is unable to currently sign the Statement of Common Ground for the reasons set out in the accompanying statement.	
Organisation	
Name	
Position	
Signature	
Date	

Table 1.1 Co-operation Statement

2 Statement of Common Ground

- 2.1** This document is a Statement of Common Ground and is required to support the preparation of the Places for Everyone Publication (Pfe). The Revised National Planning Policy Framework (NPPF) introduced the requirement to record collaborative activities in a statement of common ground. This should be prepared by the strategic-plan making authorities which includes local authorities, Mayors and combined authorities. For a plan to be sound it must be effective, which means deliverable and "based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground" ⁽¹⁾.

1 Para 35 NPPF. February 2019

- 2.2** In 2014 the Association of Greater Manchester Authorities (AGMA) made a decision to prepare a joint plan covering all of the ten Greater Manchester authorities Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan. In the December of 2020 Stockport MBC withdrew from the joint plan making process and the remaining nine authorities continued to prepare a joint plan, which became The Places for Everyone (PfE).
- 2.3** The PfE has a requirement under the Planning and Compulsory Purchase Act to comply with Duty to Co-operate requirements set out in S33A. This sets out who the duty applies to and what the duty entails "to engage constructively, actively and on an ongoing basis" in the process of preparing a development plan document.
- 2.4** The PfE will identify the level and type of growth to be planned and ensure there is an appropriate supply of land to meet this need. There is a requirement to co-operate effectively on strategic priorities that cross boundaries and affect more than one local authority. It is updated at each iteration of the PfE, reflecting the current position on strategic and cross boundary matters of interest to duty to co-operate bodies.
- 2.5** The strategic priorities for the PfE are:
- set out how Greater Manchester (excluding Stockport) should develop up to 2037;
 - identify the amount of new development that will come forward across the PfE Plan, in terms of housing, offices and industry and warehousing, and the main areas in which this will be focused;
 - protect the important environmental assets across the PfE;
 - allocate sites for employment and housing outside the urban area;
 - support the delivery of key infrastructure, such as transport and utilities;
 - define a new Green Belt boundary for the PfE;
 - provide a context for more detailed local plan work.

3 Who needs to co-operate?

Strategic Policy Making Authorities

3.1 The PfE is a Joint Development Plan Document and as such the nine authorities are the "strategic policy making authorities" and agree planning policy through a Joint Committee of the Nine. The main signatories are the nine members of the Joint Committee and the decision to approve and consult on the Publication PfE and submit the PfE to the Secretary of State for consideration is effectively gaining a signature (see Appendix 2 for dates). Any collaborative agreement set out in this document relates to these nine authorities and other relevant duty to co-operate bodies. The PfE shows the distribution of housing, offices and industrial and warehousing across the nine districts which has been agreed through the Joint Committee. Membership of the Joint Committee is made up of:

- Bolton Council
- Bury Council
- Manchester City Council
- Oldham Council
- Rochdale Borough Council
- Salford City Council
- Tameside Metropolitan Borough Council
- Trafford Council
- Wigan Council

Duty to Co-operate Bodies - Additional Signatories

3.2 "Additional signatories" are made up of neighbouring authorities and public bodies. Signatures will be sought from the Publication stage onwards, to allow the fullest collaboration to take place between the key parties. Alongside the PfE a copy of the PfE Statement of Common Ground will be provided and signatures sought. The Joint Committee members must cooperate with the GM Local Enterprise Partnership and GM Local Nature Partnership (Natural Capital Group) and have regard to their activities but these groups are not subject to the requirements of duty to cooperate. The Mayor of Greater Manchester is a "special interest" member of the Joint Committee of the Nine and as such is considered an additional signatory in terms of the PfE Statement of Common Ground.

- 3.3** Up until its decision in December 2020, Stockport MBC was an integral member of the AGMA Executive Committee, responsible for producing the draft GMSF. As such, it contributed to the establishment of a joint evidence base. This Statement of Common Ground seeks to reflect the reset relationship as an additional signatory but also the close relationship Stockport MBC still retains with the Joint Committee districts over planning and cross border matters, not only within GM but beyond. Stockport MBC is still a member of the Greater Manchester Combined Authority, Transport for Greater Manchester, GM Local Enterprise Partnership, GM Local Nature Partnership.
- 3.4** Whilst some local planning authorities such as Cheshire West and Chester are not a neighbouring authority with a contiguous border with the PfE plan authorities, we do recognise that there are some issues that have a wider strategic impact such as minerals and waste and have decided to deal with these as part of the Statement of Common Ground.
- 3.5** The additional signatories are listed below:

The Mayor of Greater Manchester and Neighbouring Authorities

- The Mayor of Greater Manchester
- Blackburn with Darwen Borough Council
- Calderdale Council
- Cheshire East Council
- Chorley Borough Council
- Derbyshire County Council
- High Peak Borough Council
- Kirklees Council
- Lancashire County Council
- Liverpool City Region
- Peak District National Park
- Rossendale Borough Council
- St. Helen's Council
- Stockport Metropolitan Borough Council
- Warrington Council
- West Lancashire Borough Council
- West Yorkshire Combined Authority

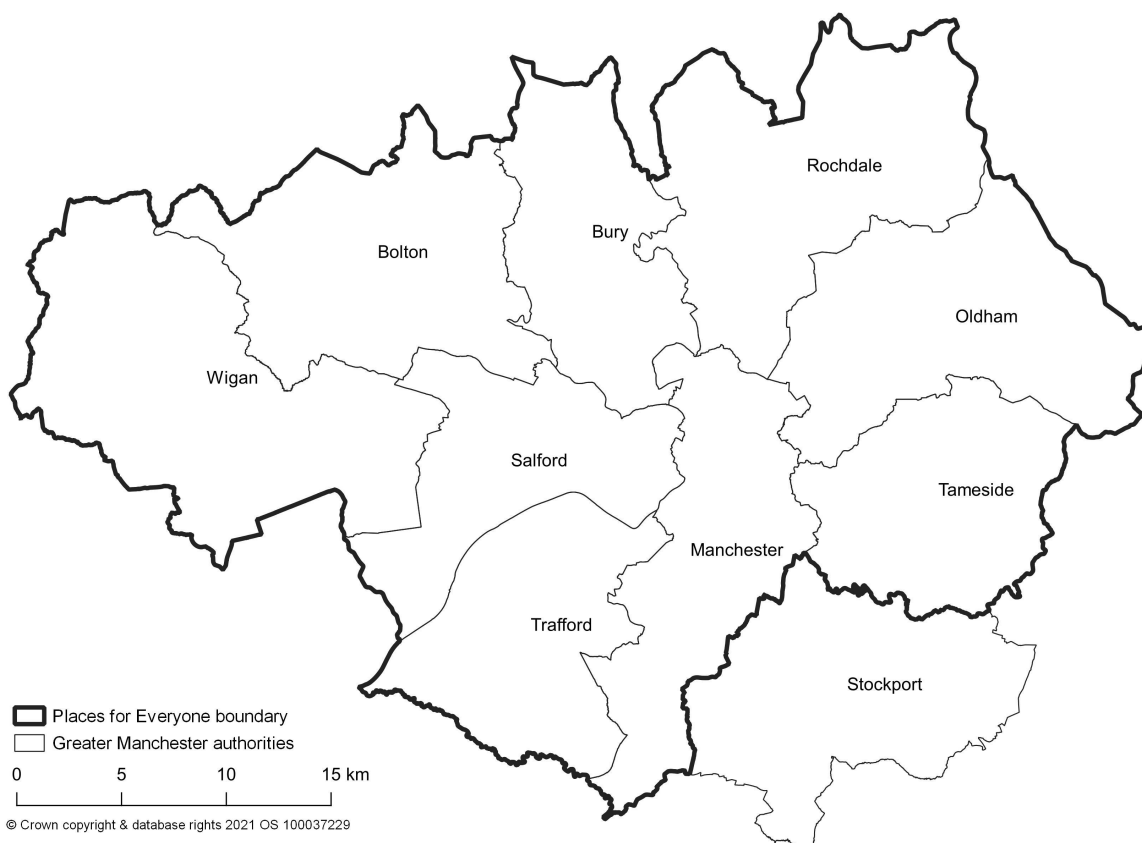
Public Bodies

- The Environment Agency
- Historic England
- Natural England
- The Civil Aviation Authority
- Homes England
- Clinical Commissioning Groups

- National Health Service Commissioning Board
- The Office of Rail Regulation (Network Rail)
- Transport for Greater Manchester
- Highways Authorities
- Highways England
- Local Enterprise Partnership
- Local Nature Partnership

4 Geographical Area

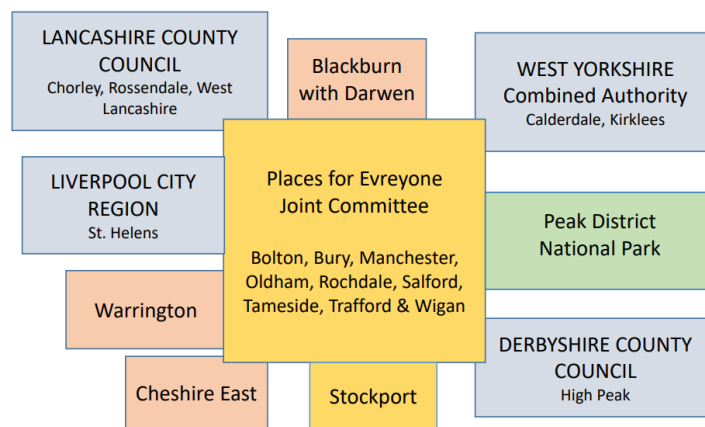
4.1 The area covered by the PfE is shown in the diagram below. The early stages of evidence gathering established Greater Manchester as the correct boundary to consider housing and travel to work areas. Detailed work on what should be the Functional Economic Area was undertaken in 2014 as part of the Objectively Assessed Needs Consultation. The withdrawal of Stockport MBC from the joint development plan process does not negate that they are part of the Greater Manchester housing market area or travel to work area.



Picture 4.1

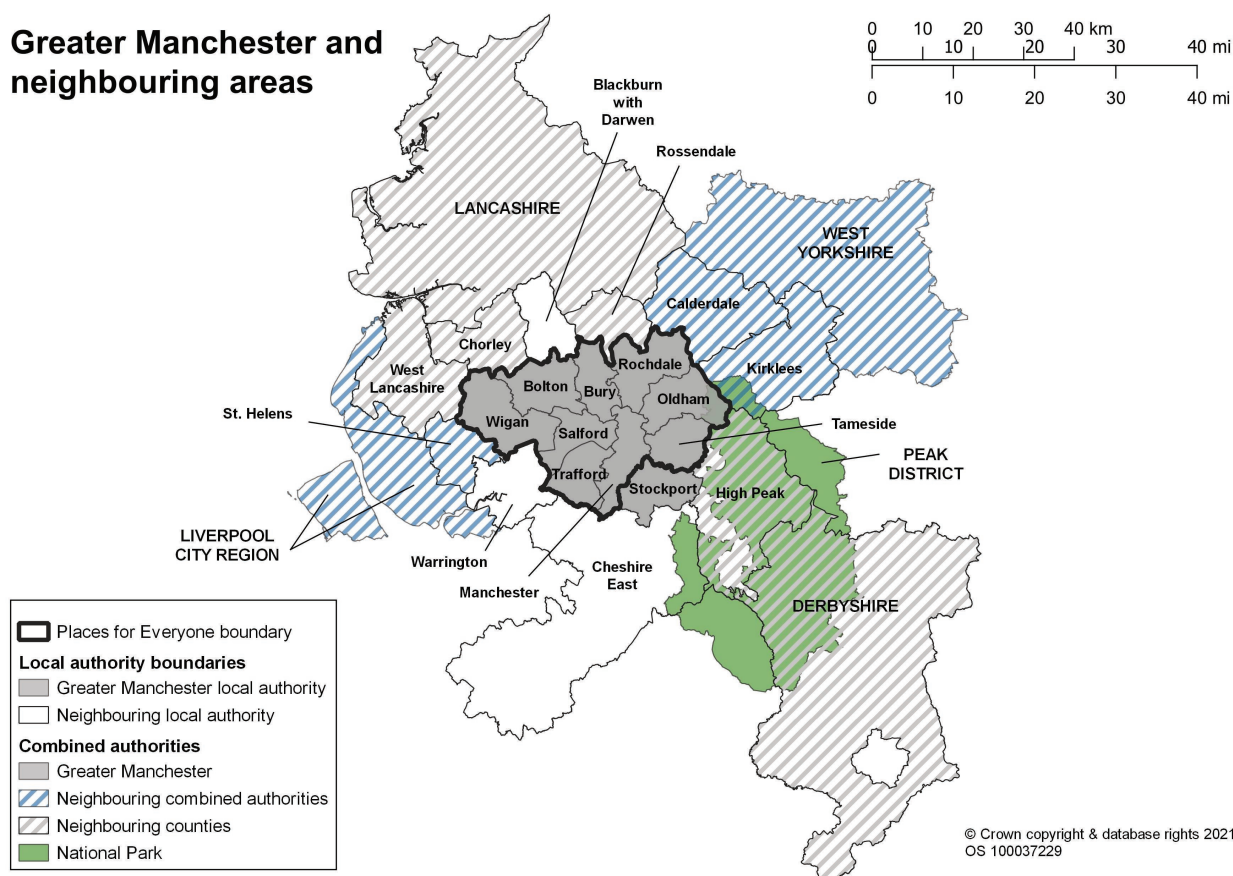
- 4.2 Effective co-operation on cross boundary strategic issues covers those areas outside of Greater Manchester but sharing a border, plus Stockport MBC. Co-operation takes place with the relevant level of local government depending on the issue, this includes city-region, county and local authorities. Public bodies also take an interest in cross boundary matters for example the Environment Agency and flooding.

Places for Everyone and Neighbouring Authorities



Picture 4.2 PfE and Neighbouring Authorities

Greater Manchester and neighbouring areas



Picture 4.3

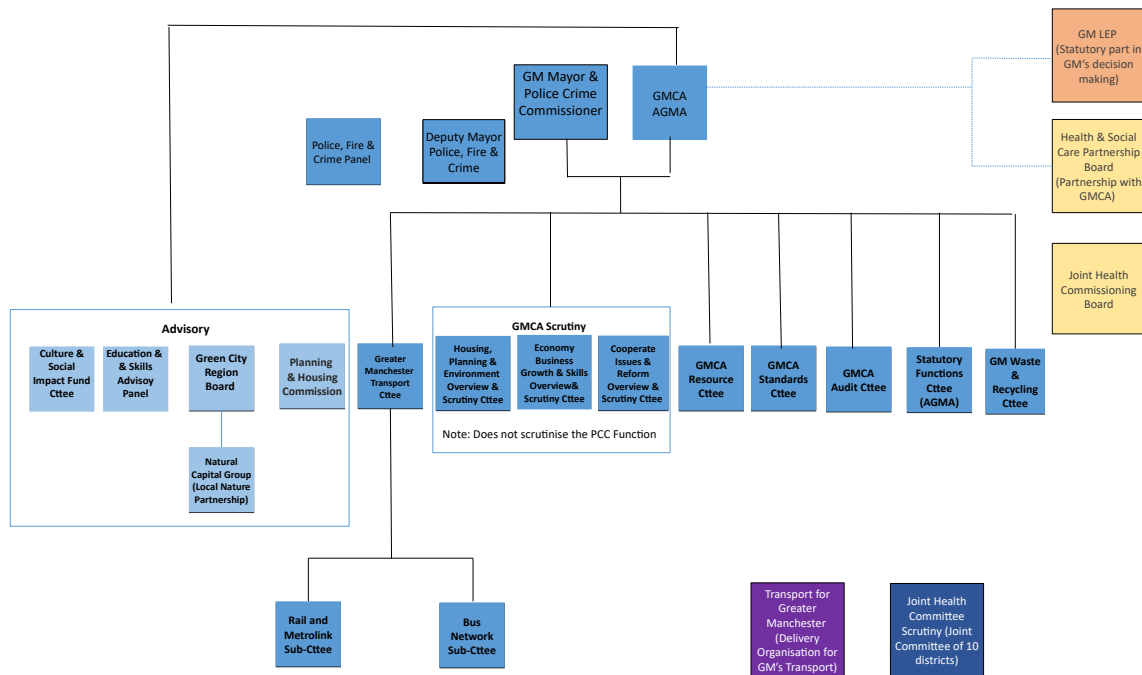
5 Places for Everyone Governance

- 5.1 In November 2014, the AGMA Executive Board recommended to the 10 Greater Manchester local authorities that they agree to prepare a joint Development Plan Document (“Joint DPD”), called the Greater Manchester Spatial Framework (“GMSF”) and that AGMA be appointed by the 10 authorities to prepare the GMSF on their behalf.
- 5.2 The first draft of the GMSF DPD was published for consultation on 31st October 2016, ending on 16th January 2017. Following substantial re-drafting, a further consultation on the Revised Draft GMSF took place between January and March 2019.
- 5.3 On the 30 October 2020 the AGMA Executive Board unanimously agreed to recommend GMSF 2020 to the 10 Greater Manchester Councils for approval for consultation at their Executives/Cabinets, and approval for submission to the Secretary of State following the period for representations at their Council meetings.
- 5.4 At its Council meeting on 3 December Stockport Council resolved not to submit the GMSF 2020 following the consultation period and at its Cabinet meeting on 4 December, it resolved not to publish the GMSF 2020 for consultation.

- 5.5 As a joint DPD of the 10 Greater Manchester authorities, the GMSF 2020 required the approval of all 10 local authorities to proceed. The decisions of Stockport Council/Cabinet therefore signalled the end of the GMSF as a joint plan of the 10.
- 5.6 Notwithstanding the decision of Stockport Council, the nine remaining districts considered that the rationale for the preparation of a Joint DPD remained.
- 5.7 Consequently, at its meeting on the 11th December 2020, Members of the AGMA Executive Committee agreed in principle to producing a joint DPD of the nine remaining Greater Manchester (GM) districts. Subsequent to this meeting, each district formally approved the establishment of a Joint Committee for the preparation of a joint Development Plan Document of the nine districts.
- 5.8 Section 28 of the Planning and Compulsory Purchase Act 2004 and Regulation 32 of the Town and Country Planning (Local Planning) (England) Regulations 2012 enable a joint plan to continue to progress in the event of one of the local authorities withdrawing, provided that the plan has ‘substantially the same effect’ on the remaining authorities as the original joint plan. The joint plan of the nine GM districts has been prepared on this basis.
- 5.9 In view of this, it follows that PfE should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport). Therefore “the plan” and its proposals are in effect one and the same. Its content has changed over time through the iterative process of plan making, but its purpose has not. Consequently, the Plan is proceeding directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.
- 5.10 The PfE Publication Plan was considered at the Joint Committee of the Nine on 20th July 2021 and subsequent approvals followed in the each district (see Appendix 2).

GMCA Governance

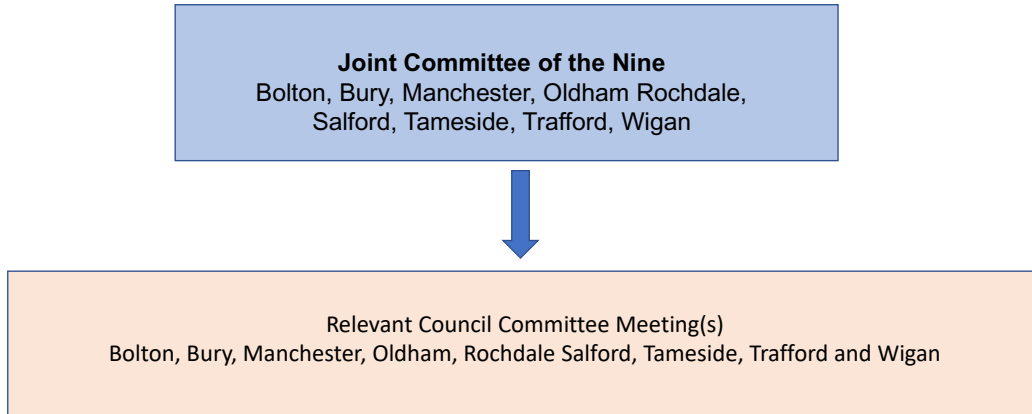
- 5.11 Much of the evidence and studies supporting the PfE has been overseen by Committees/boards within the Greater Manchester Combined Authority governance structure, which has membership made up from local authorities, public bodies and infrastructure providers. This enables effective continued cooperation throughout the preparation of the PfE in terms of both evidence preparation and policy development. The previous iterations of the Plan up to March 2021 were considered and approved through the governance structure set out below. A description of the key committees, boards and commissions which feed into the plan preparation process and agree the document are set out in Appendix 1.



Picture 5.1

Joint Committee of the Nine

5.12 The governance structure since March 2021 is a Joint Committee of the Nine whose membership is the nine districts continuing preparation of a joint plan. This is the approving body for PfE and with approval through the districts own governance arrangements for Publication and Submission stages. The GMCA Governance structure will still be used when relevant for the PfE with all decisions on the document made through the Joint Committee, structure shown below.



Picture 5.2

6 Public Bodies and how they are connected into Place for Everyone Process

Signatories & Additional Signatories	Governance
Joint Committee Members (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan)	<ul style="list-style-type: none"> Joint GMCA/AGMA Executive Board up to December 2020 Joint Committee of the Nine from March 2021
Transport for Greater Manchester	<ul style="list-style-type: none"> Greater Manchester Transport Committee Green City Region Board
Highways Authorities <ul style="list-style-type: none"> Joint Committee Members 	<ul style="list-style-type: none"> Joint GMCA/ AGMA Executive Board to December 2020 Joint Committee of the Nine from March 2021 Greater Manchester Transport Committee Bus Network Sub-Committee Rail & Metrolink Sub-Committee
Natural England	<ul style="list-style-type: none"> Natural Capital Group

Signatories & Additional Signatories	Governance
Homes England	<ul style="list-style-type: none"> • Planning and Housing Commission • One Public Sector Estate
Clinical Commissioning Group's	<ul style="list-style-type: none"> • Greater Manchester Health and Well Being Board
Local Enterprise Partnership	<ul style="list-style-type: none"> • GMCA • GM Local Enterprise Partnership • Green City Region Board
Local Nature Partnership	<ul style="list-style-type: none"> • Green City Region Board

Table 6.1 Duty to Co-operate Bodies and the PfE Process

7 Co-operation Between the Nine Places for Everyone Districts and Stockport

- 7.1** Following Stockport's departure from the joint plan making process there has been a reset to the Duty to Co-operate relationship between the nine PfE districts and Stockport. To assist this, Greater Manchester Mayor Andy Burnham, City Mayor of Salford and GMCA Portfolio Lead for PfE met with Cllr Elise Wilson, Leader of Stockport Council on 14th July to discuss the Duty to Co-operate arrangements, the PfE timetable, Stockport Local Plan timetable and demonstrate continued commitment to collaboration between the PfE districts and Stockport.
- 7.2** A follow up letter dated 26th July 2021 set out the Duty to Co-operate position between the 10 Greater Manchester Districts and this is set out below.

Co-operation Between the 10 Greater Manchester Authorities

- 7.3** In November 2014 the 10 Greater Manchester authorities resolved to prepare a joint development plan document, known as the Greater Manchester Spatial Framework.
- 7.4** The 10 authorities agreed to discharge their duty to co-operate, pursuant to s33A of the Planning and Compulsory Purchase Act 2004 by agreeing to prepare a joint local development document covering housing and employment land requirements including, as appropriate, strategic site allocations and Green Belt boundary amendments and associated infrastructure.
- 7.5** The rationale for a joint plan was the opportunity to support the strategic objectives of Greater Manchester by providing certainty around scale and distribution of development and aligning this with strategic infrastructure plans.
- 7.6** A joint plan was considered essential to underpin the growth ambitions of the 10, as set out in the Greater Manchester Strategy and later in the Local Industrial Strategy.

- 7.7** NPPF applies a presumption in favour of sustainable development (paragraph 11B), which requires strategic policies, as a minimum, to provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (subject to the tests set out in that paragraph). The 10 authorities agreed that a key objective of the plan was to meet their own objectively assessed needs to ensure that ambitious proposals to boost economic performance across the conurbation was matched by a supply of housing of sufficient quality and diversity to meet the needs of all of residents.
- 7.8** The 10 authorities worked together to:
- a. Agree the objectively assessed needs for housing and employment across the plan area
 - b. Identify the existing land supply available for development following an optimisation process
 - c. Agree that there was a shortfall in existing land supply to meet needs
 - d. Engage constructively with neighbouring authorities outside of GM to explore the opportunity for some of our need to be met elsewhere
 - e. Commission an extensive evidence base to underpin and inform the plan, including Transport, Landscape Character assessment, Green Belt Assessment and Green Belt Harm Assessment, SFRA, Viability, Carbon and energy, SHMA
 - f. Following this work it was agreed by the 10 that a limited release of Green Belt land was required to meet needs of the 10 authorities.

Addressing the Shortfall

- 7.9** The starting point for addressing the shortfall was the requirement to support delivery of GM's objectives. In spatial terms this translated into identification of sufficient land to support sustained, sustainable and inclusive growth to ensure that no part of GM was left behind and all residents had the opportunity to benefit in the economic success of the conurbation. The spatial strategy that was developed focused on making the best use of urban/brownfield land and existing transport infrastructure whilst identifying opportunities to spread prosperity to all parts of the city region. The spatial strategy for growth focused on the following :
- i. Strong and continued growth at the conurbation core
 - ii. Focus on regeneration of the inner areas around the conurbation core
 - iii. Boosting the economic performance of the northern districts
 - iv. Sustaining southern competitiveness
 - v. Main Town Centres
 - vi. Rapid Transit routes
- 7.10** Over 1000 sites had been submitted through the Call for Sites process. Clearly not all of these sites were required to meet the shortfall therefore a site selection process was agreed (set out in detail in the Site Selection Background Paper GMSF 2020).

The Site Selection process

- 7.11** The 10 districts collaborated on a Green Belt Assessment. This did not identify any significant locations where the tests of Green Belt were not met.
- 7.12** In order to achieve the principles established by the spatial strategy, it was considered appropriate to establish a number of “rules” when applying the site selection criteria to housing sites. These rules were:
- Each district was encouraged to meet their own local housing need (LHN)
 - Where a single district had sufficient existing land supply to meet its own LHN and where this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt in that district
 - If a single district could not meet their own LHN through their existing land supply there was an expectation that they would need to supplement their land supply through allocations beyond the urban area, to enable them to meet a significant proportion of their own LHN, considered to be at least 70% of its LHN
 - No single district should exceed its LHN by more than 125%
 - Collectively the northern Greater Manchester districts should meet around 100% of their collective LHN, in order to ensure that the overall objective of inclusive growth and boosting the competitiveness of north Greater Manchester would succeed
 - The southern Greater Manchester districts should collectively meet a significant amount of their LHN, in order to achieve inclusive growth across Greater Manchester
- 7.13** Site Selection criteria were developed, informed by NPPF and a number of areas of search were identified where it was considered that the site selection criteria had been met to act as a general guide. Buffers were placed around town centres and public transport hubs and consideration was given to sites (reasonable alternatives) within these locations to increase the supply of land for development. Every district had a number of ‘reasonable alternatives’ to consider.
- 7.14** In terms of employment land, identification of sites was informed primarily by the spatial strategy and the objectives to support strong and continued growth at the core (by focusing the majority of office/commercial development within the core growth areas of Manchester, Salford and Trafford), boost the economic competitiveness of the north (by identifying sites which are transformational in nature and provide for diverse employment opportunities which could not be delivered by the existing land supply) and sustain the competitiveness of the southern area (by taking advantage of global opportunities presented by the airport and the proposed HS2 route).
- 7.15** The outcome of this work was an agreed approach to the scale and distribution of development and a number of housing and employment allocations proposed outside the urban area to bolster the existing land supply and to ensure that the overall Vision and Objectives of the Plan were met.

- 7.16** Housing and employment targets were agreed, accompanied by a land supply buffer to allow for flexibility and choice. The buffer reflected the outcomes of the strategic viability study which identified a significant challenge with the viability of housing land across all districts of Greater Manchester, but with a particular concentration in the northern districts.
- 7.17** Whilst the outcome of the spatial strategy was some individual districts not meeting their LHN and some exceeding theirs, the extent to which districts were meeting need was never a defining factor in determining distribution. No district was identified as having 'unmet' needs as overall Greater Manchester was meeting its collective LHN and supporting the spatial strategy. The fact that Stockport were only meeting 70% of their LHN did not mean that Stockport had 30% unmet need. It was an outcome of the spatial strategy.

DECEMBER 2020 TO PRESENT

- 7.18** The Stockport Council decision to withdraw from the GMSF in December 2020 signalled the end of the joint plan of the 10, and changed the basis on which the 10 districts would co-operate on strategic planning matters in future.
- 7.19** The 9 remaining districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) decided to continue to collaborate on a joint plan. These districts agreed to establish a Joint Committee and they will continue to discharge their duty to co-operate, pursuant to s33A of the Planning and Compulsory Purchase Act 2004 by agreeing to prepare a joint local development document.
- 7.20** Stockport Council is committed to preparing its own local plan.
- 7.21** The Duty to Co-operate arrangements need to be reset and these are necessarily more complex now that Stockport is no longer participating in the joint plan.
- 7.22** Since December the 9 districts have been actively considering the impact of the recent changes to the LHN methodology (introduced in December 2020) which required Manchester City Council to accommodate a 35% uplift over its previous LHN. It is not clear the basis on which this uplift has been applied, it does not relate to population or economic forecasts for the MCC area, therefore this represents a 'redistribution of unmet needs' from elsewhere in the country. Aside from the difficulty of understanding who these homes may be for and what their requirements may be, the 35% uplift resulted in an additional 914 homes per annum, almost 15,000 over the plan period. The guidance also stated that this uplift had to be accommodated in the MCC area.

- 7.23** In March 2021, Stockport Council requested whether the nine districts were still willing to accommodate similar levels of Stockport Council's housing and employment need as in GMSF in PfE. As outlined in paragraph 15 above, the 30% of housing need which Stockport was not accommodating in GMSF 2020 was never identified as an 'unmet' need, it was the outcome of the agreed spatial strategy. Paragraph 11(b) of the NPPF applies a presumption in favour of sustainable development and requires strategic policies to provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, subject to the caveats set out in that paragraph. To the best of our knowledge, Stockport have not yet carried out an assessment of capacity to meet its own needs and have not indicated whether they have unmet need, and until this assessment is carried out it is too early to be able to have conclusive discussions on potential distribution of development needs.
- 7.24** Since March there have been a number of meetings between officers and members representing the 9 districts and Stockport Council. Several issues were agreed to be needing further engagement and discussion:
- Timescales for plan preparation of the PfE and the Stockport Local Plan
 - The extent to which Stockport Council supports the thematic policies in the plan, in particular Chapter 3, The Vision and Strategic Objectives and Chapter 4, Strategy (most notably) the section on 'southern competitiveness' within this Chapter;
 - Timescales to share the Vision, Strategic Objectives and spatial strategy of the Stockport Local Plan;
 - Proposed scale and distribution of development to deliver that strategy;
 - Approach to identifying land and an assessment of the extent to which Stockport can meet its own development needs
 - Identified shortfall (if any)
 - The extent to which Stockport Council supports the evidence base underpinning Places for Everyone and intends to utilise this as part of its own local plan.
- 7.25** The timetable for Places for Everyone, anticipates a consultation on a Regulation 19 plan anticipated in August 2021, Submission January 2022 and Examination and Adoption by 2023. Papers to begin the process are scheduled to be published on 12 July 2021. At this point in time, the 9 districts do not have an evidenced understanding of what the Stockport land supply position is, and the assumptions underpinning Stockport's assessment of it.
- 7.26** Stockport is intending to consult on a Regulation 18 (Issues and Options) in Summer 2021.
- 7.27** In the light of this, the districts are seeking to agree a process for future engagement between Stockport Council and the other nine districts regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone.

8 Collaboration

- 8.1 From the early stages of preparing a joint plan, key pieces of evidence and policy development have been shared with neighbouring authorities and advisory bodies. Some evidence has been shared as far back as 2013, for example the Strategic Housing Market methodology. The GMCA Boards and Commissions have considered much of the evidence supporting PfE Plan and some of the key studies have had direct involvement from advisory bodies.
- 8.2 The duty to co-operate bodies have commented on various stages of the Plan, including the Draft 2019 GMSF. A summary is provided in the PfE Duty to Co-operate Statement.
- 8.3 Detailed collaborative work on allocations is on the whole dealt with by districts and not covered in this Statement of Common Ground.
- 8.4 Significant effort has been given to duty to co-operate and many collaborative activities have taken place throughout the preparation of the Plan. Key activities include:
- AGMA Joint Committee to December 2020 and Joint Committee of the Nine March 2021 onwards;
 - Collaboration with Stockport MBC following their departure from the joint plan making process;
 - Neighbouring authorities were invited to meet with PfE representatives to update them on PfE timescale and evidence base following Stockport's departure;
 - September 2020, meetings to discuss the joint plan timetable, the approach to transport evidence and other duty to co-operate matters, in attendance were all neighbouring authorities, the Joint Committee Members, representatives of PfE and TfGM;
 - January 2019, a Statement of Common Ground event was held bringing together the GMCA, GM authorities, neighbouring authorities, advisory bodies and infrastructure providers. An update on the Revised GMSF 2019 was provided followed by meetings with individual authorities to discuss issues of concern;
 - During preparation of the Draft GMSF 2016, Revised Draft GMSF 2019, Publication GMSF (abandoned) and PfE Publication Plan 2021 neighbouring authorities were contacted to ask if they would consider accommodating any of Places for Everyone's housing or employment growth.
 - Joint working continued with Environment Agency, Natural England, Historic England and Highways England on various aspects of the strategic evidence base following the consultation ending on the Revised Draft GMSF 2019.
 - Joint meetings were undertaken between each district within PfE and the Environment Agency, Natural England and United Utilities between 2017 and early 2018 on the emerging evidence base and concept planning for each allocation.

- St. Helens, Warrington, Wigan and GMCA have been collaborating since 2017 on the impact of Port Liverpool on the proposed M6 Junction 23 Feasibility Study funded by Liverpool City Region Single Investment Fund.
- A round of presentations at the start of the joint plan making process looking at commuting patterns between PfE districts and neighbouring authorities.

8.5 At each stage collaboration has taken place and this is summarised in the Duty to Co-operate Statement and Log of Collaboration appendices. It covers:

- Formative Proposals for a Greater Manchester Spatial Framework (March 2013 to November 2014)
- Vision, Objectives and Strategic Growth Options for the Greater Manchester Spatial Framework (December 2014 to January 2016)
- First draft of the Greater Manchester Spatial Framework (February 2016 to January 2017)
- Greater Manchester's Plan for Homes, Jobs and the Environment Revised Draft of the Greater Manchester Spatial Framework (February 2017 to March 2019)
- Greater Manchester's Plan for Homes, Jobs and the Environment Publication Draft of the Greater Manchester Spatial Framework (April 2019 to December 2020)
- Places for Everyone Publication Publication Plan (January 2021 to Summer 2021)

8.6 As the Places for Everyone Plan progresses, a further iteration of the Statement of Common Ground will be prepared, documenting continued collaborative working.

9 Strategy

Greater Manchester Strategy

- 9.1** The PfE is the spatial representation of the Greater Manchester Strategy, as it relates to the nine districts of the Joint Committee and supports its delivery.
- 9.2** The Greater Manchester Strategy outlines plans for the future of the city region in the areas of health, wellbeing, work and jobs, housing, transport, skills, training and economic growth. It is a strategy for everyone in Greater Manchester - residents, the voluntary, community and social enterprise sector, businesses and civic leaders.
- 9.3** A key aspect of delivery in the Greater Manchester Strategy is continued co-operation and partnership working across organisations. The Greater Manchester Strategy acknowledges the strengths of the city region but also the challenges related to realising the full potential of Greater Manchester's residents. The vision in the Greater Manchester Strategy is also the vision in PfE, ensuring both documents share the same priorities.

- 9.4** The strategy for achieving this vision is structured around 10 priorities, reflecting the life journey:
1. Children starting school ready to learn;
 2. Young people equipped for life;
 3. Good jobs, with opportunities for people to progress and develop;
 4. A thriving and productive economy in all parts of Greater Manchester;
 5. World-class connectivity that keeps Greater Manchester moving;
 6. Safe, decent and affordable housing;
 7. A green city-region and a high quality culture and leisure offer for all;
 8. Safer and stronger communities;
 9. Healthy lives, with quality care available for those that need it;
 10. An age-friendly city-region.
- 9.5** The Places for Everyone Plan will contribute to delivering these priorities and will have a greater role in some than in others, but is mindful of them all.

Duty to Co-operate Comments

- 9.6** At an early stage of the PfE plan the Environment Agency suggested the GMS Vision should be the Vision for PfE. The GMS Vision and PfE Vision are now one and the same confirming the role of the PfE as the spatial representation of the GMS. Other Duty to Co-operate bodies such as Historic England have considered there should be scope for amending the vision.

Greater Manchester Strategic Housing Market Assessment

- 9.7** The strategic housing market assessment (SHMA) has been prepared by the GMCA on behalf of the ten GM authorities. It seeks to present a clear, evidenced picture of the Greater Manchester housing market and how it is changing, to provide an assessment of future needs for both market and affordable housing and to explore the housing needs of different groups within the population over the plan period.
- 9.8** Greater Manchester is a large and diverse city region which, while well connected to our neighbours, can reasonably be defined as a housing market for planning purposes. More than four out of five households who move into a home in Greater Manchester already live here. Nearly nine in ten working people who live in Greater Manchester also work here and of Greater Manchester residents who work here, two fifths travel to another district for work, showing how interconnected we are as a city region.

Greater Manchester Industrial Strategy

- 9.9** Greater Manchester’s Local Industrial Strategy is designed to deliver an economy fit for the future, with prosperous communities across the city-region and radically increased productivity and earning power. The Local Industrial Strategy represents a strong partnership between local leaders and government, setting out an ambitious plan to achieve the aspirations of the National Industrial Strategy and to continue to contribute to Greater Manchester’s prosperity.
- 9.10** A key aspect of the GM Industrial Strategy is the delivery of infrastructure and the identification of growth opportunities. New strategic sites for manufacturing activity have been identified in the Plan, which will provide a step-change in the market offer for industrial sites and provide space for the large-scale production and manufacturing of advanced materials.

Places for Everyone Publication Plan 2021

- 9.11** The strategies above have informed the spatial strategy in the PfE Publication Plan. It focuses significant growth in the core, boosts competitiveness in the north and sustains growth in the south. The overall housing, office and industry and warehousing provision planned for in the Publication Plan is set out below.

	Requirement 2021-37	Land Supply 2021-37
Housing	164,880 (10,305pa)	190,776 units
Offices	1,900,000 sqm	3,150,763 sqm
Industry & Warehousing	3,330,000sqm	3,960,389 sqm

Table 9.1 PfE Housing, Office and Industry & Warehousing provision

10 Sustainable & Resilient Places

Flooding

- 10.1** Greater Manchester Combined Authority (GMCA) commissioned JBA Consulting (JBA) in June 2017 to undertake a Level 1 Strategic Flood Risk Assessment (SFRA) and develop a Strategic Flood Risk Management Framework (SFRMF) to cover the ten Greater Manchester local authorities making up GMCA. National policy requires this Level 1 and Level 2 SFRA and SFRMF to inform the PfE and local plans for the local planning authorities.

- 10.2** The purpose of the GM SFRMF is to provide a spatial framework for FRM across Greater Manchester, highlighting the key strategic flood risks including cross-boundary issues within and outside Greater Manchester and recommending key priorities for intervention taking account of previous, existing and planned interventions delivered by Risk Management Authorities (RMAs).
- 10.3** The Framework is high level and focused on the management of those flood risk issues that are of importance to the Manchester City Region, as a whole, and that have the potential to contribute to or affect its economic, social and environmental sustainability. Subsequently it highlights flood risk issues that cross local authority and City Region boundaries. As a result, there may be local FRM issues that, whilst important to local economies and communities, are not highlighted as they are better addressed at the local authority level via the LPA or lead local flood authority (LLFA). GMCA's constituent LAs are all unitary authorities and therefore hold both LPA and LLFA functions.
- 10.4** The Strategic Flood Risk Assessment (SFRA) Level 1, identifies the existing and future strategic flood risk: rivers, surface water, sewer, Groundwater and Environment Agency Source Protection Zones, canals and reservoirs. It also identified future risk including from Climate Change and examined the proposed development sites and flood risk. It states there are potentially multiple cumulative, cross-boundary impacts within Greater Manchester and with adjacent local planning authorities outside of the City Region and these are set out in the report.
- 10.5** Following the Level 1 SFRA a Level 2 SFRA has been prepared looking at future assessments of need to show that exception tests can be applied appropriately and to justify the quantum of development. The Level 1 SFRA identified gaps in understanding of future climate change impacts and this extra work was also picked up for the sites assessed in the SFRA Level 2 work.
- 10.6** The Level 2 SFRA was undertaken by JBA consulting and covered Exception Test Reports, Flood Risk Reviews, Flow Models, Opportunity Areas for Safeguarding Land for Flood Risk Management, and a methodology to update locally defined Critical Drainage Areas.
- 10.7** The Environment Agency have been involved throughout the preparation of this work alongside GM districts and the GMCA. To help complete the GM level 1 and Level 2 Strategic Flood Risk Assessments, the GMCA engaged the Environment Agency for advice on a regular basis between 2018 and 2021. As such, the Environment Agency were members of the Steering Group for the GM level 1 and Level 2 Strategic Flood Risk Assessments and weekly 'keep in touch' meetings were held. The EA also provided technical flood risk advice for the GM Level 2 Strategic Flood Risk Assessment on some proposed allocations over 2019 and 2020 including Chew Brook Vale in Oldham, East of Boothstown in Salford and Elton Reservoir in Bury. The GMCA and EA continue to have weekly catch-up meetings to discuss water related planning matters.

- 10.8** As required by the National Planning Policy Framework, the Strategic Flood Risk Assessment Reports (Level 1 and 2) have provided the baseline evidence with regards to all sources of flood risk and application of the Sequential and Exception Test. Outside of this, a number of districts/site promoters have also commissioned further site appraisal work to address any remaining Exception Test matters and SFRA recommendations. The districts have engaged with the Environment Agency on the additional information to ensure it meets statutory requirements. The sites include Land East of Boothstown, Elton Reservoir and Chew Brook Vale (Robert Fletchers).
- 10.9** The PfE JP-S 5 Flood Risk and the Water Environment has been amended to reflect the latest evidence from the Level 2 SFRA, plus relevant allocations in the plan reference flood risk mitigation in more detail. The location of new development in the Plan area has been informed by the application of Sequential Test and Exception Test, as required by national planning policy. The aim of the tests are to steer new development towards areas with the lowest risk of flooding first before considering higher risk locations.
- 10.10** The North West River Basin Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment across Greater Manchester and beyond. It sets out legally binding objectives for the quality of water bodies, with the default being that they should be classified as ‘good’ overall based on their ecological status or potential and their chemical status.

Duty to Co-operate Bodies

- 10.11** In response the Revised Draft Plan in 2019 the Environment Agency raised concerns about the need for flood risk evidence to support the PfE plan. They supported the preparation of the Level 1 SFRA that identified the strategic allocations and sites within the existing land supply requiring the application of the Exception Test. They stated the Level 2 SFRA was required to show that exception tests can be applied appropriately and to justify the quantum of development. They also stated Level 1 SRFA identified gaps in understanding of future climate change impacts and this additional work should form part of the Level 2 SFRA work. The PfE districts consider that the evidence supporting PfE 2021 now meets these concerns.

PfE Statement of Common Ground 1

Flood Risk and the Water Environment

The PfE policies and proposals especially Policy JP-S5 Flood Risk and the Water Environment, A Green Places and relevant allocations have been informed by the SFRA Level 1 and 2 and provide a sound basis to deal with any river catchment issues which may affect flooding potential in the future within the PfE area and any cross boundary issues.

The PfE and supporting evidence provide the basis for the PfE districts to collaborate with relevant neighbouring lead local flood authorities, risk management authorities and public bodies including the Environment Agency, United Utilities and relevant cross boundary neighbouring councils on any river catchment issues which may affect flooding potential in the future.

Relevant neighbouring lead local flood authorities and risk management authorities include Blackburn with Darwen Borough Council, Calderdale Council, Cheshire East Council, Chorley Borough Council, Derbyshire County Council, High Peak Borough Council, Kirklees Council, Lancashire County Council, Rossendale Borough Council, St. Helen's Council, Stockport Metropolitan Borough Council, Warrington Council and West Lancashire Borough Council.

The preparation of flood and water management policies in the PfE meets the duty to co-operate requirements.

Minerals and Waste

- 10.12** The Greater Manchester Joint Minerals Plan was adopted in April 2013. Annual monitoring of minerals extraction and changes future needs will inform whether and when an update of the joint minerals plan is required, especially as a result of the growth set out in this plan.
- 10.13** The Greater Manchester Joint Waste Development Plan was adopted in April 2012. Annual monitoring of waste facility capacity and changes in future needs will inform whether and when an update of the joint waste plan is required, including as a result of the growth set out in this plan.

PfE Statement of Common Ground 2

Minerals & Waste

The PfE districts will collaborate with adjoining neighbouring districts on any revision to the Greater Manchester Joint Minerals Plan and any revision to the Greater Manchester Joint Waste Development Plan. Further consideration of this issue will follow the Submission stage of the PfE. Relevant neighbouring authorities in relation to minerals and waste include Blackburn with Darwin Borough Council, Calderdale Council, Cheshire East Council, Cheshire West and Chester, Chorley Borough Council, Derbyshire County Council, High Peak Borough Council, Kirklees Council, Lancashire County Council, Liverpool City-Region, Rossendale Borough Council, St. Helen's Council, Stockport MBC, Warrington Council and West Lancashire Borough Council.

11 Places for Jobs

- 11.1 Beyond the NPPF, the approach to economic policies in the Places for Everyone Plan has been informed by a variety of evidence and strategies. National strategies have informed economic objectives in the plan including Government commitments and policies around infrastructure, skills, innovation, levelling up the whole of the UK, supporting the transition to a net zero economy and developing the vision for Global Britain.
- 11.2 Since 2014 economic strategies covering Greater Manchester have been prepared by the Greater Manchester Combined Authority to help drive economic growth in the region, encouraging and building on business and research innovation; considering the infrastructure needs to drive business and job growth, identifying sectoral strengths and skills gaps and prioritising investment decision. In addition, evidence supporting the PfE has been prepared complementing the wider strategies and meeting the requirements of the NPPF and NPPG, local strategies, PfE objectives and in response to comments during consultation stages, including from Duty to Co-operate bodies. As evidence emerged it has been shared at the relevant plan stage, as part of the consultation material including with duty to co-operate bodies. The key studies include:
- Good Jobs and Growth - GM Local Industrial Strategy
 - Greater Manchester Strategy
 - Note on Covid-19, EU- Exit and the GM Economy
 - GM Employment Land Need for Greater Manchester
 - GM Employment Land Supply
- 11.3 The evidence base supporting the PfE has been reviewed following Stockport's decision to prepare their own plan, addendum's have been added where appropriate and should be read alongside the existing evidence base. Within the PfE 2021 employment distribution supports the Greater Manchester Strategy and the Spatial Strategy seeking to focus growth in the core, boost competitiveness in the north of the conurbation and sustain southern competitiveness. The PfE employment land targets have been reduced to remove Stockport's provision.
- 11.4 Key evidence for the PfE policies includes:
- Employment Land Need for Greater Manchester - Work has been undertaken to assess past employment land take-up (or 'completions') in order to consider the future employment land needs of the nine districts for business (offices) and industrial (i.e. manufacturing and distribution), for the 16 years up to 2037.

- Covid-19, Brexit and the Greater Manchester Economy - this examined the economic impacts of Covid-19, the new trading agreement between the UK and EU and the implications for economic growth in GM.
- GM Employment Land Supply - this assesses the supply of employment land against employment floorspace requirements. Each of the nine districts carried out their own assessment of employment land availability. The PfE ELS brings together information from each of the nine districts to identify the total employment land supply across the plan area.

Duty to Co-operate Comments From Revised GMSF 2019

- 11.5** High Peak Borough Council and West Lancashire have expressed concerns about the high levels of economic growth proposed in the PfE plan driving up demand for housing in their boroughs. The PfE districts now consider that evidence supporting PfE 2021 now meets these concerns.

Offices

- 11.6** The PfE 2021 employment land requirement for offices to 2037 is 1,900,000sqm, this is derived from the past employment take up rates. It recognises the existing focus for offices will largely continue to 2037, this includes the City Centre, The Quays, Manchester Airport Enterprise Zone and Town Centres. There is a small area of green belt release proposed to accommodate office growth within Manchester Airport Enterprise Zone.
- 11.7** Within PfE 2021 demand and land supply has informed the distribution of office space to 2037 and approximately of 3.1 million sqm office supply has been identified across the Plan area. The majority of this land supply is within the urban area and over 80% is in the Core Growth Area - the most accessible location via public transport and other sustainable transport modes. The distribution supports the Spatial Strategy, focusing growth in the Core Growth Area and is set out below in Table 10.1.

District	Office Existing Supply & Allocations Total 2021-2037 (sq m Floorspace)
Bolton	90,579
Bury	39,686
Manchester	2,233,914
Oldham	61,619
Rochdale	95,036
Salford	337,576
Tameside	25,902
Trafford	257,101
Wigan	9,349
Places for Everyone Plan	3,150,763

Table 11.1 PfE Distribution of Space to 2037

Industrial & Warehousing

- 11.8** The PfE 2021 target for industrial and warehousing requirement to 2037 is approximately 3,330,000sqm. There is evidence that past industrial and warehousing completions have been constrained by a lack of suitable sites within the Plan area, resulting in the city-region being unable to compete for some major occupiers.
- 11.9** The PfE 2021 is seeking to significantly increase the supply of sites across the northern parts of Greater Manchester to help increase the competitiveness of the north, including a major opportunity site called Northern Gateway. The existing supply of potential industrial and warehousing sites identified in the districts' strategic employment land availability assessments are insufficient to meet the overall identified need. Consequently, Green Belt release is required and this has been focused in the north of the City-Region to support the Spatial Strategy, boosting competitiveness of the north.
- 11.10** To accommodate growth in industrial and warehousing provision in the Plan area a site selection exercise was followed testing sites against criteria promoting sustainable development. A number of industrial warehousing allocations require alteration to the Green Belt and these are set out in PfE 2021 and relevant evidence is provided to support them.

11.11 The proposed distribution of industrial and warehousing requirement across PfE is shown below:

District	Industry & Warehousing Existing Supply & Allocations Total 2021-2037 (sq m Floorspace)
Bolton	754,208
Bury	500,481
Manchester	92,641
Oldham	251,143
Rochdale	574,916
Salford	517,513
Tameside	271,812
Trafford	506,989
Wigan	490,685
Places for Everyone Plan	3,960,389
<p>1. The floorspace arising at Policy JP Allocation 1.1 'Heywood / Pilsworth (Northern Gateway)', has been split between Bury and Rochdale based on illustrative plans and may be subject to change following comprehensive masterplanning.</p> <p>2. The floorspace arising at Policy JP Allocation 2 'Stakehill', has been split between Oldham and Rochdale based on illustrative plans and may be subject to change following comprehensive masterplanning.</p>	

Table 11.2 PfE Distribution of Industry and Warehousing to 2037

Neighbouring Authorities - Accommodating PfE Growth

- 11.12** As the existing land supply is not adequate to accommodate all of PfE's office, industrial and warehousing requirement to 2037, therefore, there is a requirement to release some Green Belt. The NPPF paragraph 137 states the "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development". One such way, is asking neighbouring authorities whether they can accommodate some of the identified need for development which cannot be met within the existing urban area.
- 11.13** At each stage of the joint plan from the draft GMSF 2016 onwards, neighbouring authorities outside of GM responsible for local plan preparation and employment provision have been asked if they can accommodate any of GM's employment need and now the PfE's employment need. When the Publication GMSF was being prepared neighbouring authorities were contacted in April 2020 and they have been contacted again in Spring 2021 as part of the PfE preparation. The responses from the Revised Draft GMSF up to the current position with the PfE are indicated below and so far the answer has been no neighbouring authority can accommodate our growth. A number of neighbouring authorities have either released or are proposing Green Belt release to accommodate their own growth requirement. The responses setting out the position of the local authority and why they are unable to consider accommodating any PfE employment need is set out in the Log of Collaboration.

Neighbouring Authority- request to accommodate office, industrial & warehousing growth	Revised Draft 2019 (Yes/No)	Spring 2020 (Yes/No)	April 2021 (Yes/No)
Blackburn with Darwen Borough Council	No response	No	No
Calderdale Council	No	No	No
Cheshire East Council	No response	No	No
Chorley Borough Council	No	No	No
High Peak Borough Council	No	No	No
Kirklees Council	No	No	No

Neighbouring Authority- request to accommodate office, industrial & warehousing growth	Revised Draft 2019 (Yes/No)	Spring 2020 (Yes/No)	April 2021 (Yes/No)
Rossendale Borough Council	No	No	No
Stockport Metropolitan Borough Council	n/a	n/a	No response
St. Helen's Council	No response	No	No
Warrington Borough Council	No	No	No
West Lancashire Borough Council	No	No	No

Table 11.3 Responses to GMCA ask to Accommodate Growth

Stockport Metropolitan Borough Council

- 11.14** Following Stockport's departure from the joint plan making process Stockport sent a letter setting out their intention to collaborate with the PfE districts. They also requested that the PfE consider continuing to accommodating some of Stockport's employment need which had previously been redistributed across GM as part of the GMSF.
- 11.15** After consider the request, the PfE districts responded with a letter dated 19th April stating:
- 11.16** "Whilst it is true that the GMSF proposed to redistribute some of Stockport's need across Greater Manchester, the approach to the redistribution of need was designed to benefit the whole of Greater Manchester and to meet its overall economic ambitions as established in the Greater Manchester Strategy and the Local Industrial Strategy. In light of this overall ambition and having considered the potential opportunities for economic growth across the nine districts of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan, we would like to discuss the possibility of accommodating some of your employment growth to 2037."
- 11.17** The letter above was followed by a meeting on 26th May 2021 between PfE representative and Stockport MBC and one of the outcomes recorded on the Duty to Co-operate Proforma stated:

- 11.18** "Ongoing discussions to continue on amount of Stockport's Industrial and Warehousing employment land to be accommodated in PfE. May need interim position for SofCG supporting PfE in Autumn but can change in subsequent iterations, if required."
- 11.19** Due to the tight timescales to move the PfE to Publication stage, a further letter was sent by PfE districts to Stockport MBC on 11th June 2021 reflecting the update given by Stockport on their Local Plan preparation and the Call for Sites process and requesting evidence to progress collaboration on accommodating some of Stockport's employment provision in the PfE, it stated:
- 11.20** "From our discussions on 26 May 2021, it is apparent that it is too early to be able to have conclusive discussions on potential redistribution of development needs, given that the preparation of the Stockport Local Plan is at an early stage, with the call for sites consultation closing on 23 May 2021. I am not aware that you have carried out an assessment of Stockport Council's unmet needs yet. Once this assessment has been undertaken, and any potential shortfall has been identified, I would be grateful if you would share this information with me so that the districts may consider whether it is possible to meet all or some of the unmet need in PfE.
- 11.21** In the light of this, the districts would wish to seek to agree a process for future engagement between Stockport Council and the other nine districts regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone."
- 11.22** To date there has been no further communication from Stockport. They have not set out the unmet employment need which they would like the PfE to consider accommodating. The PfE will consider the position further when it has received the information required and give full consideration to their request.
- 11.23** The current position set out in the Publication PfE is the nine district's employment need to 2037, with no unmet need accommodated outside of PfE plan area and accommodating no unmet need from a neighbouring authority.

PfE Statement of Common Ground 3

Employment Distribution

Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan authorities all agree to the employment need and distribution as set out above and in Table 6.1 "Office Land Supply 2020-2037" supporting policy JP-J3 Office Development and Table 6.2 Industry and Warehousing Land Supply 2020-2037" supporting policy JP-J4 Industry and Warehousing within the Places for Everyone Publication Plan 2021.

The neighbouring authorities of Blackburn with Darwen, Calderdale, Cheshire East, Chorley, High Peak, Kirklees, Rossendale, St. Helen's, Stockport, Warrington and West Lancashire confirm they are unable to meet any of PfE's employment requirement.

The preparation of Places for Jobs meets the duty to co-operate requirements.

12 Places for Homes

12.1 The approach to housing policies in the PfE has been informed by NPPF, NPPG, local strategies, PfE objectives, evidence and consultation comments, including collaborative activity with duty to co-operate bodies. The PfE has followed the standard methodology set out in the PPG (December 2020 update) to calculate housing need and used the 2014-based household projections as the starting point for the assessment of Local Housing Need. The preparation of the PfE plan required existing evidence to be revisited to take account of Stockport's departure from the joint plan process and addendum's prepared and should be read with the existing evidence.

12.2 As strategies and evidence have become available it has been shared as part of the evidence base. Some of the evidence prepared to support the joint plan has been shared with duty to co-operate bodies outside of consultation periods and views sought on approaches to methodologies. Some of the evidence has been updated at each iteration and shared again. Key pieces of evidence for the PfE include:

- Greater Manchester Strategic Housing Market Assessment
- Local Housing Need for PfE (set out in the SHMA)
- PfE Housing Land Supply
- GMSF Strategic Viability Report Stage 1

Greater Manchester Strategic Housing Market Assessment

12.3 The SHMA presents a clear, evidenced picture of the Greater Manchester housing market and how it is changing, to provide an assessment of future needs for both market and affordable housing, and to explore the housing needs of different groups within the population over the plan period. One of the main conclusions is that Greater Manchester can be defined as a single housing market for planning purposes.

Local Housing Need for PfE

12.4 The local housing need has followed the standard methodology which takes projected population and household growth and applies an affordability uplift to provide a local housing need figure, plus an additional 35% uplift which applies to the largest cities and urban areas which includes Manchester City Council.

- 12.5** The Publication Plan sets a housing requirement of 164,880 homes for the period to 2037. This requirement is derived from the nine strategic plan making authorities local housing need.

Housing Land Supply

- 12.6** The PfE Plan has sought to accommodate all its own needs in line with the Growth and Spatial Options Paper. The PfE Housing Land Supply forms a key component of the evidence base. Each of the nine districts has carried out their own assessment of housing land availability and prepared their own Strategic Housing Land Availability Assessment (SHLAA). The PfE HLS brings together information from each of the nine districts to identify the total housing land supply across the plan area.

GMSF Strategic Viability Report Stage 1 and 2

- 12.7** As part of preparation of the October 2020 GMSF a Strategic Viability Assessment of the Spatial Framework (VASF) was prepared by Three Dragons to test whether the policy requirements in the GMSF would threaten the development viability of the plan as a whole. This was published in September 2020 as part of the evidence base accompanying the GMSF. The evidence underpinning the report was collected during 2019 and early 2020. A subsequent addendum was prepared in June 2021.
- 12.8** The underlying message of Stage 1 of the viability testing is that most development types can meet the policy requirements of the draft plan in the medium to high value areas (VA1-3). However, in low value areas of the plan area, there is a need for public sector intervention to achieve viable scheme delivery and to meet the requirements of the draft plan.
- 12.9** Stage 2 assessed viability of the allocations which showed the majority were viable with some sites requiring public support to proceed.

Places for Everyone - Housing Allocations

- 12.10** The existing land supply within the urban area almost meets the local housing need within the Plan. However, meeting the numerical need alone, is not enough. The Plan must be able to demonstrate that its land supply has sufficient flexibility within it to demonstrate that it represents a deliverable, viable and robust land supply and will deliver a balanced and inclusive growth. A buffer has been included in the overall land supply which is considered sufficient to ensure deliverability.
- 12.11** In light of this and the need to ensure the Green Belt boundary can endure beyond the plan period it has been necessary to identify additional new sites across the city-region, over and above those in the existing land supply. Having considered a number of spatial options, it has been concluded that in order to achieve this, it has been necessary to remove some land from the Green Belt and to allocate this land for residential development.

12.12 Sites have been identified through a site selection process with criteria supporting sustainable development. New sites requiring alteration of the Green Belt boundary are set out in PfE 2021 and relevant evidence is provided to support them.

Neighbouring Authorities - Accommodate PfE Housing Growth

12.13 In order to alter the Green Belt boundary and bring forward sites for housing, the NPPF 2019 paragraph 137 states that "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development". One such way, is to have discussions with neighbouring authorities and request whether or not they can accommodate some of the identified need for development.

12.14 Each of the neighbouring authorities outside of the PfE Plan area responsible for local plan preparation and housing provision has been asked on a number of occasions if they are able to accommodate any of the joint plans housing need. As part of the preparation for the Publication GMSF neighbouring authorities were contacted in Spring 2020 and the most recent communication was in Spring 2021. The responses for our neighbouring authorities is summarised below and we await some responses. A number of neighbouring authorities have either released or are proposing Green Belt release to accommodate their own housing requirement and are unable to accommodate our growth. The full responses from the neighbouring authorities are provided in the PfE Log of Collaboration.

Neighbouring Authority- response to request to accommodate housing growth	Revised Draft 2019 (Yes/No)	Spring 2020 (Yes/No)	Spring 2021 (Yes/No)
Blackburn with Darwen Borough Council	No response	No	No
Calderdale Council	No	No	No
Cheshire East Council	No response	No	No
Chorley Borough Council	No	No	No
High Peak Borough Council	No	No	No
Kirklees Council	No	No	No

Neighbouring Authority- response to request to accommodate housing growth	Revised Draft 2019 (Yes/No)	Spring 2020 (Yes/No)	Spring 2021 (Yes/No)
Rossendale Borough Council	No	No	No
St. Helen's Council	No response	No	No
Stockport Metropolitan Borough Council	n/a	n/a	No response
Warrington Borough Council	No	No	No
West Lancashire Borough Council	No	No	No

Table 12.1 Responses to GMCA ask to accommodate growth

Housing Distribution PfE

12.15 Based on the position to date there are currently no unmet needs identified by the PfE districts and we are fully accommodating our growth within our borders which aligns with GM as the housing market area and travel to work area. The distribution of housing targets has been in line with the Spatial Strategy: focusing on the Core Growth Areas; boosting northern competitiveness; and sustaining southern competitiveness. The amount of buffer identified is in response to national policy, allowing for flexibility in provision and in response to identified viability issues, especially in the northern districts.

12.16 The local housing need and distribution across each of the nine districts is set out in the PfE and shown in Table 11.1. This also shows the scale of the buffer in each district and the total target in each district as a percentage of their LHN.

District	2021-2037 Local Housing Need	2021-2037 Buffer	Total target as % of LHN	Total Land Supply 2021-2037
Bolton	12,528 (783pa)	2,083 (17%)	100%	14,672
Bury	9,456 (591pa)	1,388 (19%)	76%	8,616
Manchester	56,432 (3,527pa)	3,072 (5%)	100%	59,600

District	2021-2037 Local Housing Need	2021-2037 Buffer	Total target as % of LHN	Total Land Supply 2021-2037
Oldham	10,832 (677pa)	1,917 (18%)	100%	12,801
Rochdale	8,048 (503pa)	1,576 (16%)	122%	11,434
Salford	21,184 (1,324pa)	9,495 (36%)	125%	36,023
Tameside	10,416 (651pa)	42 (6%)	74%	8,200
Trafford	22,032 (1,377pa)	2,744 (15%)	81%	20,698
Wigan	13,952 (872pa)	3,178 (20%)	111%	18,732
PfE Plan Area	164,880 (10,305pa)	25,895 (16%)	100%	190,776

Table 12.2 Housing Distribution PfE

Duty to Co-operate Comments Since January 2019

- 12.17** High Peak raised concerns about the housing figures not matching the ambitious employment growth and this leading to more pressure on neighbouring authorities to release more land for housing. They stated the re-distribution of housing in GM means Tameside and Stockport are not meeting their own need but it is being redistributed into Manchester. The higher density type of housing in the core may not be attractive to families leading to more pressure on High Peak to accommodate housing to serve growth in Tameside and Stockport (these comments were made prior to Stockport MBC's decision to leave the joint plan making process). Similar comments were made by West Lancashire who are concerned the housing figures do not match the ambitious employment growth and this could lead to more pressure on neighbouring authorities to release more land for housing.
- 12.18** West Lancashire also raised concerns there is not enough flexibility in the local housing supply to meet local housing need requirements. Linked to this they raise concerns the PfE should identify safeguarded land in order to meet the longer term development needs stretching beyond the plan period and to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

Response to Duty to Co-operate Comments

- 12.19** The nine PfE districts are seeking to meet all local housing need within their areas and have not identified any unmet need which neighbouring authorities are being asked to provide. The PfE decided to share housing need between districts to meet the overall spatial strategy focusing on the Core Growth Area, boosting the competitiveness of the north and sustaining southern competitiveness.
- 12.20** The PfE SHMA considers that whilst Greater Manchester has important and valuable relationships with neighbouring districts and further afield, it is reasonable to define Greater Manchester as a housing market area for strategic planning purposes.
- 12.21** The PfE Local Housing Supply identifies sufficient housing land to meet needs to 2037 with a buffer of 16% to take into account flexibility and choice and in response to challenging viability in the Northern districts. This buffer means the Green Belt boundary will endure beyond the period. Notwithstanding this, a policy has been included in the PfE in relation to safeguarded land.
- 12.22** Chorley has raised concerns about gypsy and travelling show people provision and that this is not dealt with in the PfE Plan. Policy JP-H3 Type, Size and Design of New Housing indicates that District's local plans will deal with housing provision to accommodate specific groups.

Stockport Metropolitan Borough Council

- 12.23** Following Stockport's departure from the joint plan making process they sent a letter setting out their intention to collaborate with the PfE districts. They also requested that the previous position in the PfE had seen some of Stockport's housing need redistributed across GM. They asked if the PfE intends to continue on this basis of previously agreed levels of redistribution which were 30% of Stockport's total Local Housing Need provision.
- 12.24** After consideration of this letter, PfE districts responded with a letter dated 19th April stating:
- 12.25** "Your letter also referred to the previous agreement within the GMSF to redistribute nearly 30% of Stockport's Local Housing Need (LHN) within the other nine Greater Manchester authorities. Since the preparation of the GMSF 2020, the position has changed in relation to housing need across the nine districts. In mid-December 2020 the Government confirmed the new LHN methodology which means that Manchester's LHN now includes a 35% uplift creating a higher housing provision for the remaining Greater Manchester nine authorities to accommodate. Using the Standard Methodology for LHN (including the 35% uplift in Manchester), the housing requirement for the remaining nine districts is 164,880 new homes. Despite looking at increasing densities, repurposing our town centres and re-allocating employment land for housing thereby identifying a significant supply within the urban area, we do not consider that we are in a position to fully meet our Local Housing Needs without looking at land outside of the urban area. Having considered the opportunities for residential growth across the remaining nine districts, particularly in light of the increased LHN for Manchester City Council, which must be met within its boundary, the nine districts are no longer in a position to accommodate any of Stockport's housing growth."
- 12.26** A meeting was held on 26th May 2021 between PfE representative and Stockport MBC and one area of discussion was the evidence being commissioned by Stockport seeking to identify any new sites for housing, densities and role of the town centre.
- 12.27** A further letter was sent by PfE representatives to Stockport MBC on 11th June 2021 and this recognised that housing evidence was still being gathered by Stockport and stated:
- 12.28** "From our discussions on 26 May 2021, it is apparent that it is too early to be able to have conclusive discussions on potential redistribution of development needs, given that the preparation of the Stockport Local Plan is at an early stage, with the call for sites consultation closing on 23 May 2021. I am not aware that you have carried out an assessment of Stockport Council's unmet needs yet. Once this assessment has been undertaken, and any potential shortfall has been identified, I would be grateful if you would share this information with me so that the districts may consider whether it is possible to meet all or some of the unmet need in PfE."

- 12.29** In the light of this, the districts would wish to seek to agree a process for future engagement between Stockport Council and the other nine districts regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone."
- 12.30** To date there has been no further communication from Stockport MBC and the position set out in the PfE represents the known position where no unmet housing need in Stockport has been identified and no request to accommodate unmet need has been made by Stockport. The PfE will continue to collaborate with Stockport and consider the position further when it has received relevant information from Stockport.
- 12.31** The position set out in the Publication PfE is the nine district's housing need to 2037, with no unmet need accommodated outside of PfE plan area and accommodating no unmet need from a neighbouring authority.

PfE Statement of Common Ground 4

PfE Housing Distribution

Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan authorities have agreed the local housing need to 2037 and its distribution as set out above and in Table 7.1 "Sources of housing land supply 2021-2037" supporting policy JP-H1 Scale, Distribution and Phasing of New Housing Development in the Publication Places for Everyone 2021. All nine authorities agree to meeting the combined housing need within PfE boundary.

The neighbouring authorities of Blackburn with Darwen, Calderdale, Cheshire East, Chorley, High Peak, Kirklees, Rossendale, St. Helen's, Stockport, Warrington and West Lancashire have confirmed they are unable to meet any of PfE's housing need.

The preparation of Places for Homes meets the duty to co-operate requirements.

Chew Brook Vale (Robert Fletchers)

- 12.32** The Peak District National Park has raised concerns about the Chew Brook Vale allocation over various iterations of the joint plan largely related to the impact of this proposed development on the Peak District National Park. The PDNP are supportive of the redevelopment of the former Fletcher Mill but has concerns about the wider development area within the Revised GMSF 2019, including inclusion of Green Belt within the boundary, enabling development, the HRA requirement for further detailed assessment to determine if the site is functionally linked to the South Pennines SPA and expansion of the holiday lodges by 10-15 units.

- 12.33** Oldham Council and Peak District National Park met to discuss the comments made to the Revised GMSF 2019 in May 2020. They discussed the need for an exemplary landscape setting to reduce impact on the National Park, altering the boundary, HRA and specific policy wording.
- 12.34** The allocation has been amended to ensure development is in accordance with a masterplan and design code. The allocation boundary has reduced and now relates only to previously developed land and the number of homes planned has been reduced to 90 units to reflect this. Reference has been inserted to state development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act 1995. It must have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt. The reference to the proposed increased number of holiday lodges has been removed.

PfE Statement of Common Ground 5

Chew Brook Vale

Chew Brook Vale allocation has been amended to reflect the most up to date evidence supporting the PfE and take into account concerns raised by Peak District National Park. Oldham Council will continue to collaborate with PDNP with regard to proposals for Chew Brook Vale.

The preparation of the Chew Brook Vale allocation meets the Duty to Co-operate requirements.

13 Greener Places

- 13.1** The approach to policies in A Greener Place has been informed by NPPF, NPPG, local strategies, PfE objectives, evidence and consultation comments, including collaborative activity with duty to co-operate bodies. They have also been shaped by the 25 Year Environment Plan and the Urban Pioneer Project. The preparation of the PfE plan required existing evidence to be revisited to take account of Stockport's departure from the joint plan process and addendum's prepared and should be read with the existing evidence. Beyond the NPPF, the approach to a Greener Places chapter in the Places for Everyone Plan has been informed by a variety of evidence and strategies. Key studies include:
- Greater Manchester Five Year Environment Plan
 - Green Infrastructure: Priority Green and Blue Infrastructure Study
 - Trees and Woodland Strategy for Greater Manchester
 - Greater Manchester Landscape Character & Sensitivity Assessment

- Greater Manchester Accessible Natural Greenspace Analysis
- Greater Manchester Biodiversity Net Gain
- Soil Resources including Defra Peatland Pilot
- Greater Manchester Clean Air Plan
- Stage 1 Greater Manchester Green Belt Assessment
- Stage 2 Greater Manchester Green Belt Study

Green Infrastructure: Priority Green and Blue Study

13.2 The Priority Green and Blue Study identified and mapped a strategic priority green infrastructure network for Greater Manchester. The study has built on a range of existing data and previous studies. The study identified:

- a priority green infrastructure network;
- developed an ecological network for GM made up of uplands, river valleys and canals, woodlands and trees, lowland wetlands, major parks and green spaces;
- Strategic opportunity areas and sites for green infrastructure enhancement;
- Targets and standards.

Greater Manchester's Tree and Woodland Strategy

13.3 City of Trees, the ten districts of Greater Manchester, Natural England, the Woodland Trust and the Forestry Commission have produced 'All Our Trees: Greater Manchester's Tree & Woodland Strategy'. The strategy provides the basis for the protection and expansion of Greater Manchester's forest canopy, assisting the planning process, and setting out defined actions that need to be taken, based on clear evidence about the current tree resource. It also describes where new tree planting should be targeted, and how to make sure new and existing trees and woodlands continue to provide key benefits.

Landscape Character and Sensitivity Assessment

13.4 The GMCA commissioned LUC to complete a landscape character and sensitivity assessment across Greater Manchester. The assessment:

- Provides an evidence base for the landscape character/sensitivity of Greater Manchester which takes account of changes in land use, pressures for change including characterisation of the landscape, identification of sensitive and non-sensitive areas.
- Contributes towards the development of the Greater Manchester Spatial Framework by bridging the Natural England National Character Area profiles, North West Regional Character Framework and character assessments undertaken by individual districts.
- Considers cross boundary matters, in particular views from the Peak District National Park and Natural Improvement Areas and identifies anomalies and discontinuities as well as potential enhancements and improvements.

- Provides guidance and advice to help shape the scope of more detailed area specific assessments where required.

Greater Manchester Accessible Natural Greenspace Analysis

13.5 The GMCA commissioned Natural England, supported by Ordnance Survey, to undertake a Greater Manchester Accessible Natural Greenspace Analysis. The study complements the existing greenspace audits and strategies that have been produced by the ten districts of Greater Manchester to support their own district Local Plans by considering and identifying a consistent evidence base for accessible greenspace. This will enable a strategic overview of greenspace provision in Greater Manchester.

Greater Manchester Biodiversity Net Gain

13.6 The GMCA is working closely with Natural England to ensure that the city region is ready to implement biodiversity net gain requirements in new development, recognising that the National Planning Policy Framework already requires biodiversity net gains to be demonstrated in development proposals and that the forthcoming Environment Bill will make biodiversity net gain in development a mandatory requirement. So far a Biodiversity Net Gain Roadmap has been produced which established a task group to oversee the Roadmap on behalf of the Local Nature Partnership. In addition, a Biodiversity Net Gain Guidance was produced in May 2019 which recommends the processes to embed biodiversity net gain into planning for development. The GMCA is working with Natural England on a Greater Manchester Biodiversity Net Gain Implementation Action Plan. The action plan will set out the key activities required to get Greater Manchester ready for biodiversity net gain in development as a legal requirement.

Soil Resources

13.7 During the preparation of the GMSF, the GMCA engaged Natural England for advice on how the joint plan should plan positively for soil resources. The detail of Natural England's advice is given in the Natural Environment Topic Paper, in summary the advice sought to safeguard the Best and Most Versatile agricultural land, avoid development that would disturb or damage other soils of high environmental value, ensure soil resources are conserved and managed in a sustainable way.

13.8 Consequently, Policy JP-G 9: A Net Enhancement of Biodiversity seeks to safeguard, restore and sustainably manage our most valuable soil resources, tackling soil degradation/erosion and recovering soil fertility, particularly to ensure protection of peat-based soils and safeguard 'best and most versatile' agricultural land. The policy also expects development to achieve a net gain in biodiversity. The approach taken in Policy JP- G 9 is consistent with the England Peat Action Plan (May 2021).

- 13.9** Also, a new pathfinding peatland restoration pilot has been launched in Greater Manchester. The programme explains how local stakeholders can work together to improve the condition of English peatlands to help wildlife, people and the planet now and into the future.

Duty to Co-operate Comments Since January 2019

- 13.10** The issue of cross boundary landscapes and green infrastructure and networks has been raised by Natural England, Greater Manchester's Natural Capital Group (GM Local Nature Partnership), West Lancashire, Rossendale, High Peak, Peak District National Park, the Natural Capital Group and Salford Clinical Commissioning Group. The above provides a consistent evidence base, assessing the quality and sensitivity of different landscapes, biodiversity, and considering cross-boundary relationships.
- 13.11** Natural England submitted a comprehensive response to the Revised GMSF 2019. They sought to work with the GMCA to strengthen the plan to deliver stronger protection for the natural environment. They emphasised the opportunities presented by the Draft GMSF to deliver natural capital net gains in the areas of wetland habitat and enable a functioning nature recovery network.
- 13.12** Key comments related to strengthening the approach to natural capital in the plan especially in reference to Green Infrastructure. Providing an improved definition of Green Infrastructure. Suggested amendments to the following policies are made: the Lowland Wetlands and Mosslands; Uplands; Urban Green Space; Trees and Woodland; Green Infrastructure Opportunity Areas and; Standards for a Greener Greater Manchester. The policy A Net Enhancement of Biodiversity and Geodiversity should refer to biodiversity net gain rather than enhancement of biodiversity net gain, which is not in accordance with Defra's definition, this point was also made by the Environment Agency and Greater Manchester Natural Capital Group (Local Nature Partnership).
- 13.13** Cheshire East made the comment there is the opportunity to improve Green Infrastructure links between Greater Manchester and Cheshire East, including ensuring development at the Airport and proposed HS2 positively contribute. Proposals should protect and develop wildlife and recreational links between and across the Local Authority boundaries, and be sympathetic to Green Infrastructure.
- 13.14** Environment Agency seek amendments to the Green Infrastructure policy to better reflect the role it can play in managing current and future flood risk, further amendments have been incorporated. They sought reference to natural flood management in JP-G5 Uplands and this has been inserted.
- 13.15** The Greater Manchester Natural Capital Group would like the Green Infrastructure opportunity mapping to be reconsidered in light of a more comprehensive Nature Recovery Network.

Response to Duty to Co-operate Bodies

- 13.16** In response to Natural England's comments, the GMCA and PfE districts have continued to work with Natural England on the development of the evidence base and policy development, as listed above. Changes to the A Greener Places chapter have taken on board many of Natural England's comments. It has strengthened the references to the approach to natural capital. The definition of Green Infrastructure has been improved in policy JP-G 2 Green Infrastructure Network. The role of different types of green infrastructure to Nature Recovery Network have been added and recognised in the Plan. Amendments have been made to various policies to reflect updated evidence and also respond to NE comments. Policy JP-G 2 Green Infrastructure Network has been improved to pick up references to green infrastructure in new development and also where new provision is made as part of a development the developer should make appropriate provision for its long term management and maintenance. The policy a Net Enhancement of Biodiversity and Geodiversity now includes reference to achieving biodiversity net gain.
- 13.17** NE made comments that some sections of undeveloped mossland are considered inappropriate for future development as they are well-located to make a notable contribution to delivering more balanced and inclusive growth. Such areas will only be developed where they are shown to be of limited ecological value and the development can be delivered without compromising the green infrastructure role of the wider area.

PfE Statement of Common Ground 6

Green Infrastructure

The collaborative approach to the development of the evidence base, understanding cross boundary issues and policy development has informed preparation of policies in the chapter A Greener Places. The evidence base and PfE A Greener Places provide a sound basis for continued collaboration between PfE districts, the GM Natural Capital Group, Natural England and cross boundary neighbouring authorities: Blackburn with Darwen, Calderdale, Cheshire East, Chorley, High Peak, Peak District National Park, Kirklees, Rossendale, St. Helen's, Stockport, Warrington and West Lancashire.

Issues raised by Natural England have been fully considered in the preparation of the Publication PfE plan and active collaboration has been sustained from the early stages of plan preparation to the current plan stage. The amendments to the PfE plan now meet the substantive concerns raised by Natural England.

The preparation and development of the A Greener Places chapter meets the Duty to Co-operate requirements.

Green Belt

- 13.18** The PfE shares its Green Belt with all the neighbouring districts. As the land supply for both housing and employment has shown it is either inadequate to meet need or not sufficiently flexible to deliver a balanced and inclusive growth and achieve the overall spatial strategy, resulting in a need to release land from the Green Belt. To accommodate the PfE housing and employment requirement an assessment of the Greater Manchester Green Belt has been undertaken. The City-Region has sought to share relevant evidence with neighbouring authorities and the methodology to the Stage 1 Greater Manchester Green Belt Assessment 2016 was shared with neighbouring authorities in March 2016. The comments received were discussed with the steering group and incorporated as appropriate.
- 13.19** The Stage 1 Green Belt Study assessed the whole of the Green Belt in Greater Manchester in terms of its contribution to the five purposes of the Green Belt. The stage 2 Green Belt study assesses the potential impact on the Green Belt resulting from release of land within the development allocations and new Green Belt additions proposed by the PfE. It also assessed the contribution made by new additions to the Green Belt and the combined effect of proposed releases and proposed new additions on the strategic functioning of the Green Belt. It also considers the potential to enhance the beneficial use of land which remains in the Green Belt, close to the proposed allocation. Following Stockport's departure from the joint planning process a further addendum was added to the Stage 2 Greater Manchester Green Belt Study to reflect the changes between the GMSF 2020 and PfE 2021. This took into account the removal of the Stockport proposed allocations in the Green Belt and also other changes to other proposed allocations in the PfE.

Duty to Co-operate Comments Since January 2019

- 13.20** High Peak raised concerns about the evidence supporting the proposed Green Belt alterations and believe that the scale of the Green Belt loss and additions proposed means there is a need for the a comprehensive strategic review of the Greater Manchester Green Belt. They reflect on sharing a common area of Green Belt which extends into both Stockport and Tameside (comments made prior to Stockport's departure).
- 13.21** West Lancashire have raised concerns that there is not enough flexibility in housing land supply and safeguarded land should be identified to ensure Green Belt boundaries do not need to be altered at the end of the Plan period.
- 13.22** Peak District National Park believe the policy wording should be clarified with regard to allowing a relaxation of Green Belt policies if a proposal is in accordance with a relevant allocation policy. Natural England have made a number of specific comments on individual allocations which affect the Green Belt but not to the principle of altering the Green Belt.

Response to Duty to Co-operate Comments

- 13.23** The approach to the Green Belt has been updated in response to issues raised to the previous draft and a new policy has been included in relation to safeguarded land, additional evidence prepared in relation to the proposed changes to the Green Belt boundary. It is judged that this substantial part of the evidence base responds to concerns outlined in consultation and helps to underpin the important decisions made to amend Green Belt boundaries. With regard to changes to Policy JP-G 10 The Green Belt itself, the policy is largely unaltered from the 2019 version.

PfE Statement of Common Ground 7

The Green Belt

The local authorities of Blackburn with Darwen, Calderdale, Cheshire East, Chorley, High Peak, Peak District National Park, Kirklees, Rossendale, St. Helen's, Warrington and West Lancashire have been consulted on Greater Manchester's Green Belt methodology and considered it an appropriate basis to undertake the Stage 1 Green Belt Study and Stage 2 Green Belt Assessment.

The neighbouring authorities (listed above) and Stockport MBC, Peak District National Park consider Stage 1 Green Belt Study and Stage 2 Green Belt Assessment with PfE Addendum provides an adequate evidence base to alter the Green Belt boundary as set out in Policy JP-G10 The Green Belt, within the Publication Places for Everyone 2021 and enable the districts to accommodate its growth needs to 2037.

Policy JP-G10 The Green Belt and relevant allocation meet the Duty to Co-operate requirements in the preparation of the policy.

Habitat Regulation Assessment

- 13.24** Since the 2019 Revised GMSF Draft the GMCA have engaged Natural England in the preparation of the Habitats Regulations Assessment (HRA). The HRA must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the internationally important interest features of a European site. To date, the GMCA has held five meetings with Natural England to progress the HRA: one informal meeting in 2019, two formal meetings through Natural England's Discretionary Advisory Service in 2020, a meeting in Spring 2021 and a further meeting in July 2021.

- 13.25** The GMCA has shared a draft version of the HRA (updated since 2019) with Natural England for review and comment. The GMCA responded to Natural England's comments by commissioning an air quality assessment to model the implications of changes in air quality on European Protected sites that could potentially affected NOx, nitrogen deposition and ammonia critical loads arising from changes in vehicle movements in Greater Manchester or within close proximity of the Greater Manchester boundary. The first phase of the study: the screening assessment, has been completed and shared with Natural England for comment. The GMCA are committed to working with Natural England to complete the second phase of the assessment: the appropriate assessment, which will assess the air quality impacts on European Protected sites in more detail and assess appropriate mitigation measures.
- 13.26** The GMCA have also responded to Natural England's comments on functionally linked land, recreation disturbances, water pollution and in-combination effects in the HRA.

PfE Statement of Common Ground 8

Habitat Regulation Assessment

The HRA is being updated to ensure it is in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). The GMCA and TfGM will continue to collaborate with Natural England to assess air quality impacts on European protected species, including any mitigation measures that might be required to reduce air quality impacts.

Great Manchester Wetlands Nature Improvement Area

- 13.27** Lowland wetlands and mosslands cover substantial areas within Wigan, west Salford and south-west Trafford, where they form part of the Great Manchester Wetlands Nature Improvement Area which extends into Warrington and measures around 40,000 hectares in total.

PfE Statement of Common Ground 9

Great Manchester Wetlands Nature Improvement Area

The Great Manchester Wetlands Nature Improvement Area covers substantial areas within Wigan, west Salford and south-west Trafford and extends into Warrington. Given the cross boundary nature of the designation there is a requirement for continued collaborative working between Greater Manchester Combined Authority, Salford City Council, Trafford Borough Council and Wigan Borough Council in order to preserve and enhance this ecological network.

14 Places for People

Historic Environment Background Paper

- 14.1** An historic Environment Background Paper has been prepared to bring together a summary of Greater Manchester's historic environment. It provides a historic context for the Plan, starting with Greater Manchester's role in the industrial revolution and moving through the significant periods of its historic past. The Paper has been influenced by a range of studies related to the historic environment as well as input of officers from GMCA, Historic England, the Greater Manchester Archaeology Advisory Service (GMAAS) and the Greater Manchester Conservation Officer's Group (GMCOG), including workshops held in July 2019 and July 2020.
- 14.2** The evidence base presented within the Background Paper demonstrates the rich diversity of Greater Manchester's historic environment. By examining heritage assets, exploring existing legislation and policy and identifying issues and trends this paper has revealed opportunities for the PfE to better preserve and enhance the historic environment. This can be achieved by:
- Ensure the framework sets out a positive strategy for conservation, enhancement and enjoyment of the historic environment;
 - Recognise the value of the historic environment in achieving a sustainable and resilient city-region;
 - Appreciate the distinctive character of Greater Manchester and how it can be a valuable source of prosperity, wellbeing and community cohesion;
 - Complement the conservation and enhancement of heritage with the promotion of high quality design;
 - Highlight heritage at risk;
 - Ensure an up to date evidence base for the purposes of monitoring and review;
 - Developing policies and supporting opportunities to facilitate a reduction in the number of heritage assets at risk of decay and vacancy across GM; and
 - Providing a robust implementation strategy for the framework that gives equal weight to delivery of all aspects of the plan, including conservation of the historic environment.
- 14.3** The Paper gives an historic context and describes key drivers of settlement development. It provides a summary of important heritage assets, which contribute to the distinctive character and identity of Greater Manchester. It then quantifies and describes the types of heritage assets (including designated and non designated) to be found. It also covers the Greater Manchester Urban Historic Landscape Characterisation (HLC) project which has identified a number of historic landscape character types. It sets out the evidence base available at the national level and in the PfE districts. It recognises the role of the historic environment to various sectors of the economy, design sustainability and climate change.

- 14.4** The Paper sets out a series of recommendations to encourage the long-term consideration of heritage assets in the PfE and other areas of work, such as the Heritage at Risk Register and the Historic Environment Record.

Archaeological and Built Heritage Assessment and Screening Exercise

- 14.5** A screening exercise has been undertaken to identify the more sensitive sites where there is known or potential archaeological/ built heritage significance that might be impacted on by development proposals. This sought to provide an understanding of the Historic Environment to comply with the National Planning Policy Framework by:

- Reviewing and enhancing existing Historic Environment Records that fall within the land allocations and using a 250 metre buffer zone
- Examining HER and any other relevant databases (such as the National Heritage List) to identify and map non-designated and designated heritage assets.
- Undertaking a historic map regression exercise to identify previously unrecognised heritage assets with an archaeological interest and confirm location and extent of known assets.
- Reviewing published and secondary sources, such as 'grey literature', local publications, thematic surveys (historic landscape characterisation, moated sites, wetlands, mills etc), and including the North West Regional Research Framework for the Historic Environment.
- Analyse readily available aerial photographs and lidar data where relevant.
- Undertake site visits and walkovers to ground desk based research (using public access only).
- Screen out those sites with no or very low archaeological interest.

Site Level Heritage Assessments

- 14.6** Following the screening exercise above a site level heritage assessments have been carried out for more sensitive sites. This has been used to inform the approach to individual allocations.

Duty to Co-operate Comments Since January 2019

- 14.7** Historic England raised concerns that the Revised Draft GMSF 2019 did not show an appreciation of the area's heritage and this should run continuously throughout the GMSF. The historic environment should be referenced as it provides opportunities to contribute to the area's growth and plays a part in improving the quality of life of residents. They made comments throughout the plan that the GMSF fails to recognise the the conservation or enhancement of the historic environment adequately or as a strategic priority. A reason this may be lacking is due to gaps in the evidence base underpinning the plan.

- 14.8** In 2020 a meeting took place between Historic England and the GMCA to discuss the Statement of Common Ground, GMSF, High Street HAZ, Oldham Mills Strategy and GM Textile Mills Strategy. It was agreed to set up an additional Statement of Common meeting and for the GMCA to share the Historic Environment topic paper, revised policy wording for Crimble Mill, Unity Mill and Land South of Hyde. Historic England agreed to share the draft Oldham Mills Strategy when available.
- 14.9** Subsequent to the meeting above further regular meetings have taken place to discuss the content of the draft PfE. In March 2021 a formal meeting to clarify the position following the regular catch-up's took place and discussed the details of the approach to the historic environment in the PfE. This included the changes to the draft plan to address Historic England's concern around soundness/risk to the historic environment. The main areas discussed were Vision and lack of emphasis of the built/historic environment in the plan. It was explained, there are difficulties around changing the vision as it has been agreed by districts and the Mayor to use the Greater Manchester Strategy vision.
- 14.10** Also discussed were site allocation policies – Historic England requested to see the HIA/HEA work specifically referenced consistently through the site allocation policies where this was relevant. It was agreed that this would be considered, either within policy or as a footnote, but also important to make clear that further work would be required, the HIA is a starting point. It is considered the PfE has made relevant amendments to address this.
- 14.11** With regard to the heritage policy - Historic England would like to see the reasoned Justification strengthened – contextual information is good around the 'why' but weak on the 'how' particularly around 'significance. An outcome of the meeting was Historic England agreed to send a table of proposed changes, ranked in order of importance in terms of soundness/risk to historic environment.
- 14.12** The approach to the historic environment has been updated in response to issues and collaborative activity set out above. The policy has been revised in relation to additional evidence prepared in the Historic Environment Background Paper. It is judged that this substantial part of the evidence base responds to concerns outlined by Historic England and helps to underpin the policies and allocations throughout the plan. With regard to changes to Policy JP-P 2 Heritage, the policy has been amended and an additional paragraph inserted to state proposals should be informed by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process.

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Heritage

The Historic Environment Background Paper, the Archaeological and Built Heritage Assessment and Screening and, where relevant, site level heritage assessments, provide the appropriate level of evidence for the Places for Everyone Publication Plan, and has been used to amend policy JP-P 2 Heritage and relevant allocation policies. The PfE districts will continue to work collaboratively with Historic England during the preparation of their local plans.

Historic England believe the preparation of Policy JP-P2 Heritage meets the duty to co-operate requirements and PfE have collaborated effectively with Historic England.

15 Connected Places

- 15.1** Good transport connections, reducing the need to travel, encouraging sustainable forms of travel and establishing sustainable transport patterns in new development have been a priority in the PfE and informed the site selection process for allocations. Substantial growth planned to 2037 is expected within the existing urban area and it is important to understand the how the existing transport network functions, the impact of the proposed growth within the urban area and the impact of proposed growth from the allocations.
- 15.2** The approach to transport policy and implementation in Greater Manchester is informed by a series of strategies including :
- The Greater Manchester Transport Strategy 2040;
 - Five Year Transport Delivery Plan and Local Authority Implementation Plans;
 - Right Mix Technical Note seeking to achieve the right mix vision for 50% of trips to be made by sustainable modes by 2040;
 - Clear Air Zone documentation;
 - City Centre Transport Strategy;
 - Streets for All;
 - Greater Manchester Walking and Cycling Investment Plan;
 - Bus Reform;
 - Our Prospectus for Rail;
 - PfE: Existing Land Supply and Transport Technical Note;
 - PfE Transport Locality Assessments (TLAs) for the Allocations;
 - PfE Plan Allocations Strategic Modelling Technical Note (SMTN).

- 15.3** Key PfE documents providing evidence of the current situation on our transport network and the impact of proposed growth in housing and employment to 2037 include:
- The PfE Existing Land Supply Note examining the spatial distribution of the Existing Land Supply – identifying clusters of growth and the transport interventions highlighted in the 5-Year Delivery Plan that will support growth in those areas.
 - PfE Transport Locality Assessments (TLAs) for the Allocations. These assessments examine the likely local impact of the development of the Allocation on the transport network and identifies where mitigation may be needed. [PfE 2021 review addendums have been produced for each Local Authority to verify the impact of various minor changes and updated evidence that may influence the conclusions of each Locality Assessment. These addendums should be read alongside the original Locality Assessment].
 - PfE Allocations Strategic Modelling Technical Note (SMTN). This provides analysis of the potential strategic impact of growth on our transport network in a “policy-off” scenario. [An updated version of this technical note has been produced to reflect various minor changes and updated model output data associated with the PfE Plan]
- 15.4** It is important to recognise the role of the spatial options and site selection process in achieving transport objectives for the plan. The decision-making process that lead to the initial identification of allocations sought to maximise the scope for sustainable travel choices by:
- minimising the number of allocations in greenbelt required to meet housing demand;
 - selecting sites that were located close to town centres and public transport hubs
 - selecting sites that had the potential to generate sufficient developer investment and travel demand to support delivery of new viable sustainable travel options.

PfE: The Existing Land Supply and Transport Technical Note

- 15.5** The Existing Land Supply and Transport Technical Note concluded the majority of new housing or office development will come forward in areas that are already well-served by public transport, which means that these sites will be relatively easily accommodated into the existing transport network.
- 15.6** The report finds that the more dispersed nature of industry and warehousing, including logistics and distribution locations, that seek large economically competitive locations close to the motorway network, is to be expected. The degree of public transport accessibility of these sites varies, and in some locations a more innovative approach to public transport provision may be needed.
- 15.7** Transport interventions proposed through the 2040 Transport Strategy Five Year Transport Delivery Plan are broadly consistent with the pattern of potential future development – and there is a clear vision for improving transport within each key growth cluster.

PfE Plan: Allocation Transport Locality Assessments

- 15.8** A series of Allocation Transport Locality Assessments have been prepared for the proposed PfE Plan Allocations to ensure that each allocation has been subject to a thorough, robust and consistent evaluation of likely transport impacts. The assessments verified that the allocations can be brought forward and operate effectively within the context of the wider transport network.
- 15.9** All of the allocations in the PfE Plan have been found to be suitable from a transport perspective subject to necessary mitigations, and satisfy the requirements of National Planning Policy Framework in that they are not expected to have a severe impact on the network.

PfE Plan: Allocations Strategic Modelling Technical Note

- 15.10** The report identifies that the addition of the PfE Plan allocations to the existing land supply will present transport challenges that need to be planned for. The overall forecasts for congestion, crowding and emissions that are evident at the strategic level show that there is a deterioration after the identified interventions are included. However, the results in the Strategic Modelling Technical Note do not include the representation of any transport interventions over and above already committed and funded interventions, nor the introduction of the policy proposals and mode shift proposals set out in TfGM's 2040 Transport Strategy.
- 15.11** The precautionary approach taken means that the levels of congestion and delay reported in the model are considered to be worst case. The model outputs demonstrate that even in our "policy-off" forecast the network continues to function – albeit with some increases in delay – and, as a result, the PfE Plan is not considered to have a severe strategic impact on the transport network. There is also a high degree of confidence that the implementation of the 2040 Transport Strategy will greatly improve the overall effectiveness of the transport network through planned investment in integrated transport solutions.

Stockport Metropolitan Borough Council

- 15.12** Following the departure of Stockport MBC from the joint plan a further model run was commissioned, excluding Stockport's allocations and any associated interventions but retaining the existing land supply data. The parts of the SRN in Stockport are retained for example the M60 to ensure Highway's England understand impact of growth on this part of the network.
- 15.13** Additionally approaches have been made to Stockport to continue collaborative work in relation to site specific transport evidence.

Strategic Road Network and Highways England Duty to Co-operate Comments

- 15.14** Highways England is a duty to do-operate body and is responsible for operating, maintaining and improving the SRN in England.
- 15.15** Highways England have been engaged with the preparation of the Places for Everyone Plan from early stages and in response to the 2016 GMSF raised concerns that the emerging Plan did not have a transport evidence base to support the significant growth aspirations.
- 15.16** Since that point the transport evidence has been gathered and Highways England have taken part in workshops run to gather issues for the Part 1 study and responded with comments to the Study Area Workshop Issues Paper. They responded to the Transport Evidence Base - Phase 1, Transport Study Part 2: Addressing the Issues and Interim Strategic Modelling Report.
- 15.17** At the 2019 Revised Draft GMSF stage Highways England made a number of detailed comments relating to policies and allocations which may impact on the SRN. One of the key comments was insufficient transport evidence had been provided at this stage and this meant Highways England were unable to assess of the impact of the Plan on the SRN (and adjacent local highway links) at an individual site allocations level, or on a cumulative basis. The lack of detailed evidence meant the form, scale and location of the investment needed at the SRN in Greater Manchester as a direct consequence of the growth outlined in the Plan could not be identified.
- 15.18** Since these comments have been made, significant and substantial transport evidence has been prepared to answer the question of the impact of proposed growth set out in the PfE on the SRN. This evidence is detailed above and much of this has been shared with Highways England throughout its preparation including the locality assessments examining the potential impact of an allocation on the SRN. Further impact assessments on the SRN are underway in conjunction with Highways England. This is investigating the cumulative PfE impacts on the SRN mainline links and is expected to deliver key findings in Summer 2021.
- 15.19** Highways England have confirmed in a letter dated 17th June 2021 and shown in Appendix 3, that the PfE sets out plans for new homes and employment floorspace over the plan period and this is an important opportunity for the nine Local Authorities to create the conditions for inclusive growth, to meet housing need and protect and enhance the natural environment with the support of the appropriate transport infrastructure. They support the Greater Manchester Transport Strategy 2040 and commit to playing their part in the delivery of the Five Year Delivery Plans. They recognise the progress being made to deliver the supporting transport infrastructure to deliver the development plans in the previous iteration of PfE.

- 15.20** They confirm their commitment to ongoing collaboration with the GMCA, the nine Greater Manchester districts, Transport for Greater Manchester and partners to deliver the PfE. They will continue to do this through the existing Memorandum of Understanding that has been in place for the last five years with the TfGM.
- 15.21** They state "We believe that PfE, along with GM's proposals in the Clean Air Plan and for tackling climate change, together set a framework for sustainable growth across the region. As such, Highways England will continue to work alongside our strategic partners to better understand the implications of this growth and will continue to investigate how we can make best use of the SRN to support the economy, connect people and places, and improve our environment."
- 15.22** Highways England confirm they are working with TfGM and the GMCA to examine the potential impacts of the plan on the SRN.

Rail Network

- 15.23** The Delivery Plan 2020-2025 provides an update on rail infrastructure delivery commitments including the Castlefield Corridor, Transpennine Route Upgrade to Leeds and "Access for All" station improvements. It identifies the priorities for the next five years including reform of the rail network and rail prospectus priorities including stations. As part of this a Rail Freight Study will feed into the Delivery Plan. Longer term plans for rail include rail capacity improvements on key commuting corridors across GM, platform lengthening and increased electrification, including from Bolton to Wigan, HS2, additional platforms at Manchester Piccadilly and Northern Powerhouse Rail.

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Connected Places

The completion of the Transport Study Strategic Modelling Technical Note examining Existing Land Supply and Allocations and the Locality Assessments for allocations indicates that the Nine PfE districts and Transport for Greater Manchester are committed to fully understanding the impact of growth from the PfE Plan on the SRN and rail network and are committed to continued working with Highways England and Network Rail to implement these proposals. The existing Memorandum of Understanding between Highways England and the Nine PfE districts will form the mechanism for continued collaboration.

Mitigation measures have been identified in the allocations policies in the PfE plan and will form part of the Transport Strategy 2040: Delivery Plans. Implementation of the 2040 Transport Strategy and Delivery Plans will greatly improve the overall effectiveness of the rail network through planned and proposed investment in integrated transport solutions.

The PfE Connected Places and relevant allocations meets the Duty to Co-operate requirements to date and provides a basis for continued collaboration with Highways England and Network Rail.

Neighbouring Authorities

15.24 Transport is a key duty to co-operate cross boundary issue. A number of neighbouring authorities have raised transport concerns, relating to:

- Impact of growth in the PfE on commuting patterns
- Impact of allocations on key transport routes
- Impact of growth on rail and bus provision and improved connections between neighbouring areas and PfE area

15.25 In September 2020, a series of duty to co-operate meetings took place between the Greater Manchester authorities, the GMCA and neighbouring authorities with the focus being the PfE transport evidence. Subsequent to these meetings and following the decision by the nine PfE districts to proceed with a joint plan, a further invite was sent to all offering to meet to update them on the PfE, its evidence and its relationship to the GMSF 2020.

15.26 Attendees at the meeting included:

- Blackburn with Darwen Borough Council
- Calderdale Council
- Cheshire East Council
- Chorley Borough Council
- Derbyshire County Council
- High Peak Borough Council
- Kirklees Council
- Lancashire County Council
- Liverpool City Region
- Peak District National Park
- Rossendale Borough Council
- St. Helen's Council
- Warrington Council
- West Lancashire Borough Council and
- West Yorkshire Combined Authority.

15.27 It provided an opportunity to explain the approach to the transport evidence and how the various elements provided a comprehensive approach to understanding impact and managing growth on the transport network. At this point Stockport MBC was one of the strategic plan making authorities and attended the relevant meetings.

- 15.28** The allocations in the key growth corridors have required transport improvements to complement growth and these are set out below.

North East Growth Corridor

- 15.29** This is focused on the M62 corridor from junction 18 (the confluence with the M60 and M66) to junction 21 (Milnrow), extending across parts of Bury, Rochdale and Oldham. Works to improve the capacity of Simister Island (the junction of the M62, M60 and M66 motorways) are already planned, but additional investment in the motorway network will be required to support the scale of development proposed within the North-East Growth corridor, including improvements to Junctions 3 of the M66. The area may also be the subject of proposals to improve the performance of the whole length of the M62/M60 through Greater Manchester.
- 15.30** Major public transport improvements will be required to ensure that surrounding communities can take advantage of the new jobs, and new residents can access key locations such as the City Centre, nearby main town centres and key employment locations. Improvements to the Calder Valley Line have received commitments to be delivered and the North-East Growth Corridor will also benefit from additional local bus services as well as proposed rapid bus transit to serve the new developments. Work is also on-going into the future development of Bus Rapid Transit connections from the North-East Growth Corridor and surrounding towns to the City Centre.
- 15.31** Consideration is being given to delivering infrastructure that will benefit the wider area, including options for tram-train operation along the route of the East Lancashire Rail line, alongside the Heritage Railway and options for a Metrolink or Bus Rapid Transit extension to Middleton.

Duty to Co-operate Comments

- 15.32** Rossendale and Lancashire County Council have previously raised concerns about increased congestion on the A56/M66 due to identifying Pilsworth for further economic development and the wider impact of the Northern Gateway sites.
- 15.33** Rossendale are seeking a rail link between Rawtenstall and Manchester via Ramsbottom – Bury an Haywood, called Valley City Link. They are exploring a tram-train connection with GM Metrolink at Bury/Buckley Wells or National Rail at Castleton South Junction.
- 15.34** At the Duty to Co-operate meeting in September 2020 Rossendale raised concerns about whether the linkages between the Northern Gateway site and Rossendale have been recognised in terms of commuter flows, including along the M66. It was acknowledged there is a strong connection with the Northern Gateways site for employment opportunities: new residents in the area will commute to work in Rossendale and residents in Rossendale will want to go to the Northern Gateway area to work. It is important to improve the rail commuter route from Rossendale into Greater Manchester. TfGM recognise this and will work more closely with Rossendale around the transport connections.

Wigan-Bolton Growth Corridor

- 15.35** The M6 logistics hub in Wigan (extending into Warrington, St Helens and West Lancashire) provides a major cluster of warehousing and distribution activity with easy access to the Port of Liverpool via the M58. This growth corridor is focused around improved transport links. These include new roads and a Wigan to Bolton Quality Bus corridor and, the more intense use of the Wigan – Atherton – Manchester and the Wigan – Bolton – Manchester rail lines.
- 15.36** New road infrastructure will improve east-west connectivity between junction 26 of the M6 (which is also the junction for the M58 motorway that provides a direct connection to the Port of Liverpool) and junction 5 of the M61. This transport infrastructure will significantly improve highway connections in the north-west of Greater Manchester, and better integrate the strong logistics functions along the M6 and M61 into the wider city region, as well as helping to address local congestion issues.
- 15.37** The increased use of the existing rail lines could include conversion to tram-train use on the Atherton line and electrification on the Bolton line. This would increase capacity and, along the Atherton line, has the potential to increase the number of stations.

Duty to Co-operate Comments

- 15.38** Lancashire County Council has raised the issue of the upgrade and electrification of the railway linking Manchester, Bolton and Preston. They wish to work with TfGM regarding the growth in demand on this line to ensure there is capacity on the railway and trains.
- 15.39** Blackburn with Darwen have raised concerns about the need for improved rail connections into Greater Manchester and especially Manchester Airport. They raised the possibility for a joint approach between TfGM and Blackburn with Darwen over the A666 upgrade.
- 15.40** At the September 2020 Duty to Co-operate meeting Lancashire County Council stated they are exploring the possibility of connecting Skelmersdale into the rail network. This would involve diverting the existing Wigan-Kirby service into, and terminating at, Skelmersdale and extending the Liverpool-Kirby Merseyrail service to Skelmersdale, with new track alignments in to Skelmersdale. It would provide a town centre station and a 'y' shaped arrangement connection to Liverpool and Wigan.
- 15.41** Lancashire County Council have also agreed to contribute towards the North-West quadrant rail study. The study area has been extended, going out to Blackpool and reaches Lancaster & Morecambe. There is concern that PfE growth near the Chorley corridor could have a significant increase on railway demand, with new trains being over-capacity.

Sustaining Southern Competitiveness

- 15.42** Significant levels of transport investment are planned for the southern areas of Greater Manchester. The completion of HS2, new HS2 Stations and Northern Powerhouse Rail, extension of Metrolink will ensure the City Centre and Manchester Airport will be amongst the best-connected locations in the country.
- 15.43** The southern areas benefit from their proximity to prosperous locations just outside Greater Manchester, such as Cheshire East and Warrington, and taking opportunities to increase further the economic and functional connections between these areas supports their mutual success. Given the proximity of development outside the GM boundary to the south, the need to work with our partners to coordinate major development close to the boundaries of Places for Everyone.

Duty to Co-operate Comments

- 15.44** Previously Cheshire East raised comments about the growth planned in the Southern Competitiveness area on the A34. Cheshire East request the SEMMMs study should be refreshed and Stockport MBC agreed with this and led on the update with involvement from Cheshire East, it has now completed. The majority of the interventions relate to the Stockport Council area within Greater Manchester and they are no longer part of the PfE plan. Therefore the key cross boundary transport issues remaining of note to Cheshire East relate to the area around Manchester Airport.
- 15.45** Derbyshire County Council and High Peak Borough Council have also raised concerns about the growth ambitions around employment in PfE driving demand for housing in High Peak and increasing commuting on the A57 and A628. High Peak were also engaged in the SEMMMs refresh led by Stockport MBC.

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Cross Boundary Transport

Neighbouring authorities: Blackburn with Darwen Borough Council, Calderdale Council, Cheshire East Council, Chorley Council, Derbyshire County Council, High Peak Borough Council, Kirklees Council, Lancashire County Council, Liverpool City Region, Peak District National Park, Rossendale Borough Council, St. Helen's Council, Stockport Metropolitan Borough Council, Warrington Borough Council, West Lancashire Council and West Yorkshire Combined Authority agree that the evidence listed above and in particular the:

- PfE Existing Land Supply and Transport Technical Note
- PfE Plan: Allocation Transport Locality Assessments
- PfE Plan: Allocations Strategic Modelling Technical Note

provides the evidence showing that the Places for Everyone Plan builds in capacity for growth across the transport network through transport interventions planned in the Transport Strategy 2040 and the accompanying Delivery Plans and the SRN work programme. The modelling was based on the worst case scenario and indicate the impact on the transport network is not considered severe. Further interventions through the implementation of the strategies outlined above, including the Right Mix Technical Note, should increase sustainable travel modes and deliver growth supporting sustainable patterns of growth. The evidence above informs the policies throughout the Plan, especially:

- The strategic growth areas - North East Growth Corridor, Wigan-Bolton Growth Corridor, Sustaining Southern Competitiveness-;
- Allocation's and their associated transport interventions; and,
- The Connected Places chapter.

It also enables neighbouring authorities (listed above), to fully consider the impact of growth proposed in the Places for Everyone Plan 2021 and provide the basis for continued working.

The studies, strategies and delivery plans also provides information on the planned investment in transport across the PfE Plan and mitigation measures proposed for each allocation. It informs neighbouring authorities and Highways England of all the proposed transport schemes from walking, cycling, rail, bus, tram/train, HS2, highways improvements in the short, medium and long-term. This provides a basis for continued collaborative working between, the nine PfE districts, neighbouring authorities, TfGM and Highways England, on transport improvements within PfE and across boundaries.

The preparation of Connected Places and allocations in PfE meets the requirements of duty to co-operate with neighbouring authorities.

Manchester Airport

- 15.46** The provision of a new HS2 station with journey times to London of just over an hour, and the planned Northern Powerhouse rail network will significantly improve the airport's connectivity and reduce journey times. Journeys to the Airport will also be enhanced by the completion of the Metrolink Western Leg and proposed Rapid Bus Transit service(s) along new spine roads linking development in Timperley Wedge and Medipark into the existing urban areas of Altrincham and Wythenshawe.

Duty to Co-operate Comments

- 15.47** Cheshire East have raised concerns about Airport Growth and the proposed HS2 station at the Airport and impact on congestion. They wish to see improved access to Manchester Airport particularly from the south. The PfE authorities will seek to work with Transport for Greater Manchester, Cheshire East and Stockport Council to deliver cross-boundary transport network improvements including those within the refreshed South East Manchester Multi Modal Strategy which fall within the PfE boundary regarding rail, Bus Rapid Transport, and local buses.

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Manchester Airport

Ongoing co-operation between Manchester City Council, Trafford Council, Stockport Council, Manchester Airport Group, Transport for Greater Manchester, and where relevant Highways England and Cheshire East, will continue examining the impacts and mitigation for HS2, Places for Everyone, Manchester Airport Growth and multimodal solutions, including on the M56 and SRN.

16 Delivering the Plan

Infrastructure Implementation

- 16.1** To ensure effective infrastructure implementation, the strategic plan making authorities - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan - infrastructure providers, national government, regulators and others involved in infrastructure planning and funding will work together, to ensure the effective development and implementation of the infrastructure needed to support the delivery of the vision and objectives set out in the PfE.

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Infrastructure Implementation

The Places for Everyone Publication Plan policy JP- D 1 promotes collaboration and synchronisation of investment plans between the nine PfE districts and the main infrastructure providers: Clinical Commissioning Groups, the NHS, Highways England, Network Rail, Transport for Greater Manchester, United Utilities, the Environment Agency, National Grid, Cadent, United Utilities and digital/telecommunication providers.

Appendix 1: Greater Manchester Combined Authority Boards and Committees

- 1 This section of the document expands upon the GMCA governance.

GMCA/AGMA Executive Board

- 2 The Greater Manchester Combined Authority is the key decision making Committee. As required, a joint GMCA/ AGMA committee is concurrently run, allowing decisions which have their delivery under different bodies and functions to be made in one place. This board deals with the GMSF. Membership is made up of the Mayor and Leaders of each of the ten Greater Manchester Districts. Members from other sub-committees attend, including Transport for Greater Manchester Committee. All decisions not delegated to other Committees are made at the GMCA and AGMA Executive Board.

Joint Committee of the Nine

- 3 Following the departure of Stockport MBC from the joint plan making process, a meeting was held between the remaining districts on 11th December 2020 and at this meeting they agreed in principle to producing a joint DPD. Subsequent to this meeting, each district formally approved the establishment of a Joint Committee for the preparation of a joint Development Plan Document of the nine districts. This has replaced the GMCA/AGMA Board as the key decision making committee for the PfE. Membership is made up of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan

Transport for Greater Manchester Committee

- 4 The Greater Manchester Transport Committee (GMTC) is a joint committee made-up of the principal transport decision-making bodies – the ten GM Councils, the Greater Manchester Combined Authority (GMCA) and the Mayor of Greater Manchester.

- 5 Transport for Greater Manchester Committee (TFGMC) minutes go to the GMCA to be considered and, where necessary, approve the recommendations. It will oversee the performance of the transport system and hold rail, tram, and bus operators, TfGM, and highways authorities to account. This effectively allows the Committee to act in an advisory capacity to the Mayor and the GMCA, through the Mayor's Transport Board.

Transport for the North

- 6 Transport for the North (TfN) is the first sub-regional transport body in the UK. GMCA appoints one member to TfN. As a statutory body, TfN's powers include the ability to produce a statutory transport strategy, fund organisations to deliver transport projects, consultation on all rail franchises in the North and smart ticketing on public transport.

Scrutiny

- 7 Scrutiny of all the above Boards, Committees etc. is offered by scrutiny committees. The GMSF is, in the main, picked up by one scrutiny committee:
- Housing, Planning and Environment Overview and Scrutiny Committee

Local Enterprise Partnership

- 8 The GMCA works in partnership with the GM Local Enterprise Partnership (LEP) to deliver joint strategic priorities in the Greater Manchester Strategy. The remit of the LEP is to empower business leaders to set strategies and economic priorities to drive growth and job creation. GMCA's Wider Leadership Team (WLT) are advisors to the LEP.
- 9 Decisions of the GM LEP are reported via a copy of the draft minutes, to the next GMCA meeting. These papers are publicly available. Decisions taken using delegated authority are reported back to the full GM LEP board the following month.

Greater Manchester Planning & Housing Commission

- 10 The Planning & Housing Commission brings together public and private sector partners to help create a strategic framework that deals with housing, growth, infrastructure and town centres. It is an advisory body to inform policy and decisions by the GMCA/AGMA and other GM strategic bodies. It provides advice on strategic planning and housing issues. It engages with Government and a range of delivery partners to develop and oversee programs at the GM scale.
- 11 Membership includes the GM Portfolio holder for Planning, Housing and Homelessness, a representative of the GM Housing CEO's Group and a representative from infrastructure providers - United Utilities. The Commission identifies and appoints its own advisors and current advisors include Homes England and The Environment Agency. The Commission reports to the GMCA/AGMA Executive Board through its Chair and the lead Chief Executive for Planning and Housing.

Greater Manchester Green City Partnership

- 12 The Partnership is responsible, on behalf of the GMCA, for overseeing the monitoring and delivery arrangements for the Greater Manchester 5 Year Environment Plan, as part of Priority 7 'Green City Region' of the Greater Manchester Strategy. The Partnership will oversee delivery via a number of Challenge Groups, identifying individual tasks (Task and Finish Groups), synergies and gaps, then provision of appropriate advice to the GMCA on mitigation measures, including the development and delivery of future policies and strategies. Membership includes representation for the Natural Capital Group (Local Nature Partnership).

Strategic Infrastructure Board

- 13 The GMSIB brings together at a strategic level the main organisations responsible for managing and/or delivering Greater Manchester's critical physical infrastructure. The role of the Strategic Infrastructure Board is to:
- work strategically and holistically;
 - to take ownership of the Greater Manchester Infrastructure Framework;
 - to consider and respond to the issues and challenges that it raises;
 - to advise the GMCA and LEP on how best to move the challenges forward from the framework into an infrastructure programme.

Appendix 2: Table showing Approval for the Joint Plan

- 1 The following table sets out the date on which each GM local authority approved a change to it's constitution and delegating authority to AGMA and a Joint Committee to prepare the GMSF.

District	Full Council Approval
Bury	28/01/15
Bolton	25/02/15
Manchester	01/04/15
Oldham	04/02/15
Rochdale	21/01/15
Salford	21/01/15
Stockport	02/04/15
Tameside	24/02/15
Trafford	25/03/15

Wigan	14/01/15
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Table 2.1 GM Local Authority Constitution Change

2 Below are the approval dates for each stage of the Plan and the relevant Committee

Plan Stage	Committee	Date
Objectively Assessed Development Needs	AGMA Executive	14th November 2014
Vision, Strategy and Strategic Growth Options	Joint AGMA/GMCA Executive Board	30th October 2015
Draft Greater Manchester Spatial Framework	Joint AGMA/GMCA Executive Board	28th October 2016
Greater Manchester's Plan for Homes, Jobs and the Environment: Revised Draft of the Greater Manchester Spatial Framework	Joint AGMA/GMCA Executive Board	11th January 2019
Greater Manchester's Plan for Homes, Jobs and the Environment: Publication draft 2020	Joint AGMA/GMCA Executive Board	30th October 2020
Places for Everyone: Publication Plan	Joint Committee of the Nine	20th July 2021

Table 2.2 Plan Stage and Approval

- 3 Following each stage above the Plan was taken through the relevant GM districts committee cycle.
- 4 Following consideration of the Publication GMSF and all but one approved the GMSF for Publication and Submission. At the Stockport MBC Council meeting 17th November a report was taken seeking approval of the Publication and Submission GMSF and the majority of Committee Members votes against these recommendations. At its Council meeting on 3 December Stockport Council resolved not to submit the GMSF 2020 following the consultation period and at its Cabinet meeting on 4 December, it resolved not to publish the GMSF 2020 for consultation.
- 5 Following the departure of Stockport from the joint plan making process a Joint Committee of the Nine was established to continue to progress the PfE plan. The Table below shows the approval route for the Publication PfE and the various committee meetings from the Joint Committee to district committees.

District	Council	Exec/Cabinet
----------	---------	--------------

Joint Committee		20th July 2021
Bolton	28th July 2021	26th July 2021
Bury	28th July 2021	21st July 2021
Manchester	6th October 2021	28th July 2021
Oldham	21st July 2021	28th July 2021
Rochdale	28th July 2021	27th July 2021
Salford	21st July 2021	21st July 2021
Tameside	28th July 2021	28th July 2021
Wigan	21st July 2021	20th July 2021

Table 2.3 Publication PfE Approval Route

Appendix 3: Publication Draft Places for Everyone (January 2021 to Summer 2021)

- 1 See below Highways England's letter confirming the process for continued working with the PfE districts, TfGM and GMCA and the Memorandum of Understanding.



Highways England
Piccadilly Gate
Store St
Manchester
M1 2WD

Anne Morgan
Greater Manchester Combined Authority
Broadhurst House,
56 Oxford Street,
Manchester,
M1 6EU

17th June 2021

Dear Anne

Places for Everyone Joint Development Plan Document

Highways England recognise the importance of clear, long term plans to support economic growth and protect the environment and local communities. Places for Everyone (PFE) Joint Development Plan sets out plans for new homes and employment floorspace, over the plan period. We recognise PFE provides an important opportunity for nine Local Authorities in Greater Manchester to create the conditions for inclusive economic growth, to meet housing need, and protect and enhance the natural environment, with the support of appropriate transport infrastructure investment. We support the vision set out in the Greater Manchester Transport Strategy 2040 and will continue to play our part in delivering the interventions set out in the accompanying 'Our Five-Year Delivery Plan'. Transport interventions are a key part of the supporting infrastructure required to deliver the development plans identified in PFE and we recognise the progress being made with identifying supporting transport infrastructure in the latest documentation for the Plan, which is recognised to have the same effect as it's Greater Manchester Spatial Framework precursor.

We are committed to ongoing collaboration with the GMCA, the nine Greater Manchester Local Authorities, Transport for Greater Manchester (TfGM) and partners to deliver the aspirations of both PFE and other policies and plans for the city region. We will continue to do this through the successful Memorandum of Understanding (MoU) that has been in place for the last five years with TfGM.

We believe that PFE, along with GM's proposals in the Clean Air Plan and for tackling climate change, together set a framework for sustainable growth across the region. As such, Highways England will continue to work alongside our strategic partners to better understand the implications of this growth and will continue to investigate how we can make best use of the SRN to support the economy, connect people and places, and improve our environment.

The Strategic Road Network: Planning for the future - A guide to working with Highways England on planning matters describes the approach Highways England take to engaging in the planning system and the issues we look at when considering draft planning documents and planning applications. The advice and guidance will help steer the collaborative approach. In summary, as a proactive planning partner, we commit to:

Picture 3.1 Letter from Highways England Relating to PFE 17 June 2021

- engage early and at all relevant stages of the preparation of local plans and development proposals.
- work openly to support appropriate development of infrastructure options.
- share evidence to support the development of consistent and robust analysis as to the likely relationship between proposed developments and the SRN, including providing access to relevant data and traffic models.
- share knowledge and experience of how the SRN interacts with local roads and on the highways-related consequences that can arise from development.
- work collaboratively with you to help you prepare strong policies and proposals that are sustainable, practical and well designed.

To this end, Highways England is working with TfGM, and the GMCA, to examine the potential impacts of the Plan on the SRN. We are expecting that the work being led by TfGM will provide the information we need to understand, and guide future investment and operational decisions required to support the effective operation of the Strategic Road Network.

Furthermore, Circular 02/2013 (The strategic road network and the delivery of sustainable development) sets out the way in which Highways England will engage with communities and the development industry to deliver sustainable development and, thus, economic growth, whilst safeguarding the primary function and purpose of the Strategic Road Network. This Circular is the policy of the Secretary of State for Transport in relation to the Strategic Road Network, and the policies therein must be considered in conjunction with the National Planning Policy Framework (NPPF) and other national policies and guidance when formulating development plan documents.

Yours Sincerely

REDACTED

REDACTED

Development & Planning Manager (NW)

REDACTED

REDACTED

Picture 3.2 Letter from Highways England Relating to PfE 17 June 2021



Report of: Corporate Director of Place and Community

Relevant Portfolio Holder: Councillor Gaynar Owen

Contact for further information: Helen Hatch (Extn. 5171)
(Email: helen.hatch@westlancs.gov.uk)

SUBJECT: INFRASTRUCTURE FUNDING STATEMENT 2021

Wards affected: Borough-wide

1.0 PURPOSE OF THE REPORT

1.1 To introduce the CIL Infrastructure Funding Statement (IFS) for 2021 and seek approval to publish the report.

2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW AND SCRUTINY COMMITTEE

2.1 That the Committee note the content of the Infrastructure Funding Statement report and that the agreed comments of Executive Overview and Scrutiny Committee be passed to Cabinet for their consideration.

3.0 RECOMMENDATIONS TO CABINET

3.1 That the content of the Infrastructure Funding Statement is noted, and approval is given to publish it on the Council website.

3.2 That delegated authority is given to the Corporate Director of Place and Community, in consultation with the Portfolio Holder for Planning, to make any amendments to the Infrastructure Funding Statement, following its initial publication, to reflect the subsequent decisions of Cabinet regarding the CIL Funding Programme for 2022/23, and any other non-material amendments required, as set out in paragraph 5.9.

4.0 BACKGROUND

4.1 The Community Infrastructure Levy (CIL) allows local authorities in England and Wales to raise funds from new developments in their area, with the charges for

each liable development dependent on the use, size and location of the proposal. The imposition of the CIL charge is non-negotiable, and the revenue received by the Council must be used to pay for a wide range of infrastructure required to support new development.

- 4.2 CIL is administrated in accordance with the CIL Regulations 2010 (as amended). Until 2019, CIL Regulation 123 required charging authorities (Councils) to set out the types of infrastructure items / projects they intended to fund through CIL and was designed to prevent the double-charging of developers. This was known as the Regulation 123 (R123) list. In addition, Regulation 62 required Councils to report annually on their CIL receipts and expenditure through a CIL Report, and publish this on the Council webpages. As an extra measure, the Council's Annual Monitoring Report (AMR) also included a summary of CIL and S106 finances as well as providing an update on the delivery of infrastructure schemes across the Borough.
- 4.3 In September 2019, the government introduced a new set of amendments to the regulations which changed some of the requirements relating to how we must set out the infrastructure types / projects that are eligible to receive CIL funding, and how we must report receipts and expenditure on developer contributions. This included the removal of Regulation 123 (infrastructure list) and Regulation 62 (annual reporting) and the introduction of a new requirement.

5.0 THE INFRASTRUCTURE FUNDING STATEMENT (IFS)

- 5.1 CIL Regulation 121A (introduced by the 2019 amendments) now requires Councils to publish an Infrastructure Funding Statement each year, in December, to report receipts and expenditure relating to developer contributions. The IFS should also identify infrastructure needs, the total cost of this infrastructure, anticipated funding from developer contributions, and the choices the authority has made about how CIL contributions will be used. In doing so, authorities should consider known and expected infrastructure funding costs, taking into account other possible sources of funding to meet those costs. The process is intended to help the charging authority to identify the infrastructure funding gap and a levy funding target. It also enables local communities and developers to see how contributions are being spent, ensuring a transparent and accountable system.

Understanding and identifying infrastructure needs

- 5.2 Preparation of the CIL Charging Schedule (in 2013) saw the Council prepare a list of infrastructure items identified as necessary to support new development across the Borough, which subsequently identified a funding gap to evidence the need to charge an infrastructure levy on new development. The Council has developed this list into an Infrastructure Delivery Schedule (IDS) – a database containing details of all infrastructure projects identified as necessary across the Borough. The IDS fulfills two key purposes: i) to continue to provide the evidence of an aggregate funding gap to demonstrate a need for the community infrastructure levy; and ii) to provide the information upon which the Council will assess listed projects as to their suitability to receive CIL funding in the following financial year, in accordance with the Council's adopted Governance and Expenditure Framework for CIL and S106s (updated July 2020).

- 5.3 It is widely recognised that CIL cannot be expected to deliver all the necessary infrastructure and instead is designed as a mechanism to lever in match funding. The IDS therefore contains details of available match funding, where known. In many cases, it is difficult to pinpoint other funding sources, particularly for those projects planned beyond the short term (1-2 years). Government guidance states that any significant funding gap should be considered sufficient evidence of the desirability of CIL funding, where other funding sources are not confirmed.
- 5.4 The IFS sets out the Council's future spending priorities on infrastructure in line with the Council Vision and Priorities, so as to provide clarity and transparency for communities and developers on the infrastructure that is expected to be delivered. This includes setting out the infrastructure projects or types of infrastructure that the authority intends to fund, either wholly or partly, by the levy or planning obligations. This is not to dictate how funds must be spent, but to set out the local authority's intentions.
- 5.5 The IFS 2021 states the infrastructure types that we will continue to fund through CIL are:
- Strategic transport and highways improvement or provision
 - Strategic green infrastructure
 - Community facilities

The removal of pooling restrictions (2019 amendments) regarding CIL and planning obligations means that the Council now have more flexibility in using CIL and S106 monies together if they so wish, which means that CIL funding can be used to 'top up' any shortfall in funding that may be necessary to ensure the delivery of schemes funded primarily by S106 monies.

Planning obligations or planning conditions will continue to be used, where needed, on a site by site basis to secure affordable housing, education provision, on-site public open space and its future maintenance, and flood alleviation measures.

Identifying projects

- 5.6 The Council would like to save the majority of its CIL receipts to fund larger, costlier schemes that can deliver benefits to a wide number of its residents. However, the Council also want to balance this with delivering smaller, shorter-term projects that can bring immediate benefits. Consequently, each year, the Council will allocate up to £200,000 of CIL monies to 'smaller' infrastructure projects (each requiring less than £100,000 of CIL funding) that can be delivered in 1-2 years. The remainder of CIL monies will be 'saved up' until such time that larger, costlier schemes are identified and shown to be deliverable. This approach strikes an appropriate balance between delivering smaller-scale projects each year and collecting sufficient CIL funding to make a meaningful contribution to the delivery of larger-infrastructure projects.
- 5.7 To identify those smaller and/or short-term delivery schemes, each year, in accordance with the Council's Governance and Expenditure Protocol (2020), the Council works to identify and prioritise a number of infrastructure schemes which are suitable to receive CIL funding in the following financial year. These projects are drawn from the IDS and assessed against a set of criteria examining

deliverability, need, appropriateness and priority. Members are invited to comment on the shortlisted projects in summer, before the schemes are presented for public consultation in the early autumn. Final recommendations on the most appropriate schemes to receive CIL funding are then made to Cabinet for a final decision in late autumn / winter on the expenditure of CIL receipts.

- 5.8 This annual cyclical process is known as the 'CIL Funding Programme' and focuses primarily on those short-term delivery schemes each requiring less than £100,000 of CIL funding. However, it will also extend to include any schemes requiring more than £100,000 of CIL funding, and which, through the assessment process, are deemed suitable and deliverable within the two year period. These will also be subject to consideration by Cabinet, with a view to making a separate decision on allocating some of the saved CIL funding towards such larger projects.
- 5.9 As the recommendation at 3.2 sets out, it is proposed that authority is delegated to the Corporate Director of Place and Community, in consultation with the Portfolio Holder for Planning, to update Section 1.4 of the IFS with this year's CIL Funding Programme, once Cabinet have made their final decision (scheduled for January 2022 Cabinet meeting). This arrangement is a slight departure from that set within the CIL Governance and Expenditure Framework, wholly owing to recent revisions to the timetabling, and associated lead-in preparations, of committee meetings and officer's intent to ensure all comments received through the autumn consultation can be appropriately considered. This has necessitated a slight delay to the scheduling of the final Cabinet decision (from November to January). However, this approach will enable the Council to publish the IFS in December, as required by the CIL Regulations, with minor amendments to be made following Cabinet's decisions on the final CIL Funding Programme in January 2022.
- 5.10 The IFS must also identify any significant / larger, specific projects that CIL is anticipated to fund. For these schemes, it is expected to take several years to build up sufficient levels of receipts, and for all the necessary preparations to come into fruition – for example, obtaining planning permissions or additional finance. The Council expect that a significant proportion of the available strategic monies will be used on the following key schemes which will support delivery of the Council's key objectives, including ensuring people in the Borough can live healthy and fulfilling lives. These are:
- **The development of new leisure facilities:** New Leisure and Wellbeing Hubs are one of the Council's key priorities. The building of replacement leisure centres in Skelmersdale and Ormskirk was set out in the Leisure Facility and Contract Procurement report to Council in July 2018.
 - **Green infrastructure / cycling provision and improvements:** Including the 'West Lancs Wheel'; canal towpath improvements on the Leeds-Liverpool canal; the River Douglas Linear Park; the Ormskirk-Burscough Linear Park; and the Skelmersdale-Ormskirk Linear Park.

Estimating income

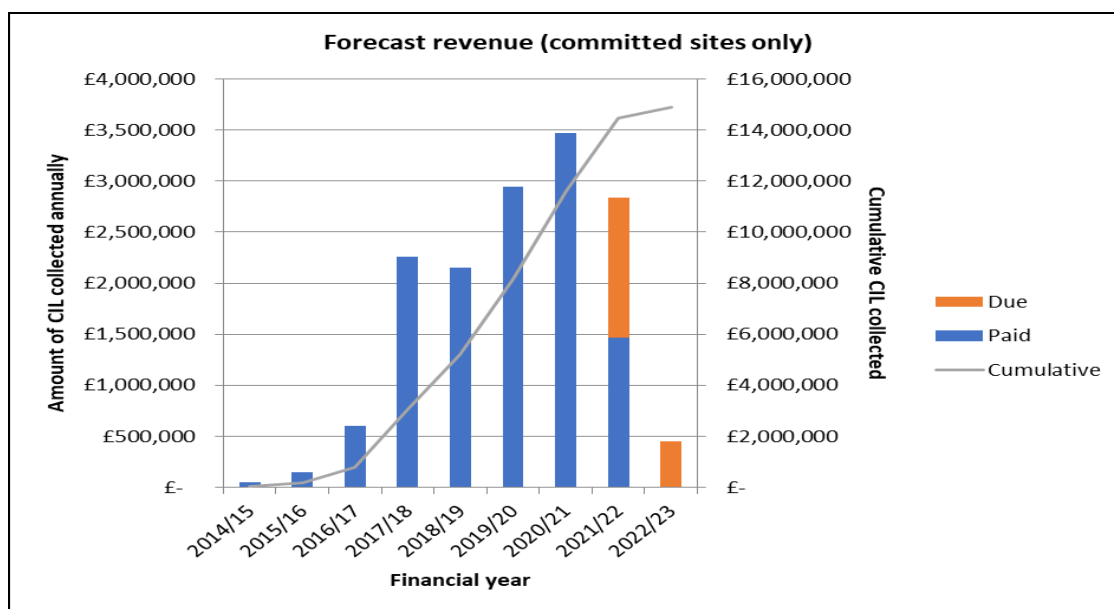
5.11 In order to give communities a better understanding of how infrastructure may be funded in the future, Councils should also use the IFS to report on estimated future income from developer contributions, where they are able to do so (although this is not a mandatory requirement of annual reporting under R121A). However, it should be stressed that anticipated future income is provided as a guide only as there is never any guarantee as to i) when developments will commence to trigger CIL payments or ii) that a developer will make payment on time. Therefore, estimates represent a given point in time and are subject to change.

5.12 Table 1 shows the amount of receipts the Council can expect to receive over the next few years. The figures are based on those developments that have already commenced, where most payments are due in instalments, and therefore does not include further developments, or phases, that will commence in the future triggering further CIL payments, or future planning permissions which will have new CIL liabilities attached to them.

Table 1: Forecast for CIL, based on commenced sites with committed monies (at July 2021)

	Actual / Forecast	Admin	NCIL	Strategic portion
2014-20	£8,146,638	£407,330	£1,185,850	£6,553,455
2020/21	£3,473,047	£173,652	£529,349	£2,770,046
2021/22	£2,802,521	£140,126	£460,808	£2,201,587
2022/23	£446,693	£22,335	£111,673	£312,685
Forecast Total 2021-23	£3,249,214	£162,461	£572,481	£2,514,272
Overall total	£14,868,899	£743,443	£2,287,680	£11,837,773

Figure 1: CIL monies received and due (at July 2021)



Progress with Infrastructure Delivery

5.13 During the reporting year (2020/21), a number of infrastructure schemes, funded through CIL or S106 monies, have been commenced and/or delivered. This

includes Hunters Hill Country Park improvements, Hesketh Bank Community Centre re-build and Ormskirk station pedestrian/cycle link improvements.

Receipts and Expenditure

5.14 Part Two of the IFS provides the reports on receipts and expenditure for both Section 106 planning obligations and CIL. Full details of both CIL and S106 receipts and expenditure are therefore detailed through a number of tables within the IFS.

5.15 During 2020/21, the Council:

- received over £3.4 million of CIL
- allocated £555,555 of 'strategic' CIL to six infrastructure projects
- transferred £529,349 to local councils
- allocated £68,000 of Ormskirk Neighbourhood CIL to two infrastructure projects

Since 2014, the Council have:

- collected £11.6 million of CIL
- allocated £1.6 million of 'strategic' CIL to twenty projects
- transferred almost £1.7 million to local councils
- allocated £200,000 of Ormskirk Neighbourhood CIL to five infrastructure projects

5.16 In 2020/21, the Council also collected £505,045 of S106 monies. The S106 money is to be used to fund site-specific requirements for public open space, education and transport, in accordance with the terms of the relevant planning agreements. In addition, three planning obligations were signed in 2020/21 to secure affordable housing.

5.17 Should Members have any suggestions as to how CIL and S106 monies could be used and require further details on the submission process for your proposal, then please contact the CIL Officer for guidance.

Reporting Neighbourhood CIL

5.18 15% (or 25% where there is a Neighbourhood Plan in place) of CIL monies collected in an area must be transferred to the local (parish or town) council so that the monies can directly benefit the area in which the development stemmed. Local councils must report on their Neighbourhood CIL (NCIL) receipts and expenditure, and therefore use of NCIL does not comprise part of this IFS. In those areas that have NCIL receipts but do not have a parish or town council (Ormskirk and Skelmersdale), the Council must retain the NCIL portion and spend it in consultation with the local community. As per the local council requirements, the Council must produce annual reports for those NCIL monies in our control and publish them online. Copies of all NCIL reports, including this years' annual NCIL Reports (2020/21) for Ormskirk and Skelmersdale, are published, as they are made available, at:

6.0 SUSTAINABILITY IMPLICATIONS

6.1 There are no significant sustainability effects associated directly with this article. Use of CIL and S106 monies have some implications on sustainability because they are used to provide public open space, environmental and transport improvements that can encourage healthier, fitter, more sustainable lifestyles and support access to employment. The IFS reports on intentions, delivery progress, receipts and expenditure but does not seek to make any recommendations as to the use of developer contributions. Such recommendations will be made, and approved by Cabinet, at the appropriate time.

7.0 FINANCIAL AND RESOURCE IMPLICATIONS

7.1 This update provides an overview of infrastructure delivery and CIL/S106 monies and does not seek to make recommendations for their use. This will be done through appropriate Cabinet reports at the relevant times. Therefore, there are no financial and resource implications to note through this article.

8.0 RISK ASSESSMENT

8.1 This item is for information only and makes no recommendations. It therefore does not require a formal risk assessment and no changes have been made to risk registers as a result of this article.

9.0 HEALTH AND WELLBEING IMPLICATIONS

9.1 This update provides an overview of infrastructure delivery and CIL/S106 monies and does not seek to make recommendations for their use. Therefore, there are no health and wellbeing implications to note through this item.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

There is no direct impact on members of the public, employees, elected members and / or stakeholders. Therefore, an Equality Impact Assessment is not required.

Appendices

Appendix A – Infrastructure Funding Statement 2021

Appendix B – Infrastructure Delivery Schedule extract

Appendix C – Minute of Executive Overview & Scrutiny Committee – 21 October 2021
(Cabinet only)



CIL Regulations 2010 (as amended)

Regulation 121A: Infrastructure Funding Statement

*Prepared in accordance with the requirements of the
Community Infrastructure Levy Regulations 2010 (as amended)*

Regulation 121A

**December 2021 Report
(for reporting year April 2020-March 2021)**

Heidi McDougall

Directorate of Place and Community

West Lancashire Borough Council

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PART A: INFRASTRUCTURE NEED AND DELIVERY

1.1 Developer contributions and the Infrastructure Funding Statement

Developer contributions are planning tools that can be used to secure financial and non-financial contributions, or other works, to provide infrastructure to support development and mitigate the impact of development. The term 'developer contributions' usually refers to the Community Infrastructure Levy (CIL) and planning obligations secured through Section 106 Agreements or Unilateral Undertakings.

Community Infrastructure Levy

The Community Infrastructure Levy (CIL) was introduced nationally in 2010 and allows local authorities in England and Wales to raise funds from developers who are undertaking new building projects in their area. The money can be used to pay for a wide range of infrastructure that is needed to support new development. The principle behind CIL is that most development has some impact on infrastructure and so should contribute to the cost of providing or improving infrastructure. CIL is governed by the CIL Regulations 2010 (as amended).

Planning obligations

A Planning Obligation is a legal agreement between a developer and the local planning authority (Council) where the developer agrees to provide contributions (either financially or in-kind) to offset negative impacts caused by construction and development. As such, Planning obligations assist in mitigating the impact of what would otherwise be unacceptable development to make it acceptable in planning terms.

Planning Obligations are secured via a planning agreement usually entered into under section 106 of the Town and Country Planning Act 1990 by a person with an interest in the land and the local planning authority or, more occasionally, via a unilateral undertaking entered into by a person with an interest in the land without the local planning authority. As a result, Planning Obligations are often referred to as S106s, and the term S106s and Planning Obligations may be used interchangeably throughout this Infrastructure Funding Statement to refer to the contributions secured through this kind of planning agreement.

Since the introduction of CIL, it has been the intention of the Government that the use of S106s should be 'scaled back' so that CIL is the main way in which infrastructure funding is collected. Therefore, whilst this Council uses CIL as the main mechanism, we continue to use S106s for site-specific infrastructure needs, and have a number of outstanding S106 contributions yet to be used that pre-date the introduction of CIL in West Lancashire in 2014.

Infrastructure Funding Statement

The CIL Regulations 2010 (as amended) set out how CIL monies must be administered, and how they relate to S106s. Under CIL Regulation 121A (introduced by the 2019 amendment),

from December 2020, local authorities must publish an Infrastructure Funding Statement (IFS) to identify infrastructure needs, the total cost of this infrastructure, anticipated funding from developer contributions and the choices the authority has made about how these contributions will be used (CIL Planning Practice Guidance paragraph 017¹). In doing so, authorities should consider known and expected infrastructure costs, taking into account other possible sources of funding to meet those costs.

This process is intended to help the charging authority to identify the infrastructure funding gap and a levy funding target. It also enables local communities and developers to see how contributions are being spent, ensuring a transparent and accountable system.

This statement will set out that information required by CIL Regulation 121A.

1.2 Establishing infrastructure needs

Preparation of the CIL Charging Schedule (in 2013) saw the Council prepare a list of infrastructure items identified as necessary to support new development across the Borough, which subsequently identified a funding gap to evidence the need to charge an infrastructure levy on new development. The Council has developed this list into an Infrastructure Delivery Schedule.

Infrastructure Delivery Schedule

The Council's Infrastructure Delivery Schedule (IDS) is a database containing details of all infrastructure projects identified as necessary across the Borough. Projects are typically identified by the Council in liaison with infrastructure and service providers but schemes may also be suggested by Councillors, Parish Councils or members of the public. The IDS fulfills two key purposes: i) to continue to provide the evidence of an aggregate funding gap to demonstrate a need for the community infrastructure levy; and ii) to provide the information upon which the Council will assess listed projects as to their suitability to receive CIL funding in the following financial year, in accordance with the Council's adopted Governance and Expenditure Framework for CIL and S106s.

A summary of the IDS is provided as an appendix to this report.

Identifying match funding

It is widely recognised that CIL cannot be expected to deliver all the necessary infrastructure and instead is designed as a mechanism to lever in match funding. In the interests of ensuring value for money, the Council will favorably consider those schemes that can provide match funding, although this is not a requisite of CIL funding and schemes without match funding may still receive CIL funds to enable delivery of the project.

¹ PPG Reference ID: 25-017-20190901

The IDS therefore contains details of available match funding, where known. In many cases, it is difficult to pinpoint other funding sources, particularly for those projects planned beyond the short term (1-2 years). Government guidance states that any significant funding gap should be considered sufficient evidence of the desirability of CIL funding, where other funding sources are not confirmed.

1.3 Use of CIL monies: infrastructure types and projects

The IFS should set out future spending priorities on infrastructure in line with the Council's plan policies, so as to provide clarity and transparency for communities and developers on the infrastructure that is expected to be delivered. The IFS should set out the infrastructure projects or types of infrastructure that the authority intends to fund, either wholly or partly, by the levy or planning obligations. This is not to dictate how funds must be spent, but to set out the local authority's intentions.

Infrastructure Types

Initially, the CIL Regulations 2010 (as amended) restricted Councils from pooling more than five obligations to fund the same item of infrastructure, and, for transparency, required that Councils set out the infrastructure items they intended to fund through CIL through a list – known as the Regulation 123 (R123) list. However, the 2019 amendments removed the pooling restriction, thereby enabling authorities to pool funding from different sources to fund the same infrastructure, provided that authorities set out in their IFS which infrastructure they expect to fund through the levy. The IFS therefore replaces the R123 list, and will set out the Council's intent for the use of CIL monies.

As per the previous R123 list, CIL will be used to fund the following infrastructure types:

- **Strategic transport and highways improvements or provision**, to include
 - cycle network provision and improvements
 - footpaths
 - bus stops

but excluding any works that should form part of a Section 278 agreement;

- **Strategic green infrastructure** including improvements to and provision of:
 - parks
 - amenity open space
 - play areas
 - outdoor sports facilities and playing pitches
 - semi-natural open space

but excluding any other onsite green infrastructure or public open space required by the most up to date planning policy in order to meet the needs of larger

development sites;

- **Community facilities** including libraries, health facilities, community centres, public realm, leisure centres.

Planning obligations or planning conditions will be used to secure the following infrastructure types, on a site by site basis:

- Affordable housing
- Education provision
- Onsite open space and future maintenance
- Flood alleviation measures

Unlike CIL, which applies to all developments, planning obligations are used to provide site-specific mitigation to address the impact of development on certain infrastructure in order to make a planning application acceptable in planning terms. As such, there is still a legitimate role for development-specific planning obligations, even where CIL applies, to ensure that the specific consequences of a development can be mitigated. Planning obligations must be i) necessary to make the development acceptable in planning terms; ii) directly related to the development; and iii) fairly and reasonably related in scale and kind to the development. These tests are statutory tests in CIL Regulation 122 and policy tests within the NPPF. Planning obligations for affordable housing should only be sought from major developments (those with a site capacity above 10 units) (Planning Obligations Planning Practice Guidance paragraph 023²).

Infrastructure Projects

Whilst the Council are keen to use CIL funding to deliver infrastructure projects in the short-term, the Council also wish to ensure that CIL is allowed to accumulate so as to save funds to support the delivery of larger, costlier schemes and medium to long-term projects.

Consequently, each year, the Council will allocate up to £200,000 of CIL monies to 'smaller' projects (each requiring less than £100,000 of CIL funding) that can be delivered in 1-2 years. The remainder of CIL monies will be 'saved up' until such time that larger, costlier schemes are identified and shown to be deliverable. This approach strikes a an appropriate balance between delivering smaller-scale projects each year and collecting sufficient CIL funding to make a meaningful contribution to the delivery of larger-infrastructure projects.

Smaller, short-term delivery projects

Each year, in accordance with the Council's Governance and Expenditure Framework for CIL and S106s (updated July 2020), the Council works to identify and prioritise a number of

² [PPG Reference ID: 23b-023-20190901](#)

infrastructure schemes as suitable to receive CIL funding in the following financial year. These projects are drawn from the IDS and assessed against a series of criteria examining deliverability, need, appropriateness and priority. Members are invited to comment on the shortlisted projects in summer, before the schemes are presented for public consultation in the early autumn. Final recommendations on the most appropriate schemes to receive CIL funding are then made to Cabinet for a final decision in late autumn / early winter on the expenditure of CIL receipts.

This annual, cyclical process is known as the 'CIL Funding Programme' and focuses primarily on those short-term delivery schemes each requiring less than £100,000 of CIL funding. However, it will also extend to include any schemes requiring more than £100,000 of CIL funding, and which, through the assessment process, are deemed suitable and deliverable within the two year period. These will also be subject to consideration by Cabinet, with a view to making a separate decision on allocating some of the saved CIL funding towards such larger projects.

The details of this process are outlined below in Section 1.4, and detailed within the Council's Governance and Expenditure Framework (updated July 2020). The actual projects which CIL will be used to fund will be identified and determined each year through the Council's annual CIL Funding Programme.

Larger, long-term delivery projects

However, this IFS must also identify any significant / larger, specific projects that CIL is anticipated to fund. The Council expect that a significant proportion of the available strategic monies will be used on the following key schemes which will support delivery of the Council's key objectives, including ensuring people in the Borough can live healthy and fulfilling lives.

These are:

- **The development of new leisure facilities**
New Leisure and Wellbeing Hubs are one of the Council's key priorities. The building of replacement leisure centres in Skelmersdale and Ormskirk was set out in the Leisure Facility and Contract Procurement report to Council in July 2018.
- **Green infrastructure / cycling and walking provision and improvements**
Including the 'West Lancs Wheel'; canal towpath improvements on the Leeds-Liverpool canal; the River Douglas Linear Park; the Ormskirk-Burscough Linear Park; and the Skelmersdale-Ormskirk Linear Park.

These schemes may take a longer time to deliver, perhaps as a result of land ownerships, planning permissions, feasibility studies, community consultation requirements or the availability of funding. The Council continue to progress these schemes "in the background"

and updates will be provided in future IFS's as and when information is known. As needed, reports will be taken to Cabinet to seek authority to allocate CIL funding to the above projects and types of infrastructure.

1.4 Annual CIL Funding Programme

Allocating funding to the value of £200,000

In July 2020, as part of the update to the Governance and Expenditure Framework, Council agreed that for all CIL monies collected each financial year from 1 April 2020 onwards, a maximum of £200,000 will be allocated through the CIL Funding Programme (CFP) each financial year towards projects individually requiring £100,000 of CIL funding or less.

Following consultation on the draft CIL Funding Programme, Cabinet have agreed to allocate CIL funding in the following financial year to the following schemes:

2021 CIL Funding Programme (for 2022/23)

- **This will be completed following Cabinet's decision in January 2022**

Allocating funding above the value of £200,000

The remainder of 'strategic' monies collected each financial year will be saved towards more significant infrastructure projects (requiring more than £200,000 of CIL funding) to be drawn down as necessary as such significant projects are identified and approved. Inevitably, such larger schemes are costlier to deliver and it takes time to build up the appropriate levels of CIL funding.

Following consultation on the draft CIL Funding Programme, Cabinet have agreed to allocate CIL funding in the following financial year to the following schemes:

"Saved" CIL funding allocated to projects for 2022/23

- **This will be completed following Cabinet's decision in January 2022**

Previous cabinet decisions on CIL funding allocations are reported through this Infrastructure Funding Statement (see Part B).

1.5 Anticipated CIL monies

The Government recommend that authorities report on estimated future income from developer contributions, where they are able to do so, in order to give communities a better understanding of how infrastructure may be funded in the future. However, this is not a mandatory requirement of annual reporting under R121A.

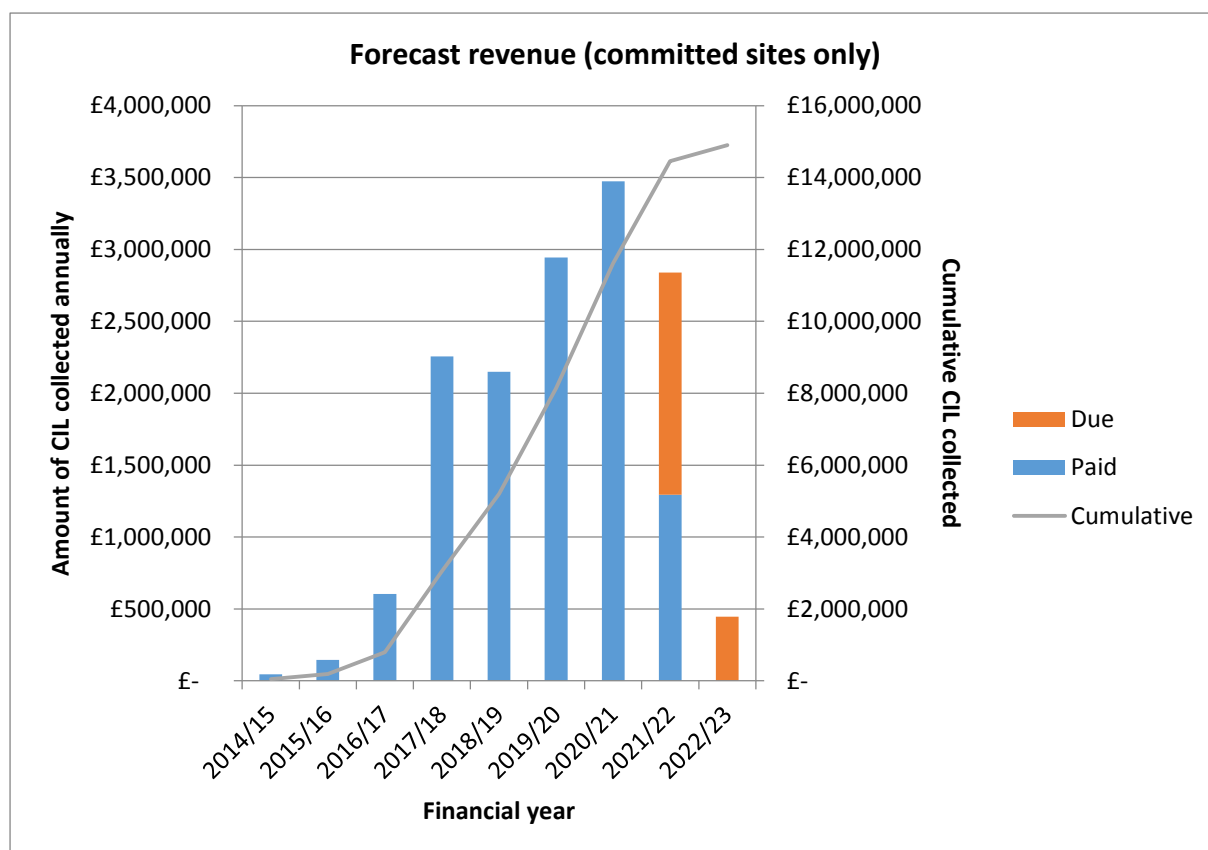
It should be stressed that anticipated future income is provided as a guide only. Payment of CIL is triggered upon the commencement of development, but this is dependent on the developer, and the Council cannot anticipate when developments will start. Furthermore, there is no guarantee that a developer will make payment at the relevant instalment dates, necessitating immediate payment or enforcement action which can affect the payment dates. Subsequently, the Council have provided indicative amounts based on those developments which have commenced, but estimates do not account for those developments that may commence in the future; where payment is not made on time; where enforcement action is required; or where surcharges and/or interest need to be applied. The estimates represent a given point in time and are always subject to change.

The CIL monies in the Table A1 below reflect the actual and forecast receipts. In accordance with the CIL Regulations, receipts must be split as follows: 5% to CIL administration costs, 15% to local councils as the Neighbourhood CIL (NCIL) portion (which rises to 25% for those areas which have an adopted Neighbourhood Plan), and the remaining 80% (or 70%) as the 'strategic portion' – which is that amount available to the Council to spend on infrastructure.

Table A1: Forecast for CIL, based on commenced sites with committed monies (at July 2021):

	Actual / Forecast	Admin	NCIL	Strategic portion
2014-20	£8,146,638	£407,330	£1,185,850	£6,553,455
2020/21	£3,473,047	£173,652	£529,349	£2,770,046
2021/22	£2,802,521	£140,126	£460,808	£2,201,587
2022/23	£446,693	£22,335	£111,673	£312,685
Forecast Total 2021-23	£3,249,214	£162,461	£572,481	£2,514,272
Overall total	£14,868,899	£743,443	£2,287,680	£11,837,773

Figure A1: CIL monies received and due (at July 2021)



1.6 CIL Payment in Kind

There may be circumstances where the Council and a person liable for the levy will want to pay the levy charge by providing land and/or infrastructure, instead of money. For example, there may be time, cost and efficiency benefits in accepting completed infrastructure in place of the levy. Payment in Kind (PiK) can enable developers, users and authorities to have more certainty about the timescale over which certain infrastructure items will be delivered.

The Council adopted a Payment in Kind policy in 2015. Subject to relevant conditions, and at its discretion, the Council may enter into an agreement for land and/ or infrastructure to discharge part or all of a levy liability.

At the time of writing, and in six years of CIL's operation, the Council have not received any requests for Payment in Kind. As any requests are expected to be on an 'ad-hoc' basis, we cannot anticipate how any future payments will be received or used.

Where Payment in Kind is agreed, this will be reported through the IFS.

1.7 Use of Section 106 planning obligations

Planning obligations must be used to deliver benefits to local communities that can offset the negative impacts caused as result of a specific development. The CIL Regulations 2010 (amended) state that obligations may only be used where it is:

- i) necessary to make a development acceptable in planning terms;
- ii) directly related to the development; and
- iii) fairly and reasonably related in scale and kind to the development.

Following the introduction of the Council's CIL charging schedule in 2014, the use of Planning obligations has been reduced, as the majority of funding should now stem from CIL. However, in accordance with the statutory tests governing the use of planning obligations, S106s will continue to be used to address site specific issues and to secure affordable housing, where those matters cannot be addressed through planning condition. This will be done on a site by site basis and in line with the adopted Local Plan and any relevant Supplementary Planning Documents (SPDs) in effect at the time of decision making.

S106s may be agreed for the following infrastructure types:

Transport and highways

As the Council is a two tier authority, site-specific transport and highways contributions are formally secured through S106 obligations based on requests from the Highways Authority (Lancashire County Council (LCC)), who is consulted on a site by site basis. In identifying site-specific needs, LCC will draw upon the West Lancashire Highways and Transport Masterplan, Route Management Strategy and Local Transport Plans. In relation to case by case site-specific highways improvements, LCC will still have the use of both S106 and Section 278 (S278) obligations, where localised conditions of a site require specific mitigation measures. These will continue to be communicated through individual consultation responses to development proposals. For clarity, both S106 and S278 obligations may only be used where the requirement meets the necessary statutory tests limiting the improvement to site specific measures. In addition, S106 and S278 obligations may only be used where the Council does not intend to fund such infrastructure improvements through CIL and have indicated this through the Infrastructure Funding Statement. An example could be specific junction improvements or highway widening.

Public open space

The provision of on-site public open space is currently secured based on the application of the standard requirements within the Provision of Public Open Space in New Residential Development SPD (July 2014), which sets out the requirements for securing adequate levels and types of public open space in new developments. Where development is of a substantial size, 40 units or more, policy requires that open space is delivered on-site and that maintenance of the open space is the responsibility of the developer. However, in exceptional circumstances, and where it can be justified, maintenance may be passed to the Council along with payment for a period of 10 years. Where this is the case, the developer

will be required to enter into a Section 106 Agreement with the Council to secure such funding.

Affordable housing

The provision of affordable housing is secured through S106 Agreements that are based on the Council's Affordable Housing Policy (RS2) within the West Lancashire Borough Council Local Plan 2012–2027 on a site by site basis and subject to viability constraints. This approach will remain unchanged and affordable housing will continue to be secured through the use of S106 Agreements or planning conditions, in line with the Local Plan's Affordable Housing Policy (RS2).

Education

While requests are rare, in certain circumstances it may be appropriate for contributions to education provision to be sought on some developments. Such contributions will continue to be secured through S106 agreements, where there is a demonstrated need for a specific development to contribute to such an improvement to make the development acceptable in planning terms and subject to development viability. LCC, as Education authority, will advise on a case by case basis as to when contributions are necessitated, based on the LCC Methodology for Education Contributions in Lancashire (2016).

Ecology

In some cases, the Council can seek to secure planning contributions to provide ecological improvements. Use of ecological planning obligations may increase with the emergence of biodiversity net gain.

Monitoring fees

The Council may now also charge fees for the monitoring of S106 obligation triggers, payments and projects. At the time of writing, the re-introduction of fees by this Council is still being explored.

1.8 Expenditure process for S106 monies

In July 2020, the Council adopted an updated Governance and Expenditure Framework which sets out how it will identify the use of S106 and CIL monies. This is published at <https://www.westlancs.gov.uk/media/545705/ge-framework-final.pdf>.

Broadly speaking, for planning obligations, proposals are invited from multiple sources and considered by officers/working groups to assess whether or not the proposal(s) meets the stipulations of the originating S106 agreement. Cabinet then make the final decisions on whether schemes are appropriate to receive funding.

More detailed information on each of the processed can be found within the Governance and Expenditure Framework.

1.9 Reporting CIL and S106

CIL PPG paragraph 179 categorises the types of infrastructure that should be included in reports on developer contributions. They include:

- affordable housing
- education
- health
- highways
- transport and travel
- open space and leisure
- community facilities
- green infrastructure

'Transport and travel' and 'open space and leisure' contributions have, historically, been collected by the Council via planning obligations but since the introduction of CIL it has been expected that these infrastructure types would be predominantly funded by the levy. However, site-specific needs can continue to be mitigated through planning obligations. Following the removal of the pooling restrictions (2019 amendments to the CIL Regulations), the Council may now pool contributions from multiple S106 obligations, and CIL, to fund the same infrastructure item.

1.10 Reporting Neighbourhood CIL

15% (or 25% where there is a Neighbourhood Plan in place) of CIL monies collected in an area must be transferred to the local (parish or town) council so that the monies can directly benefit the area in which the development stemmed. Local councils must report on their Neighbourhood CIL (NCIL) receipts and expenditure, and therefore use of NCIL does not comprise part of this IFS. Parish council reports are due by 31 December each year, and they must report on CIL monies for the previous financial year. Copies of all reports are published at:

<https://www.westlancs.gov.uk/planning/planning-policy/community-infrastructure-levy/cil-receipts-and-expenditure/annual-reports.aspx>

In those areas that have NCIL receipts but do not have a parish or town council (Ormskirk and Skelmersdale), the Council must retain the NCIL portion and spend it in consultation with the local community. We will produce annual reports for those NCIL monies in our control, and publish them at the above weblink.

2.0 Progress with Infrastructure Delivery

Progress with infrastructure delivery has previously been reported in the Annual Monitoring Report, but it is now more appropriate to include within the Infrastructure Funding Statement.

2.1 Infrastructure Delivery Plan

The Council's Infrastructure Delivery Plan (IDP) seeks to identify the infrastructure required to support the West Lancashire Local Plan. Infrastructure is essential to support increased housing provision and economic growth, to mitigate climate change impacts, and to create thriving and sustainable communities. The IDP provides the background evidence regarding the infrastructure likely to be required to support the development identified in the Local Plan by setting out when, where, and by whom actions will take place to deliver development, as well as gaps / hotspots of infrastructure stress or deficiency.

The IDP was first prepared in 2012 to support the Local Plan 2012-2027 and is updated with the development of each Local Plan. A new IDP will be prepared as the Local Plan 2040 progresses.

2.2 Infrastructure Delivery Schedule

The Infrastructure Delivery Schedule (IDS) outlines the specific details of infrastructure projects and schemes. The IDS is regularly monitored and updated to provide an up-to-date account of all infrastructure projects required and their status. The IDS is also used to inform which infrastructure schemes are the most appropriate for shortlisting and prioritising through the Community Infrastructure Levy (CIL) Funding Process.

The IDS is regularly reviewed to check the status of current projects, and to add any further projects as and when they are identified as necessary. Implementation of projects often relies on funding, and the Council works with delivery partners to help secure the finances to enable schemes. The IDS informs the identification and prioritisation of those projects to receive funding from revenue collected through CIL.

The current IDS, as at August 2021, can be found as an Appendix to this report. It excludes those projects that are in progress, or which have been completed.

2.3 Delivery of approved schemes

As explained in section one, there is a formal process for approving projects to be funded using CIL, or NCIL, monies. In addition, projects using S106 monies must also be approved by Council Cabinet. The lists below outline those S106, CIL and NCIL schemes that have been granted approval, and their status in spring 2021 (as this IFS must report on the 20/21 financial and monitoring year).

Status of Infrastructure schemes, funded by developer contributions, in 20/21

Those projects in red relate to 'new' schemes awarded funding in 2020/21.

Project	Source	Funding	Status
Tawd Valley Park cycleway	S106	£200,000	Completed
Tarleton Carr Lane Pavilion store	S106	£30,513	Completed
Outdoor gym, Station Rd, Hesketh Bank	S106	£12,540	Completed
Sensory garden, Halsall	S106	£5,500	Completed
Pine Grove link, Ormskirk	S106	£10,000	Completed
Burscough CC Environmental improvements	S106	£21,292	Completed
MUGA, Pickles Drive, Burscough	S106	£40,000	Completed
Play area, Highsands Avenue, Rufford	S106	£43,000	Completed
MUGA, Rufford village hall	S106	£43,000	Completed
MUGA at Ennerdale, Skelmersdale	S106	£32,169	Completed
Tawd Valley Masterplan phase 1	S106	£175,000	In progress
Tawd Valley Masterplan phase 2	S106	£103,590	In progress
Ormskirk Cycle and pedestrian network	S106	£95,000	In progress
Digmoor bus stop improvements	S106	£10,000	In progress
Edge Hill cycle link Phase 2	S106	£103,860	In progress
Edge Hill cycle link Phase 2	S106	£276,480	In progress
Skelmersdale allotments	CIL	£20,000	Completed
Station Approach car park improvements	CIL	£15,000	Completed
Haskayne Cutting nature reserve boardwalk	CIL	£8,000	Completed
Burscough towpath improvements	CIL	£150,000	Completed
Stanley Coronation Park improvements	CIL	£20,000	Completed
Mere Sands Wood Visitor Centre Phase II	CIL	£25,000	Completed
Whittle Drive playing field facilities	CIL	£40,000	In progress
Tawd Valley Masterplan	CIL	£300,000	In progress
Chequer Lane playing field facilities	CIL	£60,000	Withdrawn
Hunters Hill Country Park improvements	CIL	£60,000	Completed
Sluice Lane PROW improvements	CIL	£31,000	Withdrawn
Hesketh Bank Community Centre	CIL	£100,000	Completed
Tawd Valley play area provision	CIL	£225,000	In progress
Cheshire Lines Path improvements	CIL	£40,000	In progress
Long Heyes, Ashurst play area	CIL	£30,000	Completed*
The Cloughs environmental improvements	CIL	£50,000	In progress
Helmsdale replacement play area	CIL	£19,000	In progress
Dial-a-ride demand responsive transport	CIL	£31,555	In progress
Parbold-Appley Bridge towpath improvement	CIL	£385,000	In progress
Play area at Thompson Avenue, Ormskirk	NCIL S106	£29,000 £11,000	Approved
Ormskirk Bus/Rail pedestrian/cycle link	CIL S106	£53,000 £79,579	Completed
Ormskirk gyratory improvements	NCIL	£50,000	In progress
West End playing field	NCIL	£58,000	In progress
Halsall Lane Park play area	NCIL	£10,000	In progress

Due to circumstances beyond the control of the Council, it has not been possible to deliver certain projects (Chequer Lane, the Sluice Lane PROW), within the two year timeframe, and so the projects have been withdrawn and the monies have been returned to the CIL funding pot. If funding is still sought, then new funding bids will need to be made in the future.

*Long Heyes play area was granted CIL funding by Cabinet in November 2020, for use in the financial year 2021/22. However, due to other works being undertaken on that site early in 2021, and to ensure best value, these works were completed in advance of the funding year. A Record of Decision will seek to authorise this deviation from the original Cabinet approval.

PART B: REPORTING CIL & S106 RECEIPTS AND EXPENDITURE

3.0 Receipts and Expenditure for the financial year 2020/21

A	The total value of CIL set out in all demand notices <u>issued</u> in the reported year	£2,042,110
B	The total amount of CIL receipts for the reported year	£3,473,047
C	The total amount of CIL receipts collected before the reported year which have not been allocated	£5,556,455
D	The total amount of CIL receipts collected before the reported year which have been allocated in the reported year	£385,000 (Parbold -Appley Bridge towpath)
E	The total amount of CIL expenditure for the reported year	£212,048
F	The total amount of CIL receipts, whenever collected, which were allocated but not spent during the reporting year	£786,771
G	In relation to CIL expenditure for the reported year, summary details of:	
	i) The items of infrastructure on which CIL (including land payments) has been spent, and the amount of CIL spent on each item	See Table 2
	ii) The amount of CIL spent on repaying money borrowed, including any interest, with details of the items of infrastructure which that money was used to provide (wholly or in part)	£0
	iii) The amount of CIL spent on administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of CIL collected in that year in accordance with that regulation	£173,652 5%
H	In relation to CIL receipts, whenever collected, which were allocated but not spent during the reported year, summary details of the items of infrastructure on which CIL (including land payments) has been allocated, and the amount of CIL allocated to each item	See Table 2
I	The amount of CIL passed to	
	i) Any parish council under regulation 59A or 59B	See Table 3
	ii) Any person under Regulation 59(4)	£0

Note: 59A relates to the duty to pass the local CIL portion to local councils. 59B governs CIL paid through land or infrastructure and where payments to a local council must be paid in money.

Table 1: CIL Receipts and apportionment; Allocations and expenditure

	Total CIL receipts	Admin portion	Meaningful, or neighbourhood, portion	Strategic portion	Total CIL receipts allocated to strategic schemes	Total CIL receipts unallocated (cumulative)	Total CIL spent	CIL spent in reported year (2020/21)	CIL returned to pot in reported year
2014/15	£45,703	£2,285	£6,855	£36,562	£43,000	£110,083	£43,000	-	-
2015/16	£144,959	£7,247	£21,190	£116,521					
2016/17	£603,834	£30,191	£89,982	£483,660	£173,000	£420,743	£173,000	-	-
2017/18	£2,257,038	£112,852	£338,310	£180,5877	£425,000	£1,801,620	£291,403	£67,038	-
2018/19	£2,150,247	£107,512	£308,627	£173,4107	£91,000	£3,444,727	£60,000	£45,010	-
2019/20 receipts	£2,944,857	£147,243	£420,885	£2,376,729	£325,000	£5,556,455 (C) (Includes £60,000 returned)	£100,000	£100,000	£60,000
2020/21 receipts	£3,473,047 (B)	£173,652 (G(iii))	£529,349	£2,770,046 (L(i))	£555,555	£7,801,946 (Includes £31,000 returned)	£0	£0	£31,000*
Total	£11,619,685	£580,983	£1,175,199	£9,323,501	£1,612,555 (includes since returned £60,000 & £31,000)	£7,801,946 (includes returned £60,000 & £31,000)	£667,403	£212,048 (E)	£91,000

Note: i) Numbers may not sum to due to rounding; ii) Return of monies from withdrawn projects may result in double-counting being reported (i.e. a sum may be reported as both allocated, and then, latterly, unallocated)

*Due to circumstances beyond the Council's control, it has not been possible to deliver two projects within the specified two years, and so the money has been returned to the strategic pot. Should the projects be deliverable in the future, a new bid for monies will need to be made through the CIL Funding Programme. In 2020/21, £31,000 was returned from the Sluice Lane PROW project.

Table 2: CIL funded projects and expenditure (G(i), H)

Year awarded	Projects	Allocations	Year allocated	Spent						Returned as unspent	Allocated but unspent
				2015/16	2016/17	2017/18	2018/19	2019/20	2020/21		
2014-2019	Skem. Allotments	£20,000	2015/16	-	£20,000						-
	Station Approach	£15,000	2015/16	-	£15,000						-
	HCNR Boardwalk	£8,000	2015/16	-	£8,000						-
	Burscough towpath	£150,000	2016/17	-	-	£150,000					-
	Stanley Park, Skem	£20,000	2016/17	-	-		£20,000				-
	MSW Visitor Ph1	£3,000	2016/17	-	-	£3,000					-
	MSW Visitor Ph2	£25,000	2017/18	-	-	-	£25,000				-
	Chequer Lane play	£60,000	2017/18	-	-	-				£60,000	-
	Whittle Drive play	£40,000	2017/18	-	-	-	£2,094	£525			£37,381
	Tawd Valley Park	£300,000	2017/18	-	-	-	£14,011	£182,736	£67,038		£36,216
	Hunters Hill	£60,000	2018/19	-	-	-	-	£14,990	£45,010		-
Sluice Lane PROW	£31,000	2019/20	-	-	-	-	-	-	£31,000	-	
2019/20	Hesketh Bank CC	£100,000	2020/21	-	-	-	-	-	£100,000		-
	Tawd Valley play area	£225,000	2020/21	-	-	-	-	-	£0		£225,000
2020/21	Cheshire Lines	£40,000	2021/22	-	-	-	-	-	-		£40,000
	Long Heyes play area	£30,000	2021/22	-	-	-	-	-	£30,000		-
	The Cloughs environmental works	£50,000	2021/22	-	-	-	-	-	-		£50,000

	Helmsdale rplay area	£19,000	2021/22	-	-	-	-	-	-		£19,00
	Dial-A-Ride	£31,555	2021/22	-	-	-	-	-	-		£31,555
	Parbold-Appley Bridge towpath improvements	£385,000 (D)	2021/22	-	-	-	-	-	-		£385,000
Total		£1,612,555							£212,048 (E)	£91,000	£854,152 (F)

Table 3: CIL monies transferred to local councils (i(i))

Parish	Neighbourhood CIL (Meaningful proportion) transferred to local (Parish) council								Total returned under R59F
	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total	
Aughton	£107	£4,681	£14,382	£27,857	£6,013	£22,439	£13,916	£89,395	-
Bickerstaffe	-	-	-	-	£4,633	-	-	£4,633	-
Bispham	-	-	-	-	-	-	-	£0	-
Burscough	£1,683	-	£56,808	£116,569	-	£39,367	£101,068	£318,495	-
Dalton	-	-	-	-	-	£909	-	£909	-
Downholland	-	-	-	-	-	-	£2,296	£2,296	-
Great Altcar	-	-	-	-	-	-	-	£0	-
Halsall	-	-	-	-	£18,482	£21,904	£13,171	£53,557	-
Hesketh-with-Beaconsall	£3,486	£4,126	£8,871	£6,052	£21,817	£27,540	£52,283	£124,175	-
Hilldale	-	-	£864	-	-	-	-	£864	-
Lathom	-	-	-	£637	-	£5,464	-	£6,101	-
Lathom South	-	-	-	£15,199	£46,888	£56,960	-	£119,047	-
Newburgh	-	-	-	-	-	-	£1,522	£1,522	-
North Meols	-	-	-	£3,682	-	-	-	£3,682	-
Parbold	-	-	£4,801	£14,649	-	-	-	£19,450	-
Rufford	-	-	-	-	-	£19,797	£18,577	£38,374	-
Scarisbrick	-	-	£1,454	£4,447	-	£1,711	£9,895	£17,507	-
Simonswood	-	-	-	-	-	-	-	£0	-
Tarleton	-	-	£2,803	£27,982	£11,003	£51,353	£94,453	£187,595	-
Unparished - Ormskirk	-	-	-	£114,993	£199,117	£95,173	£82,076	£491,361	-
Unparished - Skelmersdale	-	-	-	-	-	£16,581	£16,714	£33,295	-
Up Holland	£1,352	£10,149	-	-	£673	£61,688	£123,377	£197,239	-
Wrightington	£228	£2,234	-	£3,242	-	-	-	£5,704	-
Total	£6,855	£21,190	£89,983	£338,310	£308,627	£420,885	£529,349	£1,715,200	-

J	Summary details of the receipt and expenditure of CIL to which regulation 59E or 59F applied during the reported year, including –	
i)	The total receipts that regulations 59E and 59F applied to	59E - £0 59F – See Table 4 & 5
ii)	The items of infrastructure to which the CIL receipts to which regulations 59E and 59F applied have been allocated or spent, and the amount of expenditure allocated or spent on each item	See Table 4 and 5

Note on 59E: Where local (Parish) Councils do not spend their CIL monies within five years of receipt, or fail to spend them on infrastructure items, the Borough Council can request the return of the monies.

Note on 59F: In non-Parished areas, the Borough Council retains the local portion and must spend it in consultation with the local community on projects within that area. The only non-Parished monies collected belong to Ormskirk.

K	Summary details of any notices served in accordance with regulation 59E, including -	
i)	The total value of CIL receipts requested from each parish council	£0
ii)	Any funds not yet recovered from each parish council at the end of the reporting year	£0
L	The total amount of -	
i)	CIL receipts for the reported year retained at the end of the reported year other than those to which regulation 59E or 59F applied	See Tables 1-3
ii)	CIL receipts from previous years retained at the end of the reported year other than those to which regulation 59E or 59F applied	See Tables 1-3
iii)	CIL receipts for the reported year to which regulation 59E or 59F applied retained at the end of the reported year	£0
iv)	CIL receipts from previous years to which regulation 59E or 59F applied retained at the end of the reported year	£0

Table 4: Ormskirk neighbourhood portion (non-parished area)(J,K,L)

Year collected	Neighbourhood portion received	Projects	Allocations	Year allocated	Spent						Allocated but unspent	Un-allocated
					15/16	16/17	17/18	18/19	19/20	20/21		
2014-2019	£126,614	Ormskirk gyratory traffic improvements	£50,000	2018/19	-	-	-	-	-	£25,000	£25,000	£23,614
		Cycle and pedestrian links	£53,000	2018/19	-	-	-	-	-	£53,000	£0	
2019/20	£187,497	Thompson Avenue play area	£29,000	2019/20	-	-	-	-	-	-	£29,000	£158,497
2020/21	£107,941	West End playing fields	£58,000	2020/21	-	-	-	-	-	-	£58,000	£39,941
2020/21		Halsall Lane park play area	£10,000	2020/21	-	-	-	-	-	-	£10,000	
Total	£422,052		£200,000							£78,000	£122,000	£222,052

Table 5: Skelmersdale neighbourhood portion (non-parished area)(J,K,L)

Year collected	Neighbourhood portion received	Projects	Allocations	Year allocated	Spent					Allocated but unspent	Unallocated
					2015/16	2016/17	2017/18	2018/19	2019/20		
2014-2019	£0	None	-	-	-	-	-	-	-	-	n/a
2019/20	£16,581	None	-	-	-	-	-	-	-	-	£16,581
2020/21	£16,714	None	-	-	-	-	-	-	-	-	£16,714
Total	£33,295		£0							n/a	£33,295

4.0 Report on S106 Monies for the reporting financial year (2020/21)

Section 106 (S106) agreements, also known as planning obligations, are an agreement between the Council and a developer, made at the end of a planning application stage, whereby the developer agrees to provide contributions to offset likely negative impacts associated with the proposed development being applied for. Historically in West Lancashire, contributions have been accepted for open space, public transport, infrastructure or services, footpath / cycleways and community facilities (e.g. health, leisure and education facilities) and have been used to secure on-site affordable housing.

This report summarises receipts and expenditure for planning obligations (S106 agreements). It should be noted that from 1 September 2014, the Council have collected the majority of developer contributions through the Community Infrastructure Levy (CIL).

A	The total amount of money to be provided under any planning obligations which were entered into during the reported year	£314,185.25
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Monies agreed to be provided through planning obligations during 2020/21

Planning Application	Site	Provision for	S106 Sum Due upon trigger	Value
2018/0837/FUL	Burscough AFC, Burscough	3 secondary school places	100% upon the sale of the 20th shared ownership property	£69,185.25
2018/1304/OUT	Land at ORM Works, Railway Road, Skelmersdale	Provision/delivery of part of the Ormskirk-Skelmersdale linear park	50% on completion of sale of 30th dwelling and 50% on completion of sale of the 50th dwelling on the development	To be determined at RMA (number of dwellings x £1284)
2019/1093/FUL	Yew Tree Farm, Burscough	Junction improvements at Liverpool Road South/Square Lane junction - subject to findings of monitoring	Upon completion of the deed	£245,000

		strategy.	
Total			£314,185.25

B	The total amount of money under any planning obligations which was received during the reported year (2020/21)	£505,045
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Monies received during 2020/21

Planning Application	Site	Provision for	Amount received
2012/1224/OUT	Land at Abbey Lane, Burscough	A Linear park (or POS if unspent within 7 years).	£129,000
2013/1138/FUL	9 Shore Road, Hesketh Bank	Providing new and/or the enhancement of existing / future areas of public open space within the local area	£11,045
2019/1093/FUL	Yew Tree Farm, Buscough	Junction improvements at Liverpool Road South/Square Lane junction - subject to findings of monitoring strategy.	£245,000
2013/1060/WL3	Whalleys, Skelmersdale	Provision of quality bus stops	£15,000
2013/1060/WL3	Whalleys, Skelmersdale	Provision of new off-road pedestrian /cycle lane as a continuation of the public right of way linking Cobbs Brow Lane to Summer Street payable	£90,000
2013/1060/WL3	Whalleys, Skelmersdale	Provision of such pedestrian or cycle links as the council considers reasonably necessary	£15,000
Total			£505,045

C	The total amount of money under any planning obligations which was received <u>before</u> the reported year which has not been allocated by the authority	£526,573
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Monies received (excluding that received in 2020/21) but not allocated by the authority

Public Open Space	Transport	Ecology	Education	Total
£371,870	£144,703	£0	£0	£516,573

Note: Some monies collected are, by the wording of the agreement, allocated for a specific purpose. The above table therefore shows figures for those agreements that are more generic wording, for example, 'provision of open space' and where proposals for the use of those monies can be invited.

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D	Summary details of any non-monetary contributions to be provided under planning obligations which were entered into during the reported year, including details of -	
	i) In relation to affordable housing, the total number of units which will be provided	
	ii) In relation to educational facilities, the number of school places for pupils which will be provided, and the category of school at which they will be provided	

Non-monetary contributions agreed during the reported year (2020/21)

Planning Application	Site	Number of affordable housing units (AHU)	Number / type of school places
2019/0936/ARM Deed of Variation	Land rear of 38 Newarth Lane, Hesketh Bank	10 (100% AHU scheme)	-
2018/0837/FUL	Burscough AFC, Burscough	52 (100% AHU scheme)	3 secondary school places
2017/0907/OUT	Former Martin Inn, Martin Lane, Burscough	8 (100% AHU scheme)	-
Total		70 units (inc Deed of Variation)	3 places

E	The total amount of money (received under any planning obligations) which was allocated but not spent during the reported year for funding infrastructure	£105,000
F	In relation to money (received under planning obligations) which was allocated by the authority but not spent during the reported year, summary details of the items of infrastructure on which the money has been allocated, and the amount of money allocated to each item	See table below

Details of monies allocated to infrastructure projects during 2020/21

Planning Application	Originating development site	Monies allocated	Monies allocated and spent	Monies allocated and unspent	Project	Decision by:
2009/1052/FUL	Edge Hill University, Ormskirk	£103,680	£103,680	£0	Edge Hill Cycle link Phase 2	Cabinet, September 2020
2011/1079/FUL	Edge Hill University, Ormskirk	£276,480	£0	£276,480	Edge Hill Cycle link Phase 2	Cabinet, January 2021

2012/0887/FUL	1 Hattersley Way, Ormskirk	£95,000	£0	£95,000	Cycle and pedestrian improvements in Ormskirk town centre	Cabinet, January 2021
2012/0456/FUL	Digmoor Business Site, Skelmersdale	£10,000	£0	£10,000	Bus stop improvements	Cabinet, March 2021
Total			£103,680	£381,480		

G	The total amount of money (received under any planning obligations) which was spent by the authority (including transferring it to another person to spend)	£172,102
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	In relation to money (received under planning obligations) which was spent by the authority during the reported year (including transferring it to another person to spend), summary details of -	
	i) The items of infrastructure on which that money (received under planning obligations) was spent, and the amount spent on each item	See table below
	ii) The amount of money (received under planning obligations) spent on repaying money borrows, including any interest, with details of the items of infrastructure which that money was used to provide (wholly or in part)	£0
	iii) The amount of money (received under planning obligations) spent in respect of monitoring (including reporting under regulation 121A) in relation to the delivery of planning obligations	£0

Planning Application	Originating development site	Amount spent	Project
2012/0591/HYB	Land at Greaves Hall, Banks	£3,150	Owl habitat improvements at Hesketh Out Marsh

2018/1090/ARM	Whalleys Site 2, Skelmersdale	£,8804	Tawd Valley Phase 2
2009/0733/FUL	Owl & Pussycat, Egerton, Skelmersdale	£18,030	Tanhouse MUGA improvements
2007/1254/FUL	Land off Tanhouse Road, Skelmersdale	£14,139	Tanhouse MUGA improvements
2014/0034/FUL	Land at Sandcross Service Station, Sandbrook Road, Tontine	£13,254	Abbey Lakes Environmental improvements
2013/0296/FUL	Land rear of 32 Parliament Street, Up Holland	£11,045	Abbey Lakes Environmental improvements
2009/1052/FUL	Edge Hill University, Ormskirk	£103,680	Cycle link Phase 2

I	The total amount of money (received under any planning obligations) during any year which was retained at the end of the reported year, and where any of the retained money has been allocated for the purposes of longer term maintenance (“commuted sums”) also identify separately the total amount of commuted sums held.	£0 The Council do not collect or use commuted sums for the purposes of maintenance
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SUMMARY TABLES

*Monies raised through Section 106 for **Public Open Space**, by Ward (July 2021)*

Ward	Collected	Spent	Allocated and unspent	Unallocated
Ashurst	£434,815	£184,426	£94,786	£155,603
Aughton & Downholland	£110,846	£110,846	-	-
Aughton Park	£94,633	£94,633	-	-
Bickerstaffe	£11,819	£11,819	-	-
Birch Green	-	-	-	-
Burscough East	£117,734	£39,227	£35,000	£43,507
Burscough West	£299,972	£60,925	£177,070	£61,977
Derby	£318,245	£307,245	£11,001	-
Digmoor	-	-	-	-
Halsall	£36,636	£36,636	-	-
Hesketh with Becconsall	£107,811	£96,766	-	£11,045
Knowsley	£194,500	£194,500	-	-
Lathom	£36,000	£36,000	-	-
Lathom South	£50,000	-	£50,000	-
Moorside	-	-	-	-
Newburgh	-	-	-	-
North Meols	£288,392	£136,812	£120,000	£31,580
Parbold	£99,800	£99,800	-	-
Rufford	£96,874	£96,874	-	-
Scarisbrick	£72,419	£28,560	-	£43,859
Scott	£7,335	£7,335	-	-
Skelm. North	£13,254	£13,254	-	-
Skelm. South	£98,370	£98,370	-	-
Tanhouse	£32,169	£32,169	-	-
Tarleton	£313,853	£143,853	£170,000	-
Up Holland	£158,107	£148,808	-	£13,254
Wrightington	£118,094	£96,004	-	£22,090
Total	£3,111,678	£2,074,861	£657,857	£382,915

Notes

1. *Following negotiations between the developers and the Council, some payments are accepted in instalments to help protect the viability of the development*
2. *Potential monies are where the trigger for payment has not yet been met, or where monies are due but payment is pending.*
3. *Due monies are where the trigger for payments has been met, and monies are payable in line with agreed future timescales, or are with the WLBC legal team for enforcement action.*
4. *In some wards, the potential monies figure may increase as a result of a S106 on an outline permission; where the sum due may only be calculated at reserved matters stage at which point the actual size of the development is known.*
5. *No S106 money has been raised for POS in Birch Green, Digmoor, Moorside, or Newburgh wards.*

Monies raised through Section 106 for Ecology

Ward	Collected	Allocated & spent	Allocated & unspent	Potential (\$106 signed, triggers pending)	Of which, being pursued by Legal
North Meols	£3,150	£3,150	£0	0	0
Up Holland	£20,000	£20,000	£0	0	0
Total	£23,150	£23,150	£0	0	0

£20,000 was received in Up Holland for habitat improvements for farmland birds, of which £15,885 has been spent at Mere Sands Wood, and £4115 has been spent on improvements at Scutchers Acres. £3150 was spent providing improvements to owl foraging habitat at Hesketh Out Marsh.

Monies raised through Section 106 for Education

Ward	Collected	Spent	Allocated and unspent	Unallocated	Potential (triggers pending)	Due
Burscough	-	-	-	-	£69,185	-
Downholland	-	-	-	-	£155,292	-
Halsall	-	-	-	-	£142,125	-
Rufford	-	-	-	-	£80,253	-
Scarisbrick	£42,846	-	£42,846	-	-	-
Scott	£47,475	-	£47,475	-	-	-

Notes: Lancashire County Council is responsible for identifying the need for planning obligations to provide school places, and then to provide those school places. The Borough Council notify LCC of receipt and continue to liaise with them with regard to the use of the monies. In some cases, LCC chase due payment themselves.

Monies raised through Section 106 for Monitoring

Collected	Spent	Allocated and unspent	Unallocated	Potential (triggers pending)	Due
£15,169	-	-	-	-	£472

Notes: Councils are able to charge a fee to cover the administration costs of monitoring S106 obligations, for example triggers, payments and subsequent projects

Monies raised through Section 106 for **Transport**, by Ward (July 2021)

Ward	Collected	Spent	Allocated and unspent	Unallocated	Returned to developer
Ashurst	£255,000	-	£240,000	£15,000	-
Aughton & Downholland	-	-	-	-	-
Aughton Park	-	-	-	-	-
Bickerstaffe	-	-	-	-	-
Birch Green	£200,000	£200,000	-	-	-
Burscough East	-	-	-	-	-
Burscough West	£345,000	£4,283	£340,717	-	-
Derby	£560,960	£276,480	£284,480	-	-
Digmoor	£10,000	-	£10,000	-	-
Halsall	£15,000	-	-	£15,000	-
Hesketh with Becconsall	-	-	-	-	-
Knowsley	£22,000	£22,000	-	-	-
Lathom	-	-	-	-	-
Lathom South	-	-	-	-	-
Moorside	-	-	-	-	-
Newburgh	-	-	-	-	-
North Meols	£105,000	£5,344	£99,656	-	-
Parbold	-	-	-	-	-
Rufford	£46,000	-	£16,000	£30,000	-
Scarisbrick	-	-	-	-	-
Scott	£191,000	£48,500	£101,000	-	£41,500
Skelm North	-	-	-	-	-
Skelm South	£65,557	£51,700	£13,856	-	-
Tanhouse	-	-	-	-	-
Tarleton	£42,000	£22,000	£20,000	-	-
Up Holland	£315,625	£210,047	£5,875	£99,703	-
Wrightington	-	-	-	-	-
Total	£2,713,142	£840,354	£1,131,584	£159,703	£41,500

Notes

1. Following negotiations between the developers and the Council, some payments are accepted in instalments to help protect the viability of the development
2. Potential monies are where the trigger for payment has not yet been met, or where monies are due but payment is pending.
3. Where monies are available, the Borough Council is working with Lancashire County Council to identify, refine and deliver suitable projects.
4. £41,500 of monies allocated to transport highway works in Scott Ward were returned to the developer due to the highway works no longer being required (after consultation with local residents)

AMR / IFS: Infrastructure Delivery Schedule

ID	Status	Project name	Project description	Location	Parish Area (if applicable)	Organisation name	Project partners	Infrastructure Category	Sub Category	Project started	Project completed
146	Not started	Improvements to railway station facilities	Improvements to railway station facilities	Aughton Town Green Station	Aughton	Network Rail				No	No
145	Not started	Improvements to railway station facilities	Improvements to railway station facilities	Aughton Park Station	Aughton	Network Rail				No	No
108	Not started	Surface water flooding study investigation	Surface water study investigation into flooding	Parrs Lane/Prescot Road and Town Green Lane, Aughton	Aughton	LCC	WLBC	Green		No	No
123	Not started	Flood prevention works, Bickerstaffe	Installation of flood prevention infrastructure in consultation with LCC flood management team	Two areas of Bickerstaffe Ward flooded in December 2015 a) Coach Road, Barrow Nook b) Royal Oak, in relation to flooded culverts of Knoll Brook	Bickerstaffe	LCC		Green	Water	No	No
117	Not started	Bickerstaffe Gateway to Green Spaces	Car parking facilities / improvements (including flood risk management) for access to open green space, park area, sports facilities, outdoor gym, football pitch, play area and off-road pedestrian cycle access to the cycle trails	Bickerstaffe QE2 field in trust, Hall lane, Bickerstaffe	Bickerstaffe	Bickerstaffe Parish Council	WLBC	Leisure		No	No
179	Not started	Burscough cycleway	New cycle route between Ringtail Retail Park and Burscough Industrial Estate	Burscough	Burscough	Lancashire County Council				No	No
150	Not started	Public Right of Way (8-18-FP139 & FP140)	Improve access along footpath and to canal moorings	PROW between New Lane to Harding Road, Bursough	Burscough	Lancashire County Council				No	No
143	Not started	Improvements to railway station facilities	Improvements to railway station facilities	Burscough Junction Station	Burscough	Network Rail				No	No
139	Not started	Improvements to railway station facilities	Improvements to railway station facilities	Burscough Bridge Station	Burscough	Network Rail				No	No

ID	Status	Project name	Project description	Location	Parish Area (if applicable)	Organisation name	Project partners	Infrastructure Category	Sub Category	Project started	Project completed
130	Not started	Martin Mere Filtration Reed Bed	Creation of a filtration reed bed. The work will require the removal of topsoil from approximately 74 acres of land, the landscaping of the site, installation of water control mechanisms, planting of reed and installation of platforms/interpretation.	Langley's Farm on the Southern Boundary of Martin Mere SSSI, SPA	Burscough	Martin Mere WWT				No	No
129	Not started	Burscough Bridge Station - Improvements to access	To provide a safe access to the railway station and to the Grove for public transport users and local residents, that enables people both with and without disability to access public services.	Burscough Bridge Station, Station Approach, Burscough	Burscough	Burscough Town Council	Lancashire County Council	Transport	Rail	No	No
120	Not started	Heathfields Connectivity and Canal Enhancement Plan	To improve access to the canal from Heathfields and to improve connectivity with shops, schools and local amenities, while enhancing the canal as a leisure facility by providing a pedestrian bridge over the canal	From canal bank at Clough Drive or Delph Avenue to Canal Towpath, Burscough	Burscough	Burscough Town Council	LCC	Social / Green	Canal	No	No
105	Not started	Burscough Library / Transport Interchange	Relocation of existing library into a larger more suitable premises. Dual project with ticketing and transport office	Station Approach, Burscough	Burscough	Network Rail / LCC		Transport		No	No
84	Not started	Investment in health facilities in Burscough	Upgrade and develop services in Burscough to address locality demand constraints and infrastructure issues	Burscough	Burscough	West Lancs CCG / NHS PropCo		Social	Health	No	No
81	Not started	New allotments in Burscough	Creation of new allotment facility	Site to be confirmed, Burscough	Burscough	WLBC		Green	Allotment	No	No
64	Not started	Burscough Town Centre Public Realm Improvements	Public realm improvements and shared space scheme on Liverpool Road between Mill Lane and Bobby Langton Way.	Burscough	Burscough	WLBC		Transport	Road	No	No
63	Not started	Yew Tree Farm to Burscough Town Centre access improvements	Provide widened footway to cater for cyclists on the west side of Liverpool Road between the new access junction (south of Higgins Lane) to Lord Street and to include pedestrian improvements at the Trevor Road signals.	Burscough	Burscough	LCC		Transport	Cycle	No	No
31	Not started	Community Woodland	New community woodland to be created in Burscough	Burscough	Burscough	WLBC		Green	Park	No	No
30	Not started	New Burscough Park	New Park proposal as part of Yew Tree Farm Development	Burscough	Burscough	Developers		Social / Green	Park	No	No
29	Not started	Burscough Sports Centre	The existing sports centre will be upgraded	Burscough	Burscough	WLBC		Social	Sport	No	No

ID	Status	Project name	Project description	Location	Parish Area (if applicable)	Organisation name	Project partners	Infrastructure Category	Sub Category	Project started	Project completed
27	Not started	Burscough drainage	In addition to usual on-site SuDS, surface water removal from existing system	Burscough	Burscough	LCC	WLBC	Utilities & Waste	Water	No	No
25	Not started	Electrification Ormskirk - Preston; First phase Burscough Junction	Electrification of the Liverpool - Ormskirk Line to Burscough Junction to open up the Liverpool travel to work area. Second phase to extend Burscough Junction to Preston.	Burscough	Burscough	LCC / Network Rail	WLBC	Transport	Rail	No	No
24	Not started	Reinstatement of Burscough Curves	Reinstatement of the Burscough Curves to Link Ormskirk - Southport - Preston.	Burscough	Burscough	LCC / Network Rail	WLBC	Transport	Rail	No	No
22	Not started	Burscough library	Provision of a new library of appropriate size in central location to support additional development	Burscough	Burscough	LCC		Social	Library	No	No
21	Not started	Increase secondary provision in the Burscough area	Increase secondary provision in the Burscough area	Burscough	Burscough	LCC	Developer(s)	ren, Young People & Scl	Education	No	No
20	Not started	Extension to Burscough primary school	Potential extension to increase a 1 form entry to a 2 form entry primary school.	Burscough	Burscough	LCC	Developer(s)	ren, Young People & Scl	Education	No	No
103	Not started	Refuge and footway improvement	Refuge and footway improvement on A5147 Wainshar Lane, Haskayne (35m north of Rosemary Lane)	A5147 Wainshar Lane, Haskayne	Downholland	Downholland Parish Council	LCC	Transport	Bus	No	No
70	In progress / Fun	Cheshire Lines Path	Improvements to access, signage, surfacing and interpretation.	Great Altcar/Downholland	Great Altcar	WLBC		Leisure	Cycle	Yes	No
153	Not started	Hesketh Bank Heritage Park	Creation of a Heritage Park/Gateway Facility for the Douglas Linear Park and Footpaths.	Former brickworks site, Hesketh Bank	Hesketh-with-Beccons	West Lancashire Heritage Park Trust	LCC, WLBC			No	No
127	Not started	Hilldale Jubilee Field Footpath	Reinstatement of the footpath	Hilldale Jubilee Field, Chorley Road, Hilldale, Parbold	Hilldale	Hilldale Parish	LCC	Leisure	Footpaths	No	No
180	Not started	New car park at the Maharishi School, Lathom	New car park at the Maharishi School, Lathom	Cobbs Brow Lane, Lathom	Lathom	Maharishi School				No	No
186	Not started	Neverstitch Road Cycle Path Upgrade, Skelmersdale	Numerous upgrades required along existing cycle path along Neverstitch Road from the western end (Turnberry underpass / connection with 8-2-FP-101), in order to conform to LTN 1/20 standards:	Neverstitch Road, Skelmersdale	Lathom South	Lancashire County Council	WLBC			No	No

ID	Status	Project name	Project description	Location	Parish Area (if applicable)	Organisation name	Project partners	Infrastructure Category	Sub Category	Project started	Project completed
185	Not started	Lathom South footpath network upgrades	3x footpath upgrades to accommodate pedal cycles (3m wide), new signange, new lighting, creation of new PROW between FP24 and FP101. Total length of paths = 1km.	Footpath Network Upgrade, Land East of Slate Lane, Lathom South (8-1-FP24, 8-2-FP95, 8-2-FP101)	Lathom South	Lancashire County Council	WLBC / Parish Council			No	No
122	Not started	Swells Wood	Development as a linear park route	Swells Wood, South Lathom	Lathom South	Lathom South Parish Council	WLBC / LCC	Green	Park	No	No
33	Not started	New Allotments in Newburgh	New Allotments in Newburgh	Site to be confirmed, Newburgh	Newburgh	WLBC		Green	Allotment	No	No
95	Not started	Hesketh Avenue / Aveling Drive sports pavilion	Construction of a new purpose built pavilion	Hesketh Avenue, Banks	North Meols	North Meols Parish Council	WLBC	Leisure	Sport	No	No
94	Not started	North Meols Community Centre renovations	Renovations for existing community centre	Hoole Lane, Banks	North Meols	North Meols Parish Council		Social		No	No
13	Not started	Banks Linear Park	New multi use linear park providing an off road path following former railway line	Banks	North Meols	WLBC		Transport / Green	Park	No	No
168	In progress / Fun	Appley Bridge – Parbold Towpath Enhancement	Towpath enhancements along the Leeds Liverpool Canal between Bridge 42 Appley Lane South, Appley Bridge and Bridge 37 Mill Lane Parbold - a distance of approx. 3.5 miles.	Appley Bridge – Parbold	Parbold	Canal and River Trust	WLBC			Yes	No
140	Not started	Improvements to railway station facilities	Improvements to railway station facilities	Parbold Station	Parbold	Network Rail				No	No
121	Not started	Car parking resurfacing, Canal side, Parbold	Resurfacing works on waste ground to formal car parking	Land adjacent to Station Road, Parbold	Parbold	Parbold Parish Council		Transport	Road	No	No
59	Not started	New changing facilities at Bramble Way, Parbold	New changing room facilities at Bramble Way, Parbold	Parbold	Parbold	WLBC		Social	Sport	No	No
34	Not started	New Allotments in Parbold	New Allotments in Parbold	Site to be confirmed, Parbold	Parbold	WLBC		Green	Allotment	No	No
155	Not started	Burscough-Rufford Canal towpath improvements	Surface improvements to canal towpath between Burscough and Rufford	Burscough-Rufford	Rufford	Canal and River Trust	Lancashire County Council			No	No

ID	Status	Project name	Project description	Location	Parish Area (if applicable)	Organisation name	Project partners	Infrastructure Category	Sub Category	Project started	Project completed
148	Not started	Public right of way (8-14-FP08 & FP09)	Improving the public footpath along part of Rufford Boundary Sluice	PROW between Cousins Lane to Sluice Lane, Rufford	Rufford	Lancashire County Council				No	No
144	Not started	Improvements to railway station facilities	Improvements to railway station facilities	Rufford Station	Rufford	Network Rail				No	No
138	Not started	Improvements to railway station facilities	Improvements to railway station facilities	New Lane Station	Scarisbrick	Network Rail				No	No
137	Not started	Improvements to railway station facilities	Improvements to railway station facilities	Bescar Lane Station	Scarisbrick	Network Rail				No	No
109	Not started	Installation of dedicated highway surface water drainage system	Installation of dedicated highway surface water drainage system - Tarleton Highway surface water infrastructure	Tarleton	Tarleton	LCC		Green		No	No
36	Not started	Green lane link road	Required to remove HGV traffic off rural road network in Tarleton.	Green Lane, Tarleton	Tarleton	LCC	WLBC	Transport	Road	No	No
167	Not started	Up Holland cycle route provision and improvements	Creation of an Up Holland cycle link	Mill Lane, Up Holland	Up Holland	Lancashire County Council	WLBC			No	No
165	Not started	Tower Hill Sports Hub	Two phased approach: First, to introduce an adult football club and secondly, to develop the concept of a sports club with other indoor and outdoor sporting activities, including tennis, bowling, indoor sports centre and rooms for leisure classes	Tower Hill Road, Up Holland	Up Holland	Orrell Sporting Club Ltd				No	No
159	Not started	Provision of off-road footpath on Tower Hill Road, Up Holland	Provision of a new footpath on Tower Hill Road, Up Holland	Tower Hill Road, Up Holland - land opposite entrance to Wellcross Farm.	Up Holland	Up Holland Parish Council	LCC; WLBC; Up Holland PC; Ibstock Bricks			No	No
158	Not started	Refurbishment of Wesleyan Chapel to provide community facilities	Refurbishment of Grade II Listed Chapel to provide community facilities	School Lane, Up Holland	Up Holland	Up Holland Parish Council				No	No
136	Not started	Improvements to railway station facilities	Improvements to railway station facilities	Up Holland Station	Up Holland	Network Rail				No	No
125	Not started	Up Holland library and community meeting room	Internal re-arrangement work to provide flexible space for community facilities	Up Holland Library, Hall Green, Up Holland	Up Holland	Up Holland Parish Council	LCC	Social	Library	No	No

ID	Status	Project name	Project description	Location	Parish Area (if applicable)	Organisation name	Project partners	Infrastructure Category	Sub Category	Project started	Project completed
89	Ongoing	(re) Cycle to Work Scheme	Scheme provided for Skelmersdale and Up Holland residents, working on Pimbo or White Moss employment areas, and earning under £25k per annum, to provide them with reconditioned cycles to access work/encourage sustainability	Pimbo & White Moss employment area	Up Holland	WLBC		Transport / Green	Cycle	Yes	No
141	Not started	Improvements to railway station facilities	Improvements to railway station facilities	Appley Bridge Station	Wrightington	Network Rail				No	No
99	Not started	Improved drainage at Mossy Lea playing fields	Improved drainage at Mossy Lea playing fields	Mossy Lea playing fields, Wrightington	Wrightington	WLBC	Wrightington Parish Council	Social	Sport	No	No
98	Not started	Improvements to play area/field at Appley Lane South	Improvements to play area/field at Appley Lane South	Appley Lane South, Appley Bridge	Wrightington	WLBC	Wrightington Parish Council	Social	Children	No	No
32	Not started	Appley Bridge Park and Ride	Park and Ride facilities and accessibility improvements at - Appley Bridge	Appley Bridge	Wrightington	Network Rail	WLBC	Transport	Rail	No	No
178	Not started	Yew Tree Road low traffic neighbourhood	To create a Low Traffic Neighbourhood (LTN) to the north of Ormskirk town centre	Yew Tree Road, Ormskirk	Ormskirk (non-p)	Lancashire County Council				No	No
175	In progress / Fun	Ormskirk cycle improvements	Improvements to signage and a new pedestrian/cycle crossing.	Ormskirk	Ormskirk (non-p)					Yes	No
172	In progress / Fun	Halsall Lane Park, Ormskirk	Extension of play area to include new swings and access	Ormskirk	Ormskirk (non-p)	WLBC Leisure				Yes	No
171	In progress / Fun	West End playing field, Ormskirk	Access and environmental improvements to West End playing field	Ormskirk	Ormskirk (non-p)	WLBC Leisure				Yes	No
151	In progress / Fun	Overhaul of UTMC system Ormskirk Town Centre	Assess and improve efficiency of signal co-ordination.	Signal junctions/crossings on Gyratory around Ormskirk Town Centre	Ormskirk (non-p)	Lancashire County Council				Yes	No
142	Not started	Improvements to railway station facilities	Improvements to railway station facilities	Ormskirk Station	Ormskirk (non-p)	Network Rail				No	No
135	Not started	A570 improvements in relation to Edge Hill related traffic congestion	Two small scale interventions to ease peak time congestion as traffic goes towards then away from Edge Hill	a) main entrance to Edge Hill University; b) Stanley Gate junction (St Helens-bound carriageway)	Ormskirk (non-p)	LCC	WLBC			No	No

ID	Status	Project name	Project description	Location	Parish Area (if applicable)	Organisation name	Project partners	Infrastructure Category	Sub Category	Project started	Project completed
134	Not started	Scott Estate Community Plan	Provision of increased parking area with seated section, tree planting	Sephton Drive, Scott Estate, Ormskirk	Ormskirk (non-p)	Scott Estate Community Plan	WLCVS			No	No
113	In progress / fund	Thompson Avenue play area improvements	Upgrade play area at Thompson Avenue public open space	Thompson Ave, Ormskirk	Ormskirk (non-p)	WLBC		Leisure	Children	Yes	No
111	Not started	Ormskirk allotments	Creation of new allotment site in Ormskirk	Site to be confirmed, Ormskirk	Ormskirk (non-p)	WLBC		Social / Green	Allotment	No	No
107	In progress	Hurlston Brook Flooding Study	Various improvements to infrastructure to alleviate flooding issues - recommendation of study on Hurlston Brook. In relation to Halsall Lane, Altys Lane, Railway Path, Cottage Lane. Various locations in Ormskirk.	Hurlston Brook, Ormskirk	Ormskirk (non-p)	LCC	WLBC	Green		No	No
104	Not started	Zebra crossing	Construction of a zebra crossing at junction of Aughton St / Bridge St, Ormskirk	Aughton Street, Ormskirk	Ormskirk (non-p)	LCC		Transport	Road	No	No
100	Not started	Puffin pedestrian crossing	Construct a staggered puffin pedestrian crossing on the A570 at the junction of Derby Street West / Southport Road / Church Street	A570 at the junction of Derby Street West / Southport Road / Church Street, Ormskirk	Ormskirk (non-p)	LCC		Transport	Road	No	No
42	In progress	Cycle link between Ormskirk bus station and Edge Hill University	Provision of new cycle link between Ormskirk bus station and Edge Hill University	Ormskirk	Ormskirk (non-p)	LCC	WLBC	Transport	Cycle	Yes	No
41	Not started	Park Pool	Replacement of, or improvements to, existing facility	Ormskirk & Aughton	Ormskirk (non-p)	WLBC		Social	Sport	No	No
40	Not started	Coronation Park improvements	Coronation Park - final phase of environmental and facility improvements (art, water features, stone wall repairs, flower beds)	Coronation Park, Ormskirk	Ormskirk (non-p)	WLBC		Social	Park	Yes	No
39	Not started	Ormskirk bus station	Ormskirk bus station upgrade	Ormskirk town centre, Ormskirk	Ormskirk (non-p)	LCC	WLBC	Transport	Bus	No	No
184	Not started	Installation of a 1 mile running track and trim trail	Installation of a 1 mile running track and trim trail	St James Catholic Primary School, Ashurst Road, Skelmersdale	Skelmersdale (non-p)	St James Catholic Primary School, Ashurst Road, Ashurst				No	No

ID	Status	Project name	Project description	Location	Parish Area (if applicable)	Organisation name	Project partners	Infrastructure Category	Sub Category	Project started	Project completed
183	Not started	Skelmersdale Active Community Hub	Creation of an active community hub at the Ecumenical centre, where people can access a range of leisure and fitness activities that enrich their lives, with particular focus on people who are older, with mobility issues, disengaged youth, refugees.	Skelmersdale town centre (Ecumenical centre)	Skelmersdale (non-p)	Skelmersdale Ecumenical Centre				No	No
174	In progress / Fun	Clough Valleys environmental improvements	Access improvements, woodland management, drainage works, routine cleansing and vegetation clearance to upgrade the environment and develop the recreational and ecological potential of the three cloughs.	Delph Clough, Elmers Clough & Westheads Clough, Skelmersdale	Skelmersdale (non-p)	WLBC Leisure				Yes	No
173	In progress / Fun	Long Heyes Play area	Extension of the play development project to allow it to provide play facilities for the under-6 age group, with associated parents seating facilities.	Ashurst, Skelmersdale	Skelmersdale (non-p)	WLBC Leisure				Yes	No
170	In progress / Fun	Helmsdale Replacement Play Area	Replacement play area	Helmsdale, Birch Green, Skelmersdale	Skelmersdale (non-p)	WLBC Leisure				Yes	No
166	Not started	Cycle route along the old Bickerstaffe-Skelmersdale rail link	New cycle route along the former railway line between Bickerstaffe and Skelmersdale, linking Jubilee Woods cycle trails with Skelmersdale via White Moss Road South.	Bickerstaffe / Skelmersdale	Skelmersdale (non-p)	Lancashire County Council	WLBC			Yes	No
157	In progress / Fun	Tawd Valley Park Play Area	High quality play facilities for all ages and abilities to complement the development of Skelmersdale Town Centre	Tawd Valley Park (adjacent to the town centre), Skelmersdale	Skelmersdale (non-p)	WLBC Leisure	Groundwork Trust; Friends of Tawd Valley Park			Yes	No
132	Not started	Extension of footpath/cyclepath to Elmers Green Lane	Extension of the footpath/cycleway to the south of Beacon Lane at the northern boundary of the Whalleys site to Elmers Green Lane. Extension of route would encourage new residents to walk or cycle.	Beacon Lane / Elmers Green Lane, Skelmersdale	Skelmersdale (non-p)	West Lancashire Borough Council	Lancashire County Council			No	No
131	Not started	Tanhouse bowling green	Construction of new bowling green	Tanhouse Community Centre, Ennerdale, Skelmersdale	Skelmersdale (non-p)	Tanhouse Community Enterprise	WLBC	Social / Green		No	No
126	Not started	Skelmersdale Memorial Garden	Creation of a memorial garden as an extension of the existing war memorial. This will include new pathways, planting, fencing and artworks with armed forces themes.	Witham Road/Sandy Lane, Skelmersdale	Skelmersdale (non-p)	WLBC Leisure	Skelmersdale Ex-Servicemans Club			No	No

ID	Status	Project name	Project description	Location	Parish Area (if applicable)	Organisation name	Project partners	Infrastructure Category	Sub Category	Project started	Project completed
119	Not started	Tanhouse Environmental Improvements	Replanting the landscape area on spine road to improve street scene	Tanhouse Community facilities, Ennerdale, Skelmersdale	Skelmersdale (non-p)	Tanhouse Community Enterprise	WLBC	Green		No	No
110	Not started	Cycle footpath linking to industrial estates in Skelmersdale (Nipe Lane to Pimbo Road)	Cycle footpaths linking to industrial estates	Nipe Lane to Pimbo Road, Skelmersdale	Skelmersdale (non-p)	LCC		Transport	Cycle	No	No
106	Not started	Skelmersdale subway improvements	Urban Art project with local young people to repaint 8 subways	Various subway locations, Skelmersdale	Skelmersdale (non-p)	WLBC		Transport	Footpaths	No	No
102	Not started	Off road cycle path at Whitehey Lane, Skelmersdale	Off road cycle path at roundabout linking to industrial estate and footway linking to bus stop	Whitehey Lane, Skelmersdale	Skelmersdale (non-p)	LCC		Transport	Cycle	No	No
101	Not started	Cycle footpath linking to industrial estates in Skelmersdale (Whiteledge South to Nipe Lane)	Cycle footpaths linking to industrial estates. 2 schemes possible. Scheme A - Whiteledge South footbridge to Nipe Lane	Whiteledge South to Nipe Lane, Skelmersdale	Skelmersdale (non-p)	LCC		Transport	Cycle	No	No
88	Not started	Improvements to Skelmersdale employment areas	Improvements to infrastructure within Skelmersdale employment areas including entrance signage, green spaces, public realm and car parks to improve attractiveness of areas for business purposes	Skelmersdale	Skelmersdale (non-p)	WLBC		Social / Green	Highways	No	No
83	Not started	Redevelopment of Birleywood Health Centre	Upgrade and extension to Birleywood health centre to address locality demand constraints and infrastructure issues	Birleywood , Skelmersdale	Skelmersdale (non-p)	West Lancs CCGG / NHS PropCo		Social	Health	No	No
58	In progress / Fun	Tawd Valley Improvements	Improvements to enhance the Tawd Valley, including improved access, recreation and landscaping improvements	Tawd Valley, Skelmersdale	Skelmersdale (non-p)	WLBC		Social	Park	Yes	No
51	Not started	Skelmersdale Sports Centre	New £12 million sports centre to replace the existng sports centre	Skelmersdale & Up Holland	Skelmersdale (non-p)	WLBC		Social	Sport	No	No
49	Not started	New Visitor Centre at Beacon Country Park	New Visitor Centre at Beacon Country Park	Skelmersdale & Up Holland	Skelmersdale (non-p)	WLBC		Social	Park	No	No
48	Not started	New changing facilities at Chequer Lane	New football changing facilities at Chequer Lane, Up Holland	Skelmersdale & Up Holland	Skelmersdale (non-p)	WLBC		Social	Sport	No	No

ID	Status	Project name	Project description	Location	Parish Area (if applicable)	Organisation name	Project partners	Infrastructure Category	Sub Category	Project started	Project completed
45	Not started	Skelmersdale rail connection	Provision of a rail connection, together with a rail/bus interchange and parkway facilities, to serve Skelmersdale, with services to both Manchester and Liverpool	Skelmersdale & Up Holland	Skelmersdale (non-p)	LCC / Network Rail	WLBC	Transport	Rail	No	No
44	Not started	Skelmersdale Movement Strategy	Package of measures to improve connectivity throughout Skelmersdale and open up public realm	Skelmersdale & Up Holland	Skelmersdale (non-p)	LCC	WLBC	Transport	Road	No	No



Report of: Corporate Director of Place and Community

Relevant Portfolio Holder: Councillor Ian Moran

Contact for further information: Aidan Manley
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SUBJECT: A REGENERATION PLAN FOR SKELMERSDALE TOWN CENTRE

Wards affected: Skelmersdale North and Birch Green Wards

1.0 PURPOSE OF THE REPORT

1.1 To seek approval to the funding arrangements for the preparation of a Regeneration Plan for Skelmersdale Town Centre.

2.0 RECOMMENDATIONS

2.1 To note that Lancashire County Council (LCC) has made a provisional award of £245,900 from its Lancashire Economic Recovery and Growth Fund (LERG Fund), to the Skelmersdale Regeneration Plan, subject to the Council making a 15% contribution to the project cost.

2.2 That the Council makes a 15% contribution to the cost of the Skelmersdale Regeneration Plan in the sum of £43,100.

2.3 That the Council accepts the award of £245,900 from LCC's LERG Fund, which represents 85% of the project's cost.

3.0 BACKGROUND

3.1 At its meeting in March 2021 Cabinet resolved:

A. That a Place-Shaping Hub made up of the partners (outlined in paragraph 3.5 of the report) be established.

B. That the Terms of Reference of the Place Shaping Hub be agreed as follows:
"To create and develop a Regeneration Plan for Skelmersdale Town Centre, that meets the aspirations and key priorities for the Council and its partners, initially concentrating on the area outlined at Appendix A and consider other specific, but connected, pieces or work around other key regeneration projects in the wider Skelmersdale and Up Holland area, including Estates Regeneration and Green Infrastructure proposals, including consideration of available funding."

- 3.2 A bid was made to LCC's LERG Fund to appoint Consultant's to undertake this project and a project brief was agreed by the Place Shaping Hub which was subsequently tendered via the Chest.
- 3.3 The tenders have now been evaluated and a preferred consultant identified.
- 3.4 Based on the bid submitted by the preferred consultant LCC have made a conditional award of £245,900 from its LERG Fund, subject to the Council making a 15% contribution to the project cost in the sum of £43,100.

4.0 HEALTH AND WELLBEING IMPLICATIONS

- 4.1 Health and wellbeing will be a central pillar of any development proposals in the Skelmersdale Neighbourhood, with walking and cycling particularly needing to be promoted through the Place Plan and a range of leisure uses enhanced. Any final development, which should bring new high standard development and improved transport links, should have significant health and wellbeing benefits for both the residents/users of the new development and existing residents within the town, as well as visitors and users of the town centre and Tawd Valley Park.

5.0 SUSTAINABILITY IMPLICATIONS

- 5.1 The delivery of a sustainable development in Skelmersdale Town Centre will bring various positive benefits for sustainability and the community, from redeveloping the vacant school sites (which are currently an eye-sore and a potential danger where anti-social or criminal behaviour takes place within them) to developing much needed housing and commercial / leisure development to create a more balanced town centre. It will also ensure that access across the Tawd Valley is fit for purpose and connects the rail station to the core of the town centre.
- 5.2 Any new development will also need to be balanced with the potential loss or replacement of some open space, and so the relationship with the Tawd Valley Park project and with Green Infrastructure and Playing Pitch Strategies for Skelmersdale will be crucial in off-setting the loss of open space in terms of quantity by improving the quality of open space and playing pitches on offer in the rest of Skelmersdale.
- 5.3 The development of a wider Community Plan and future pipeline projects will enable further economic, social and environmental benefits through the town.

6.0 FINANCIAL AND RESOURCE IMPLICATIONS

- 6.1 To Council will be required to make a contribution of £43,100 which represents 15% of the project cost. This will lever in £245,000 from LLC's LERG Fund.

6.2 As set out in the report to Cabinet in March 2021, the Place-shaping Hub and preparation of the Town Centre Regeneration Plan will involve input from various teams from across the Council and various partners to ensure a sustainable and deliverable Plan that respects all aspects of the neighbourhood and surrounding areas. Through the budget setting process there will need to be consideration of the staff resource required to manage the specific project going forward, as the current Skelmersdale Project Manager post is only temporary until March 2022. There will also be a need to resource the new Cabinet Working Group through Member Services.

7.0 RISK ASSESSMENT

7.1 The preparation of a Regeneration Plan for Skelmersdale Town Centre carries very little risk in and of itself. There may be risks in the implementation and delivery of those proposals in the future, should the Council have a role in that, and these will need to be carefully managed and appropriately communicated to ensure that public expectation is managed, however, that should not preclude from preparing a Plan to guide the development of this area for the benefit of Skelmersdale and West Lancashire in general.

Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

There is no direct impact on members of the public, employees, elected members and / or stakeholders in the preparation of a Place Plan or establishment of a Place-Shaping Hub. Therefore, an Equality Impact Assessment is not required.

Appendices

There are no appendices

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

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