

Question 4: Is there any data or evidence that we haven't referred to?

ID	Representor Comments	Council Response
14	non that I am aware of	Noted
17	<p>We have been instructed by The Skelmersdale Partnership who own the Concourse Centre to submit representations in respect of the emerging draft West Lancashire Local Plan Review Issues & Options Consultation. - - Our clients have owned the Concourse Centre since March 1997. It was constructed by the Commission for New Towns in the 1960s and is built over 3 floors with the main trading floor (two thirds of the retail space) on the first floor. We attach a site location plan and floor plans of the Centre. - - The Centre was originally designed for pedestrians and vehicles to be kept separate and therefore integration between car parking and the Centre is difficult. Access to the main trading floor is via a number of pedestrian bridges from the surrounding areas. In the 1980s the Centre was subdivided to include a 3 level multi storey car park which does not link directly into the trading floors of the Concourse at all levels. - - As a result, the distance between the car park and the shop floor is much larger than modern retail shopping centres. In order to traverse the centre it is necessary to travel between different levels by ramps, escalators, stairs or lifts. This makes trolley shopping particularly difficult. Not only does this negatively affect shoppers but it also results in a lower spend per trip as people tend to make smaller basket sales. As a result, the Concourse is particularly vulnerable to new shopping development either within the Town Centre or within its catchment area. - - The internal arrangement of the Centre is extremely tired. This is an inevitable consequence of the age of the Centre. Furthermore as can be seen from the submitted floor plans, a number of the large retailers occupy floorspace that is irregularly shaped, some of which is compromised by supporting pillars. This format is not ideal for some large space retailers who prefer a more regular layout which allows them to optimise and customise their store design. - - The Centre has struggled in recent years, there are currently a number of long term vacant units at the Centre. Including the second floor which is completely vacant other than some storage and represents about 10% of the overall floorspace. The Centre is currently 35% vacant. This level of vacant space is difficult but manageable. However, the current trading position of the Centre is fragile and it is vulnerable from other retail development in the town centre and elsewhere. For example, the owners remain extremely concerned about the impact of the St Modwen development on the Concourse Centre. They have held a number of meetings with the Council to express their concerns and would prefer to see the site developed for housing. - - For the reasons outlined above, the Concourse Centre is 'protected' in the Council's current Local Plan. In particular Policy SP2 of the Local Plan states that any new retail development in Skelmersdale Town Centre: - - "should not harm the vitality of the Concourse Centre and must provide sufficient linkage to the Concourse." - - The continuation of this policy protection is specifically supported. Furthermore, the retention and regeneration of the Concourse Centre is supported by a large number of residents and retailers. We attach a number of letters in support of the Concourse Centre. - - Turning to Skelmersdale Town Centre, the last retail study dated December 2011 concluded that the town had progressively lost ground in the national retail rankings with the pace of decline accelerating in recent years. A number of High Street retailers had all left the town e.g. Dunnes and had not been replaced. - - Other deficiencies include the fact that most comparison retail outlets in the town operate at the lower end of the retail spectrum; the very weak food and drink offer with no high quality restaurants, coffee shops or family eating places, only some public houses and no cinema or other leisure facilities. Furthermore, there is considerable leakage of comparison goods, expenditure leaking to destinations beyond the Skelmersdale town catchment area. - - In view of the above, the Town Centre is exceptionally weak for a town with a population of some 40,000 people and that it fails</p>	Noted

ID	Representor Comments	Council Response
	<p>to function effectively as a town centre. We do not believe that the St Modwen scheme will do anything to correct this decline. Whilst it may offer the opportunity to provide a modern retail development with free car parking, all that it will do is to further assist with the decline of the Concourse Centre by eventually attracting all of the tenants from the Concourse Centre to the St Modwen development. Accordingly we do not believe that there will be any net benefits to the Town Centre. - - Recommendation - - So we believe that the Local Plan review is correct in continuing to identify the regeneration of Skelmersdale town centre as an important objective. However, we believe that the Concourse Centre must continue to be protected as per the existing adopted Local Plan i.e. Policy SP2. The reason being that the Centre is now even more fragile than it was during the preparation of the adopted Local Plan and so it is important that specific measures are put in place to ensure that its regeneration takes place. In doing so we would specifically request that the St Modwen scheme is deleted from the Town Centre and that retail and leisure uses are not considered appropriate for the site rather it be identified for residential development. -</p>	
18	The Spatial Portrait recognises that the demographic profile of the Authority is ageing which we consider to be a matter of critical importance over the Development Plan period.	Noted
20	None at this time.	Noted
23	No	Noted
24	Not as far as I know	Noted
26	I think it would be good to refer to your playing pitch strategy and any other 'health' related strategies.	At the time of writing, the open space studies were in the process of being updated. The results of which will be included in the preparation of the Local Plan Review.
28	Data regarding Up Holland is inconsistent as sometimes Up Holland is included with Skelmersdale and sometimes it is separate. - Up Holland is clearly different in character to Skelmersdale and this is acknowledged and yet Up Holland is still included with Skelmersdale.	Noted. It is not always possible to find data for the individual areas, but where available and appropriate we will do our best to provide data separately for Up Holland and Skelmersdale.
30	The elected Mayors of Greater Manchester and Liverpool, will when they have adopted the Spatial Framework proposals currently under consideration and resolved issues of the relationships between the Boroughs Planning Functions and the Mayors overarching responsibility greatly influence West Lancashire's role as the green belt between the conurbations. CPRE Lancashire submitted extensive, well research rebuttal of the Greater Manchester proposed Spatial Framework and its attack on its green belt. This is available on the CPRE Lancashire website.	Noted
31	Not that I can think of	Noted
32	I can't think of anything	Noted
35	<p>The commitment by WLBC to provide an updated Spatial Portrait of the Borough and the settlements within it is supported, as this will ensure that the Local Plan and the policies contained within it are reflective of the current provisions and needs of the Borough and its population. - The assessment of Burscough undertaken and the summary of the spatial portrait of the settlement is generally supported. It clearly demonstrates that Burscough is a sustainable settlement with a wide range of shops and services, and is reasonably well-connected by public transport. Furthermore, Burscough serves a purpose for supporting nearby smaller settlements, further demonstrating the importance of the settlement. - The document also identifies the key issues facing Burscough, including the capacity of the sewerage system, concerns relating to surface water</p>	Noted

ID	Representor Comments	Council Response
	<p>drainage and flooding, congestion levels on the roads through Burscough and the upgrading of the railways and bus services. It is necessary for WLBC to appreciate that although a greater number of houses within the settlement could adversely impact upon these services if not mitigated effectively, if appropriate measures are put in place by the Council and by relevant developers, further development within and around Burscough may in fact relieve each of these pressures on infrastructure. This must be carefully considered by the Council through the Local Plan Review and therefore, how revisions to the Plan may in the longer-term address current and potential pressures within some settlements across the Borough. - - Paragraph 4.3 identifies that Yew Tree Farm was allocated within the current Local Plan for housing and employment uses, and further land was safeguarded for potential longer-term development. It is necessary for WLBC to acknowledge that this allocation has not delivered the level of development it was intended to within the first few years of the Plan period, and as such, the Local Plan Review should consider the earlier release of safeguarded land to meet the development needs of Burscough and the wider Borough. - The allocation of land at Yew Tree Farm included the release of land from the Green Belt to allow development to take place to meet the needs of the Borough. Following the release of land from the Green Belt and its identification as an area for development a masterplan was produced through an SPD, identifying the phasing of the development of Yew Tree Farm – this masterplan is therefore purely a material consideration in the determination of applications within the area. The policy consideration is that the land was released from the Green Belt, acknowledging that the Council consider the whole site suitable for development. - Therefore, as the land has already been released from the Green Belt as part of the current Local Plan, further consideration should be given to the deliverability of each of the parcels within the site and the contributions these could make, through allocations to the development needs of the Borough. Consideration and subsequent allocation of such sites could reduce the need to release further Green Belt land.</p>	
39	<p>Burscough reference to Martin Mere makes no mention of the challenge of recently permitted fracking under SSSI sites and Martin Mere and any negative impacts this may have on tourism and agriculture included in the related government reports and referred to in the ‘the all members parliamentary committee report’ on fracking. - There is also no mention of the significance of proposed fracking in Flood Zones 2 & 3 and near aquifers throughout the area (Burscough, Halsall, Banks etc.) which although considered ‘unsuitable’ in these zones except in “mitigating circumstances” by the Environment Agency they have not been withdrawn from current PEDL fracking licence areas. - Although the local plan has no jurisdiction over ‘fracking or mineral extraction’ the undoubted consequences of published proposals to road infrastructure, water quality, agricultural and tourism is to be considered in non political forward planning. - - Halsall Parish Council has been in correspondence with the Environment Agency and the Health and Safety Executive and we copy below some of our questions to them, which highlight our concerns, and which also includes a link to the USA research on the damage caused by fracking. - Halsall Parish Council wishes to submit that this evidence from the USA research needs full and careful consideration in formulating the Local Plan - Our correspondence - The Customers and Engagement Team, Cumbria and Lancashire Environment Agency,CMBLNC Info requests - email Inforequests.cmblnc@environment-agency.gov.uk - cc Tony Almond , Health and Safety Executive - email tony.almond@hse.gov.uk - - Thank you for your reply dated 25th October. - You state in your e mail that fracking takes place 2-3 km underground so it will have no effect on flood risk. -</p> <ul style="list-style-type: none"> • However fracking involves pouring millions of gallons of poisonous water into the ground to force the gas upwards and this practice is untested in the UK.Can we please again ask you to comment specifically and acknowledge your awareness of the catastrophic errors made in the US 	<p>Fracking licences are the responsibility of Lancashire County Council, not the Borough Council. Environmental concerns regarding fracking are therefore for the consideration of LCC.</p>

experience as shown in the following, and demonstrate precisely how the previous faulty technology has been made failsafe and tested? Please will you acknowledge that you have taken note of how recent the violations are and how much older is the protective legislation which has been demonstratively unequal to the task in the US. -

• <http://www.pnas.org/content/110/28/11250.full.pdf?sid=6e9e43dc-0210-4785-8c76-5819cfb92d20> - where the US research results stated on page 11251 that - Results and Discussion Dissolved methane was detected in the drinking water of 82% of the houses sampled (115 of 141). Methane concentrations in drinking water wells of homes <1 km from natural gas wells (59 of 141) were six times higher on average than concentrations for homes farther away ($P = 0.0006$, Kruskal–Wallis test) (Fig. 1 and Fig. S3). Of 12 houses where CH₄ concentrations were greater than 28 mg/L (the threshold for immediate remediation set by the US Department of the Interior), 11 houses were within 1-km distance of an active shale gas well (Fig. 1). The only exception was a home with a value of 32 mg CH₄/L at 1.4-km distance. - and on page 11254 stated that - The two simplest explanations for the higher dissolved gas concentrations that we observed in drinking water are (i) faulty or inadequate steel casings, which are designed to keep the gas and any water inside the well from leaking into the environment, and (ii) imperfections in the cement sealing of the annulus or gaps between casings and rock that keep fluids from moving up the outside of the well (4, 40–42). In 2010, the Pennsylvania Department of Environmental Protection (DEP) issued 90 violations for faulty casing and cementing on 64 Marcellus shale gas wells; 119 similar violations were issued in 2011..... - Casing leaks can arise from poor thread connections, corrosion, thermal stress cracking, and other causes (43). If the protective casing breaks or leaks, then stray gases could be the first sign of contamination, with less mobile salts and metals from formation waters or chemicals from fracturing fluids potentially coming later. In contrast, faulty cement can allow methane and other gases from intermediate layers to flow into, up, and out of the annulus into shallow drinking water layers..... - This result could mean that the number of drinking water problems may grow with time or that drilling practices are improving with time; more research is needed before firm conclusions can be drawn. - You state that any development in flood zones 2 and 3 require a Flood Risk Assessment to be submitted by the developers in support of any planning application. - • This request to a young inexperienced commercial undertaking, (ie the fracking company) for expert Assessments to be submitted to the established experts in the field, (ie yourselves), seems to be akin to the doctor asking the patient for medical advice. As you have decades of experience in the field of hydrology, it is surely contingent on yourselves to provide this information as the Body set up to manage these matters and to defend our Environment as your Title implies. Can we, the Parish Council, again please request your assessment of the risk to residents, animals and agricultural produce, based on your expertise, from pouring millions of gallons of contaminated water into the potable aquifer at Halsall Moss. Can you please demonstrate where you believe the poisoned water will flow out into the environment and its rate of flow and your scientifically tested reasons to discount the evidence of the upward flow shown in the US experience? - In the HSE Q&A document, it is stated that the HSE uses HSE experienced well inspectors to monitor the operators, and also that Independent Well Examiners also serve this function - • As fracking is in its infancy in the UK, can we, Halsall Parish Council, please ask for evidence of where the experienced HSE well inspectors have derived their experience? - • The experienced HSE well inspectors appear from the wording to be different from the Independent Well Examiners mentioned in the document. Similarly can we ask where they derive their experience? Also can you please provide the Parish Council with information as to where the Independent Well Examiners derive the funding for their salaries, with particular focus on the Independence of the funders? - Finally, as we perceive the majority of the benefits of fracking to flow outside the area, whilst all the risks fall on the

health and welfare of the unwilling local community, the vulnerable environment, and the economic livelihood of farmers, can we urge you to use your influence to press for the establishment of a Bond or similar deposit of adequately large funds, by the fracking companies, tied to the areas in question, and which can be held in reserve long term, to be released to cover the long term costs of repair to the land, water, health and households affected? Otherwise these costs will fall on the taxpayer and not those responsible. It will also be a spur to greater efficacy. - Halsall Parish Council has submitted further questions to the Environment Agency and the Health and Safety Executive concerning a Guardian article which revealed the huge waste disposal problems involving the contaminated water, the need to transport the waste water and to set up cleansing plants. Here is an extract - In the following article, reproduced in full below, published in the Guardian, <https://www.theguardian.com/environment/2016/jun/15/uk-fracking-firm-plans-dump-wastewater-in-sea-ineos> the hazards of wastewater are analysed. We have noted that 20% to 40% of chemically contaminated and radioactive water rises to the surface and that the Operators are required to cleanse the water of its poisonous, radioactive components prior to its release into the sea. - Shale companies pump water, chemicals and sand at high pressure underground to fracture shale rock and release the gas within, but each well can use as much as 6m gallons of water. Between 20 and 40% flows back to the surface, containing salts, chemicals and naturally occurring radioactive material which the Environment Agency (EA) says is likely to be classified as radioactive waste. - As we have noted above, Barton Aquifer is in flood zones 2 and 3 and is prone to flooding, as is the area in general. Also it is a potable resource and the water is used for human and animal consumption as well as for watering crops which again will be consumed. The Parish Council is extremely concerned that it will be impossible for the operators to contain the spread of this radioactive chemically poisoned water when the inevitable flooding takes place. Also as the water that rises up is slated for purification, and is per se unfit to be left in its current state, this admission of its poisonous state, begs the question as to its fitness to be allowed to take its natural underground course to its destination for drinking supply and also its outflow, naturally to the sea. We are extremely encouraged to read that you applied your powers to stop the irresponsible dumping of contaminated surface water, into the Manchester Ship Canal as shown in the following extract from the same article. - Two years ago, shale firm Cuadrilla withdrew an application for a permit to frack in Lancashire after the EA tightened up the rules over safe disposal. The change came after 2m gallons of wastewater had already been discharged into the Manchester ship canal. - We hope we can have confidence that you will not only adopt a similar approach with Barton Aquifer surface wastewater and contaminated floodwater, but also use your considerable expertise to address the concerns of natural underground flow of the poisonous 60%-80% into the drinking supply and eventually the Irish Sea. Please will you let the Parish Council know whether you will use your powers to stop the irresponsible proposal to frack at Barton Aquifer so we can put our minds at rest? - • We have also noted that there is a wastewater processing plant which is required, as mentioned in the following extract. - An environmental permit from the Environment Agency... will be required where we need to dispose of any process water according to an agreed waste management plan. We will employ licensed water treatment companies to process our wastewater." - A spokesman for UK Onshore Oil and Gas, which represents the shale industry, said: "In the exploration phase operators will send all flow back fluid to EA permitted treatment facilities for safe disposal ... When the industry moves to commercial production it will want to recycle flow back fluid and reuse it for the next stage of operation." - Please will you inform Halsall Parish Council :- a) Where the proposed plant would be sited? - b) If not sited locally, the numbers of lorry journeys per day which would be the norm for removal of the 20-40% wastewater which normally rises to the surface during the

ID	Representor Comments	Council Response
	<p>fracking process? - c) The number of lorry journeys which would be required to remove exceptional wastewater rising to the surface after the fracking process had stopped and which is a likelihood as it is sited in flood zones 2 and 3? (This again needs costing into the proposed Bond and/or be written into the contract with the Operators) - d) As was mentioned in our earlier point, infrastructure damage to roads is a likelihood of frequent heavy lorry use. Will this be costed into the proposed Bond, so the public purse does not suffer? - e) Where will the chemical and radioactive waste, after the water is removed, be disposed? - f) Are the disposal procedures the same as for radioactive waste in the nuclear industry? - • The Parish Council has noted the following opinion of water professionals as to the inability of current technical processes to meet regulatory standards for disposal of radionuclides. - In March, the Chartered Institution of Water and Environmental Management, which represents water professionals, said in a consultation response to the EA that “we are concerned about the ability to treat flowback fluid at the present time”. - It noted: “Advanced treatment technologies may not be able to treat the levels of dissolved solids in produced water which would limit the ability to treat produced water on site. Dilution at a treatment works may be able to reduce the salinity, however it may not be appropriate to dilute to the level required to dilute the radionuclides present to regulatory levels.” - As stated before, this is only considering the 20-40% initial flowback and does not address the question of the residual 60-80% during and after fracking, remaining underground in the drinking water supply and /or eventually flowing into the Irish Sea .Can you please reassure the Parish Council that you have noted the opinions of your fellow professionals, and that you as the responsible Authority will make a robust stand on this before we find ourselves glowing in the dark in a new kind of Green Deal? - • Finally, can the Halsall Parish Council be assured that our concerns are being redirected by yourselves, to the decision takers in your organisations, if you yourselves are not in this direct line of decision taking authority for our area? - a) Is there actually a procedure in existence, in your organisations to syphon local concerns to the decision makers? - b) If you are not in this decision making capacity and/or if there is no system for feedback reporting, can you please give the names and contact details of those who will be making decisions, so we can address them with our concerns? - Finally can I thank you for all your hard work and expertise in building a case for use in future planning applications..... - As a result of our correspondence, a meeting is currently being arranged between Halsall Parish Council and the Environment Agency to address the questions we have raised.(date of writing this is 21/4/2017) We believe that it is imperative and urgent that a Planning Department representative attends and that the above dangers are recognised and addressed as part of the Local Plan .As stated above, our opinion is that fracking is at cross purposes to the economic, social and environmental objectives of the Local Plan and a danger to the realisation of its worthwhile aims. - - Response C - Reference to the Western Parishes transportation does not include rural isolation between the western parishes and Ormskirk and generally poor condition of road surfaces on the ‘Moss Roads’ although this is a Lancashire County Council matter, it is a recordable fact that impacts spatial portrait.</p>	
42	<p>Yes, on soil health, agriculture, peat loss, water level management in the Alt-Crossens Catchment, and relating mainly to West Lancashire Borough. It's accessible via http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environmental-audit-committee/soil-health/written/26828.html and additional data and evidence through the local Environment Agency office.</p>	This data will be examined.
46	<p>The issue of education provision within Skelmersdale needs to be addressed as this appears to be distorted in terms of the number of parents choosing to send their children to schools outside of the town. Therefore</p>	The Council will continue to liaise with LCC Education with regard appropriate education provision.

ID	Representor Comments	Council Response
	data which identifies percentages of pupils at primary and secondary levels travelling out of the town to outlying schools would provide the opportunity to compare with other areas or towns in order to determine if there is an issue as this could have repercussions within the housing market.	
60	At the time of writing the Liverpool City Region SHELMA has not been published and therefore the impact on West Lancashire cannot be assessed at this stage. Paragraph 9.25 of the HEDNA states that it has not specifically assessed the need for affordable housing. Reference is also made in the HEDNA to the 2009 SHMA and therefore we question whether an update will be undertaken.	Comments noted
62	No comments are provided in respect of the Spatial Portrait Paper.	Noted
64	We await the publication of the Liverpool City Region SHELMA.	Noted
70	Whilst the Commissioners believe the general scope of the data and evidence outlined in the - Spatial Portrait Paper is sufficient for this stage of the plan making process, the issue is how - the data and evidence is interpreted which will be key in ensuring future policies in the Local - Plan Review are sound. Also, important will be ensuring that the evidence is up to date and - robust and future policies can be justified and are consistent with national policy. - - We note that there is a separate paper on Duty to Cooperate and believe the Spatial Portrait - could emphasise cross boundary issues more strongly. This is important especially give West - Lancashire's geographical proximity to larger urban areas and the Liverpool City Region.	Comments noted
72	no	Noted
77	Not Known	Noted
81	Agriculture and Food Production - Evidence of importance to West Lancashire Economy - - Agriculture and food production are particularly important to the West Lancashire economy. According to agricultural census data, there are 400 agricultural holdings in West Lancashire employing 2,300 people. The annual BRES data collected by ONS reports and additional 200 employees are employed in agriculture in 2015, in addition to those employed on farms. - - In terms of food processing, BRES data indicates that there are 2,250 jobs in food production in West Lancashire representing a third (32%) of the manufacturing jobs in the district and 4.7% of total jobs. - - Food production has been the source of much of the growth in manufacturing employment both in West Lancashire and also across GB. However West Lancashire has been much stronger growth accounting for 17.1% of manufacturing jobs since 2009, This has helped support overall growth of manufacturing employment in the borough, whereas GB has seen a fall in total manufacturing employment. - - Together, agriculture and food production account for 10% of jobs in West Lancashire compared to fewer than 3% nationally. Both of these sectors are, therefore vitally therefore a priority growth sector and important to the local economy and need to be included as a KEY ISSUE in the emerging Local Plan. - - Local Infrastructure - - Several road traffic assessments have been undertaken demonstrating the traffic and infrastructure constraints associated with the northern Parishes. This is also set out at Para. 2.36 of the Adopted West Lancashire Local Plan (2012-2027), in which "there are issues with traffic congestion in the two villages, particularly along the main Hesketh Lane/Station Road route. HGV's accessing agricultural and produce/packing facilities combine with local traffic, particularly at peak times, and can cause significant problems." - - In addition, the West Lancashire Highways and Transport Masterplan 2013 sets out the vision of constructing the Green Lane Link and route management strategy, as a direct solution to the infrastructure constraints associated with the Northern Parishes. - - This evidence base has not been included or referred to within the Spatial Portrait and needs to be included	Comments noted

ID	Representor Comments	Council Response
	as KEY ISSUES in the emerging Local Plan.	
85	In terms of any new definition of areas we would urge no change to Lathom being part of the Eastern Parishes in line with the agricultural community and close ties with Newburgh and Parbold. It has little link with what is an industrial area of Burscough. - -	Noted
87	Burscough Parish Council has good evidence of flooding which is not adequately covered in the evidence base. This is available to WLBC and the LLFA. - The hierarchy described, of three equal towns, is changed from the previous heirarchy and requires further discussion. - The over-riding issues for the local plan to address relate to adequate infrastructure to support development. Drainage is not adequate and roads are not adequate. Access to internet remains limited. - The spatial portrait therefore does not match our experience of it.	Comments noted. Flooding is benign explored through the Council's SFRA work and ongoing liaison.
95	2.1 The Spatial Portrait Topic Paper provides a character summary of each identified area of the Borough. We generally agree with the key issues that WLBC has identified both in respect of the borough in general and for specific areas of the borough. - - Ormskirk with Aughton - 2.2 The following facts are drawn from WLBC's Spatial Portrait as they are pertinent to our representations: - • Ormskirk is the second largest settlement in West Lancashire with a population of 18,000 people. Together with Aughton, the total population of the settlement increases to some 27,154 people, representing 24.53% of the overall population of the borough. By comparison, Skemersdale with Up Holland has a population of 42,698 (38.58%) while Burscough has a population of 11,231 (10.15%). - • Ormskirk represents the administrative hub of the Borough, with a large student population – associated with Edge Hill University – and several major employers including the University, Ormskirk Hospital and WLBC. - • It is accepted that Aughton effectively performs as a 'suburb' of Ormskirk. With the exception of two small local centres, Aughton tends to rely on Ormskirk for its facilities and services. - • Ormskirk with Aughton is highly sustainable; it is well served by rail with railway stations in Ormskirk, Aughton Park and Town Green and excellent access onto the main strategic highway network. - • While Ormskirk has a relatively balanced residential population, Aughton has one of the highest proportions of people over 65. - - These points provide context and an important back-drop to our representations.	Noted
96	AIUH notes that the subject site is statutorily listed and that the Seminary building has been identified as a Building at Risk. We would also note that in September 2016, the Victorian Society identified it as being one of the "top ten" buildings in terms of endangered historic buildings at risk and in urgent need of help and protection. - - We feel that this should be identified directly within the Spatial Portrait as it clarifies the planning importance of the heritage asset and reinforces the need to secure a positive way forward. - - Beyond this, AIUH makes no comment on this matter.	Comments noted
97	St. Modwen is somewhat surprised that no reference is made to the Council's Economic Development Strategy (2015) which is underpinned by evidence and makes a number of recommendations. St. Modwen makes no other comment on this matter.	Comments noted
99	We await the publication of the Liverpool City Region SHELMA.	Noted
102	A sound local plan should be based on an up-to-date evidence base which includes reference to the historic environment. The evidence base needs to identify: - - •What contribution the historic environment makes to the character of the area, to its economic well-being and to the quality of life of its communities; - •What issues and challenges is it facing and likely to be facing in the future; - •What opportunities the historic environment offers for helping to deliver the other objectives in the Plan area. - - When undertaking this exercise, it is important to bear in mind that it is not	Comments noted

ID	Representor Comments	Council Response
	<p>simply an exercise in listing known sites but, rather understanding their value to society (i.e. their significance). There is a need to identify the subtle qualities of the Borough and its local distinctiveness and character which can easily be lost. There will need to be an assessment of the likelihood of currently unidentified heritage assets including sites of historic and archaeological interest being discovered in the future. It may also be necessary to identify heritage assets outside the Council's area where there are likely to be setting impacts caused by any development proposals put forward in the area. It is also important to bear in mind that some asset types are not currently well recorded. For example, the Register of Parks and Gardens of Historic Interest in England, is thought to represent only around two thirds of sites potentially deserving inclusion. Evidence gathering can also help to identify parts of a locality that may be worthy of designation as a conservation area and identify assets that are worthy of inclusion in a local list. - - Potential sources of evidence include: - -</p> <ul style="list-style-type: none"> • National Heritage List for England - • Historic Environment Record - • Conservation Area Appraisals and Management Plans - • Local Lists - • National and Local Heritage At Risk Registers - • Historic Characterisation Assessments - • World Heritage Site Management Plans - • In house and local knowledge expertise - <p>- Where the evidence base is weak, the Council will need to commission additional work to ensure that the historic environment is adequately dealt with and can be used to inform the Plan. -</p>	
103	<p>Separate data sets for Skelmersdale, Bickerstaff and UpHolland. - Some data sets are segregated some are not. The fact that very different areas are amalgamated means that the summary statements do not reflect the position for Up Holland.</p>	<p>Noted. It is not always possible to find data for the individual areas, but where available and appropriate we will do our best to provide data separately for Up Holland, Bickerstaffe and Skelmersdale.</p>
107	<p>I have no further information</p>	<p>Noted</p>

Question 5: Does the Spatial Portrait match your experience of West Lancashire or the area you live, work or visit within West Lancashire? If not, what's different?

ID	Representor Comments	Council Response
14	yes	Noted
20	There is some disquiet within Aughton regarding the gradual erosion of Aughton's identity as a village in its own right. The linking of and reference to Ormskirk with Aughton seems to have taken place purely for administrative and political purposes without any consultation with the residents of Aughton.	Aughton is associated with Ormskirk for the purposes of the Local Plan to create a spatial area, just as Skelmersdale and Up Holland or any of the rural parish groupings are. The Council are aware of the different identities of each area, which are each explored through the spatial area papers.
23	No. Although Up Holland is linked to Skelmersdale by the boundaries designated in the document it is a separate entity geographically and culturally, and I feel it should not be considered as part of Skelmersdale's whole.	Up Holland is associated with Skelmersdale for the purposes of the Local Plan to create a spatial area, just as Ormskirk and Aughton or any of the rural parish groupings are. The Council are aware of the different identities of each area, which are each explored through the spatial area papers.
24	Yes	Noted
28	Up Holland is a separate entity to Skelmersdale and the people in Up holland do not naturally identify with Skelmersdale.	Up Holland is associated with Skelmersdale for the purposes of the Local Plan to create a spatial area, just as Ormskirk and Aughton or any of the rural parish groupings are. The Council are aware of the different identities of each area, which are each explored through the spatial area papers.
30	The Spatial Portrait does not reflect my experience of living in Skelmersdale. All references to Skem should be preceded by "some parts of". I think Fosters Green and Elmers Green and parts of old town are as affluent as Aughton and Parbold. The problem is that they are split and combined with less affleunt estates to form electoral wards	Concerns noted. It is not always possible to provide these lower level details.
31	Yes	Noted
32	Yes. I feel it relatively accurate.	Noted
39	No comment	Noted
40	The Spatial Portrait does reflect our experience and understanding of the issues, particularly with reference to the ageing population and the need for additional elderly accommodation. Furthermore, we agree that there is a need for significant economic growth which will in turn attract younger economically active households to the area which will make a valuable contribution to the competitiveness of West Lancashire within the wider region.	Noted
42	2.10 Ravenhead Brickworks is designated as a Site of Special Scientific Interest (SSSI) for its geology rather than for its wildlife. - - 5.5 We welcome the reference to "Mere Sands Wood Nature Reserve". The nature reserve and its visitor centre is owned and managed by The Wildlife Trust for Lancashire, Manchester & North Merseyside. In addition to its role in providing a green infrastructure amenity for residents and visitors, it is also a major node in the district's and county's ecological networks - a role recognised by its identification as a county-level Local Wildlife Site ("Lancashire Biological Heritage Site" (BHS)). It is also a nationally-designated geological SSSI. - - 6.7. If our understanding of the Eastern Parishes boundary be correct, then the last sentence in this paragraph is in error. The privately-owned Wrightington Bar Pasture SSSI lies at an altitude	Comments noted and corrections will be reflected in the Preferred Options.

ID	Representor Comments	Council Response
	<p>of around 90 m OD on the West Lancashire Borough side of the valley of Syd Brook, which flows between the villages of Wrightington Bar and Eccleston - the latter in Chorley Borough. It is important as one of the few remaining species-rich unimproved grasslands in Lancashire and represents the largest flushed example of this community type in the county. This vulnerable habitat is now rare both nationally and in Lancashire and West Lancashire Borough due, primarily, to many decades of agricultural intensification. For many years the site has been assessed by Natural England and its predecessor bodies as in unfavourable condition due to lack of appropriate grazing management. This has led to the progressive encroachment of scrub onto diminishing areas of species-rich grassland, with the remaining grassland of the site becoming increasingly rank. This is arguably the single most important site-related nature conservation issue within West Lancashire Borough; albeit one the resolution of which does not lie within the immediate remit of the West Lancashire Local Plan. - - 7.4 We welcome the reference to our Haskayne Cutting and to our Mere Sands Wood nature reserves. - - 8.34 We note the passing reference to green infrastructure (and one to biodiversity) under the heading "Transport & Infrastructure". We feel that rather more should be made of the role of green as well as grey infrastructure in providing services to those who live, work & learn in the Borough, and to visitors. - - 8.38 reads; - - "The Borough has the highest total area of wildlife trust reserves in - the country, with Martin Mere and the Ribble Estuary being the - larger two assets. These are recognised as internationally important - wetland habitats, particularly important as a winter feeding ground - for wetland birds." - - What is the source for the statement that, "The Borough has the highest total area of wildlife trust reserves in the country"? Regardless of whether the country in question is England or the UK, we would be surprised if that be the case - and we would make more of it! We currently own and manage two nature reserves in West Lancashire Borough; Haskayne Cutting and Mere Sands Wood. Martin Mere is owned and managed by the Wildfowl & Wetlands Trust. A substantial area of the Ribble Estuary within the borough is managed by Natural England as part of its statutory Ribble Marshes National Nature Reserve, and a smaller part by the Royal Society for the Protection of Birds (RSPB) as the latter's Hesketh Outmarsh nature reserve. Your authority also manages some statutory Local Nature Reserves. - - We suspect that, compared with the other Lancashire districts, West Lancashire Borough probably has the largest area of land (public and private - mostly the latter) within Lancashire County that is identified as Local Wildlife Sites ("Biological Heritage Sites"), but would need to confirm that with the Lancashire Environmental Record Network (LERN), the local biological record centre for Lancashire.</p>	
46	The Spatial Portrait reflects the Borough accurately and also highlights the key issues for each area.	Noted
50	<p>This section of the review focusses on the Strategic Development Options paper, which discusses - the level of development intended for the Borough, including potential housing numbers and the - area for employment land, the Local Plan period, the location of development, and the distribution - of development. - The paper presents a number of 'Strategic Development Options' covering the amount, and broad - location of, new housing and employment development. The paper sets out the positives and - negatives for each option, and consults on a preferred approach. - It is noted that paragraph 1.1.7 identifies that the Council is not currently earmarking any - specific sites for potential development at this stage of the Local Plan process. - The Topic Paper is sub-divided into a number of sections with specific questions at the end to - respond to. These sections are headed as: - <input type="checkbox"/> Spatial Portrait; - <input type="checkbox"/> Spatial Vision; - <input type="checkbox"/> Strategic Objectives; - <input type="checkbox"/> Strategic Development Options; - <input type="checkbox"/> Plan Period; - <input type="checkbox"/> Distribution of Allocations; - <input type="checkbox"/> Where Should New Development be Located; and - <input type="checkbox"/> What are the Infrastructure and Transport Constraints. -</p>	Noted

ID	Representor Comments	Council Response
	<p>Some of these topics are less likely to have any significant impacts on the SRN, such as the exact - wording of the Spatial Portrait or Vision. Notwithstanding this, there are a number of topics which - could have a direct impact on the operation and safety of the SRN, and therefore the reminder of - 4 - this section will focus on the following elements, which are most likely to be of interest to Highways - England: - [x] Strategic Development Options; - [x] The Location of New Development; - [x] Site Allocations; and - [x] Providing Infrastructure and Services - Strategic Development Options - This section of the Topic Paper sets out three variables for potential options concerning housing - and employment land in the Borough, covering: - [x] The amount of development land required for housing and employment uses per year; - [x] How far into the future the Local Plan is to look (the Local Plan period); and - [x] The way the total amount of development land required throughout the Local Plan period is - spread across the Borough.</p>	
57	<p>The Spatial Portrait seems to suggest that West Lancashire has no connection with the adjacent local authority areas and communities. Apart from one mention of the Port of Liverpool, there is no reference to any linkages with 'the outside world' - this could be interpreted as insularity and isolation.</p>	Comments noted
60	<p>Our clients see West Lancashire as an area that they wish to continue to invest in and to assist in meeting the existing and future needs of its residents.</p>	Comments noted
61	<p>I'm not sure if this belongs within Spatial Portrait but there is poor infrastructure within the Northern parishes. This relates to roads, low water pressure and often reduced bus services & health services.</p>	Comments noted
64	<p>Our Clients consider that this is an opportunity for the Council to be ambitious and to bring forward an aspirational and ambitious plan which will help to change the perspective and role of Skelmersdale as a Regional Town.</p>	Noted
67	<p>To large extent. - - What much of the evidence shows is that development and growth in West Lancashire has been highly constrained in the past with negative economic and social impacts resulting. There is a danger that all of the Borough's urban areas, towns and villages will stagnate without appropriate levels of development to support both economic growth and to sustain local services and facilities through household expenditure.</p>	Comments noted
70	<p>The Spatial Portrait summary provided in the paper highlights a number of key issues such as - an ageing population, declining working age population, need to boost employment rates - within the Borough and ability to maximise employment opportunities off the back of schemes - such as Liverpool2. - - The evidence base that has already been prepared to support the plan making process; namely - the Housing and Economic Development Needs Assessment ("HEDNA") and the Liverpool City - Region Strategic Housing and Employment Land Market Assessment ("SHELMA") confirms this - view. As outlined above however, it is how this data is interpreted and translated to an - appropriate policy response which will be key to ensure any future Local Plan policy which - seeks to address these issues is ultimately sound. This is discussed further in our comments - below. - - Spatial Portrait Paper: - The Spatial Portrait Paper ties together social, economic and environmental data to ascertain - the current issues in different areas of the Borough. This is broken down into the spatial areas - identified in the Strategic Policy Options Paper. We comment on the issues in relation to the - relevant spatial areas according to the Commissioners' landholdings as well the general key - issues for West Lancashire. - - The Western Parishes - This area contains the Commissioners' landholdings and is characterised as rural, with areas - of agricultural land and peat deposits. The paper also highlights affordability issues within the - area and that the Western Parishes contain an ageing population with the retired sector set -</p>	Comments noted

ID	Representor Comments	Council Response
	<p>to grow and become a greater proportion of the population over the plan period. - - These issues point to the area needing to be positively planned so that the population could - be potentially be rebalanced (addressing the issue of an ageing population) and that - settlements in the area can be maintained as viable and sustainable villages which are able to - offer local services and facilities for residents. - - This indicates a need to accommodate additional residential development in this area and - given its location, the settlements in the area also have the potential to link and support - growth in towns such as Ormskirk and settlements in neighbouring Sefton. - - We note the constraints outlined in this section, however issues of peat deposits and flood - risk can be assessed on a site by site basis and the presence of peat or areas of flood risk do - not necessarily preclude sites as technical solutions can be found to address these constraints. - - It is clear that to support future development in this area that the Green Belt boundary would - need to be assessed. We note in the SHELAA that this issue has been 'parked' for the time - being. Whilst there is a Green Belt Study, this was undertaken in 2011 and appears to be a - selective/partial review of the Green Belt (which does not include all of the Commissioners' - land). We also object to the way in which the Commissioners' land which is included has been - assessed. As such we believe this study needs to be revised and updated. - - Key Issues for West Lancashire - This section of the paper repeats the main issues highlighted at the beginning of the Strategic - Policy Options paper and amongst other things highlights: - • An ageing population; - A declining working age population; - • The need to boost employment rates within the Borough; - • Ability to maximise employment opportunities; and - • Issues of rural isolation. - - We have already discussed these issues within Section 2 and believe that in order to tackle - these, the Council will need to plan positively for development in West Lancashire and ensure - future policies are sufficient flexible so as to promote growth throughout the plan period.</p>	
72	yes	Noted
76	<p>The Spatial Portrait does reflect our experience and understanding of the issues namely that the population is ageing and that there is a need to sustain the existing economic growth as well as planning for significant economic growth to increase the competitiveness of West Lancashire within the wider region. In order to retain and attract younger economically active households, who are the future work force, issues of housing affordability need to be addressed.</p>	Noted
77	Matches as learned at workshop	Noted
78	Attended workshops, information matches	Noted
81	<p>There is a lack of emphasis placed on the critical importance that the agricultural and food production sector, which together accounts for 10% of jobs in West Lancashire compared to fewer than 3% nationally. Both of these sectors are, therefore vitally therefore a priority growth sector and important to the local economy - - Agriculture and food production are particularly important to the West Lancashire economy. According to agricultural census data, there are 400 agricultural holdings in West Lancashire employing 2,300 people. The annual BRES data collected by ONS reports and additional 200 employees are employed in agriculture in 2015, in addition to those employed on farms. - - In terms of food processing, BRES data indicates that there are 2,250 jobs in food production in West Lancashire representing a third (32%) of the manufacturing jobs in the district and 4.7% of total jobs. - - Food production has been the source of much of the growth in manufacturing employment both in West Lancashire and also across GB. However West Lancashire has been much stronger growth accounting for 17.1% of manufacturing jobs since 2009, This has helped support overall growth of manufacturing employment in the borough, whereas GB has seen a fall in total manufacturing employment. - - In addition, as a result of the Green Belt policy, which is highly restrictive, there are very limited opportunities for employment</p>	Comments noted

ID	Representor Comments	Council Response
	creation within the Northern Parishes, which is vital to maintain the sustainability of West Lancashire Borough, as a whole.	
96	With reference to Section 2 which concerns Skelmersdale with Up Holland, the Spatial Portrait is primarily - focused upon matters pertaining to Skelmersdale. The failure of the Spatial Portrait to provide more detailed - reference to the Up Holland area, or more particularly this complex of buildings is regrettable. - We would note that the Up Holland area has excellent access to the national road network so is also well suited in those respects to contribute to housing and employment needs. The Up Holland area also has a substantial number of prominent listed buildings, a number of which are no longer in active use.	Comments noted
97	With reference to Skelmersdale, the Spatial Portrait alludes to the need for regeneration of the town centre but it does not adequately express the urgent requirement to deliver a credible evening economy and other improvements to the town centre environment.	Comments noted
99	Our Clients consider that this is an opportunity for the Council to be ambitious and to bring forward an aspirational and ambitious plan which will help to change the perspective and role of Skelmersdale as a Regional Town.	Noted
102	The Local Plan should include a proper description and assessment of the historic environment in the Borough and the contribution it makes to the area (NPPF, Paragraph 169). The Plan needs to describe the historical growth of the area and identify its historic environment. It should also clearly identify the different places their character and identity and the contribution it makes to all aspects of life in the district of West Lancashire. Therefore, this paper should be amended accordingly.	Comments noted
103	The inclusion of Up Holland and Bickerstaff with Skelmersdale as a single coherent area does not facilitate easy analysis of data and often statements are made that do not apply to the less densely populated and more affluent areas of Bickerstaff and Up Holland. - The issues raised for Skelmersdale and the SE parishes do not reflect the issues for Up Holland because the data is generalised.	Noted. It is not always possible to find data for the individual areas, but where available and appropriate we will do our best to provide data separately for Up Holland, Bickerstaffe and Skelmersdale.
107	The constant reference to Aughton with Ormskirk is a cause of continuing concern to Aughton residents who view this as an erosion of the independent identity of Aughton as a vibrant semi-rural village. - This is being engineered for political and administrative reasons without any consultation with the Aughton community. - This also conflicts with some of the later objectives referring to the development of vibrant local villages.	Aughton is associated with Ormskirk for the purposes of the Local Plan to create a spatial area, just as Skelmersdale and Up Holland or any of the rural parish groupings are. The Council are aware of the different identities of each area, which are each explored through the spatial area papers.
109	Yes	Noted
110	My experience does match SOME of the councils spatial portrait but the problem the Council see's of an ageing population, particularly in Aughton and Ormskirk is jaded because the councils own policies are leading this problem by not attracting younger families to the area. The policy of trying to encourage building in Skelmersdale by not implicating a CIL levy is flawed in this respect. This is because it places extra pressure on developers in areas like Ormskirk and Aughton to deliver only high end expensive saleable houses so restricting the influx of young families to the area which is stifling and stagnating Ormskirk and Aughton by burdening it with mainly retired folk. This is also killing the shops in Ormskirk as the steam of new customers is being lost to surrounding towns.	Comments noted

Question 6: Have we identified the correct key issues? Are there any others we've missed out? What about the issues related to each area - do they correspond with your understanding of those areas?

ID	Representor Comments	Council Response
14	I think so	Noted
17	We agree that Skelmersdale Town Centre needs to be protected but it is important to ensure that new development is not approved which would result in a decline of the remainder of the Town Centre.	The Council are aware of the importance of protecting the viability of the entire Skelmersdale town centre
18	Yes, the first bullet point acknowledges that the demographic profile of the Authority is ageing. The provision of adequate support and accommodation for the increasingly ageing demographic profile of the City region is a significant challenge and, unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population, which will have a knock on effect in meeting the housing needs of the whole area and wider policy objectives. Specialist accommodation for the elderly, such as that provided by McCarthy and Stone, will therefore have a vital role in meeting the areas housing needs. - -	More detailed issues relating to the ageing population are detailed in our report 'An ageing population in West Lancashire' which is available from the Local Plan Review Evidence Base webpages at www.westlancs.gov.uk/localplan .
20	It is unrealistic to be asked to comment on areas with which we have little knowledge of or appreciation of their issues. As far as Ormskirk with Aughton.....there appears to be sufficient land available on Edgehill campus for further residential student accommodation without further usage of housing stock in the area. The Council are obviously losing a substantial Council tax income from HMO's and business rates through the conversion of commercial properties into further HMOs.	The purposes of the Issues consultation is to identify an issues that we have not yet done so. Consultation was Borough-wide so anyone could comment on any area of the Borough.
24	We have to support people with regard to keeping a pleasant and environmental friendly place to live in	Noted
26	yes	Noted
30	1. You have failed to consider the possibility of creating new Garden/Green Villages currently being promoted by the DCLG. There are 3 currently proposed for elsewhere in the North West. Such villages, if needed, properly masterplanned with adequate infrastructure are better than random, chance ad hoc additions to existing rural settlements. - 2.The completion of Skelmersdale Town Centre is a key issue. It should be linked with the creation of an attractive, accessible Tawd Valley Park, potentially a major asset but currently a run down "hidden gem". CPRE objections to the design currently approved for the misleadingly named "High Street" should be reconsidered and the design modified to take advantage of views of the park and facilitate access to the park by provision of dedicated parking. The site to the South of Ingram, should be included and the character of the proposed development recognised as "out of town warehouse" in style. The current unfinished, disjointed spaces combined need good design, speedily implemented. Possibly in stages so that people are attracted to use the park while some development plots remain undeveloped within a well designed foot path and road system. The present situation does not make Skelmersdale either an attractive shopping or residential destination. A successful town centre would impact on many of the other option and other policies	Noted. The Council are working with partners to deliver improvements to Skelmersdale Town Centre and the Tawd Valley.
31	Yes	Noted
32	Yes. Overall it reflects my understanding of the borough.	Noted
34	1.1.2 Three dimensions to Sustainable Development - Paragraph 1.1.2 discusses the three dimensions to sustainable development and how the NPPF requires the planning system to perform a number of roles. - The Local plan is split into different papers including Economy, Environmental and Social papers. To ensure Sustainable development these need to be	Comments regarding natural capital are noted, although it is not always the easiest thing to assess and further guidance would be welcome. We will seek to accommodate water resources into the Local Plan Review.

ID	Representor Comments	Council Response
	<p>interlinked, which the papers do appear to do in some areas. E.g. the impact of Flood risk is raised within the Social Paper. Moving forward to the next stage of the local plan we would recommend that this relationship is strengthened for guiding future development. One area that this could be done is through the recognition of the environment as an important asset. Natural capital is a way to value the environment economically by recognising that the environment can have a monetary value and can help attract investment. This helps to create a high quality environment through protecting and enhancing assets such as waterways within West Lancashire alongside supporting economic growth (e.g. linking to the value of visitor economy) whilst ensuring that we have healthy places to live for residential/recreational purposes through high quality green spaces. Natural Capital is therefore a key way to link these 3 papers whilst contributing to the Local Plan objectives. - - Section 1.4 Issues affecting West Lancashire In relation to the issues identified within section 1.4 there is a lack of recognition for the borough's waterways. We note that climate change is identified which incorporates flooding and drainage however, the current state of waterways with West Lancashire is not included within the issues listed. The 'thematic spatial evidence papers' 8.0 Water quality and resources outlines the current state of the watercourses however, this has not fed through to the Local Plan document. Waterways can support a range of habitat, their management influences flood risk and can provide attractive recreational spaces/investment areas. The current state of these watercourses in terms of water quality is therefore highly important to West Lancashire and the improvement/enhancement under the Water Framework Directive could assist in meeting the Local Plan's objectives. We would therefore recommend that the current state of waterways is highlighted to ensure future development does not cause pollution and where possible these are enhanced.</p>	
39	<p>Response A - No mention of impact on fracking (most of West Lancashire is in PED L fracking licence area 164 & 165) and what measures taken to mitigate effects including clean up, roads, particularly Moss Roads, Water Quality, noise and generally pollution and impact on agriculture and tourism and any regard to the existing or proposed Environmental Policy and subsequent impact. - - Response B - No mention of poor infrastructure Moss Roads, no bus services to isolated settlements such as Shirdley Hill and measures to combat rural isolation. - - Response C - Although there is a duty of co-operation with neighbouring authorities there may be cross boundary issues where large numbers of houses on boundaries of larger combinations of neighbouring authorities are not catered for in terms of schooling and medical services. -</p>	<p>Fracking licences are the responsibility of Lancashire County Council, not the Borough Council. Environmental concerns regarding fracking are therefore for the consideration of LCC.</p>
42	<p>The section on the 'Key Issues' for West Lancashire Borough addresses only international biodiversity issues; and as follows: - - "Parts of West Lancashire are internationally important designated nature reserves, accommodating significant proportions of the world population of certain species. - These are both an asset to the Borough, requiring continued protection, and also a potential constraint to development in some areas." - - There is surely a need and opportunity to look spatially at ecology in strategic / wider landscape terms across the whole of the borough and into adjoining authorities; and to better integrate maintenance, restoration and recovery of functional ecological networks through the planning system with other land uses and developments; and with delivery of green infrastructure for (human) residents, employees, students and tourists. And to consider international, national and county contexts.</p>	<p>Comments noted.</p>
43	<p>8.33 suggests that there are sufficient school places. This statement was made against the previous Local Plan sites and a review will be needed once these sites have been determined. - Skelmersdale Development – It has been communicated to LCC School Planning that the former Glenburn High School site is being considered for some additional housing. It should</p>	<p>Comments noted. WLBC will continue to liaise with LCC, as education provider, with regard future development proposals to ensure that education provision can be appropriately planned for.</p>

ID	Representor Comments	Council Response
	<p>be noted that such an increase in the area would require LCC to reconsider the position statement submitted in August 2016. The document focuses on Skelmersdale and options to increase housing and employment opportunities than previously stated in the Local Plan. If Skelmersdale and its surrounding areas are to be developed in such a way, LCC recommend a strategic approach to the area is taken for developments collectively and not in isolation. We would welcome the opportunity to discuss this further through the consultation process and face to face meetings with WLBC planning officers.</p>	
46	<p>Greater consideration should be given towards the commuter type of travel mainly by car from the main settlements. This being the only current realistic method of travel means that large scale development which is furthest from the motorway and arterial road network should be avoided as to do so would relatively quickly compound the existing problems during peak travel times.</p>	<p>Comments on commuter travel patterns noted.</p>
47	<p>I live on Ashurst. Parbold Rail Station is nearby and can be reached by the hourly 3A bus service. There are two trains per hour from Parbold to Manchester and the same to Southport. However, the likes of Tanhouse and Digmaor and even the town centre is further away from Parbold, so I can understand why people in those areas might be keener on Skem getting its own train station. One thing I would say is that getting to Liverpool has always been harder than it should be. The 311 bus service takes forever, and that service no longer goes through Ashurst. So you are looking at a bus to the Concourse, then a bus to Liverpool. Or a bus to the Concourse, another bus to Ormskirk and then the train to Liverpool. In practice, you are looking at 2 1/2 hours travel time on a good day, and that easily rise to 3 1/2 hours when services are disrupted. Also, Upholland train station is not at all accessible for the disabled and not served by public transport.</p>	<p>Noted</p>
48	<p>The key issues need to support the population so that we reduce our impact on the environment locally, regionally, nationally and internationally so that we can live sustainably.</p>	<p>Noted</p>
56	<p>Whilst Taylor Wimpey’s main interest lies in the provision of housing to provide for the needs of the borough, it acknowledges that this is inherently linked to the provision of employment opportunities. The National Planning Practice Guidance [Practice Guidance] requires that potential job growth is considered in the context of potential unsustainable commuting patterns and as such plan-makers should consider how the location of new housing could help address this. Ensuring a sufficient supply of homes within easy access of employment sources represents a central facet of any efficiently functioning economy and can help to minimise housing pressures and unsustainable levels of commuting (and therefore congestion and carbon emissions). - Taylor Wimpey therefore welcomes the acknowledgment in the SDO Paper that providing the right supporting context for attracting business (including appropriate housing provision to accommodate employees) is needed along with providing employment land in the right location [§4.4.1 – 7th bullet]. The new Local Plan should identify sufficient housing sites in close proximity to existing and proposed employment areas. - Taylor Wimpey particularly welcomes the Council’s approach to the Duty to Co-operate [§1.1.11] set out in the Duty to Co-operate Statement [DtC Statement] and in particular welcomes that WLBC has signed the Liverpool City Region [LCR] Statement of Co-operation. More detailed comments are made below in the ‘Duty to Co-Operate’ section of these representations but it is particularly important to ensure that housing and employment needs are met in appropriate locations. This does not just include the needs of West Lancashire alone but also any unmet need from neighbouring authorities. In this regard, it is welcomed that the SDO Paper recognises that “the key sub-regional matter for the Local Plan will be the Duty to Co-operate” and that the Framework requires that “cross-boundary issues are suitably addressed and collective</p>	<p>Noted</p>

ID	Representor Comments	Council Response
	<p>development needs are met in full” [§1.3.5]. - Taylor Wimpey notes the recognition that the Local Plan period should be at least 15 years [§1.2.3] and welcomes that the Council is considering a longer period (possibly to 2050). More detail on this point is provided below in the ‘Local Plan Period’ section of these representations. - Taylor Wimpey agrees that the affordability of housing and particularly that the median house price is almost 7 times median earnings [§4.4.1 – 3rd bullet] is a critical issue that needs to be addressed by the Local Plan. Further comments are made in relation to this below in the “Amount of Development Land Required” section of these representations.</p>	
57	<p>Although referred to in passing, the significant disparity between Skelmersdale and the remainder of the borough, particularly in economic and social terms, needs to be stressed and addressed more effectively. - Furthermore, the constraints imposed on the development of West Lancashire, particularly such policy constraints as Green Belt policy, are barely mentioned.</p>	Comments noted
60	<p>see answer to Question 4 above.</p>	Comments noted
61	<p>I agree development opportunities should be maximised along the M58 Corridor, in particular around Skelmersdale. The road infrastructure is good, far better than the rest of West Lancashire, with easy access to motorways, including the M6. - It also has a modern college to help provide the skills that will be needed. - Priority should be placed on providing rail links to Skelmersdale and also improving the town centre. - This will also help to reduce the disparity highlighted between Skelmersdale and the Northern parishes with regard to deprivation.</p>	Comments noted
62	<p>Section 1.4 of the Strategic Development Options Paper identifies a number of ‘key issues’ facing West Lancashire which should be addressed through the Local Plan Review. The following issues are considered to be particularly pertinent: - - “The issue of student accommodation in Ormskirk needs to be adequately addressed to ensure that sufficient provision is made to accommodate student demand; - - West Lancashire needs to be fuelled not just by providing land in the right location for new - employment premises to attract businesses (both large and small, established and new), but by - providing the right supporting context to attract those businesses which includes providing a skilled - local workforce, appropriate housing provision to accommodate employees and an attractive - environment and offer to retain and draw working age people to the area, especially graduates; and, - - There is a significant opportunity to boost the local economy, especially in the M58 corridor, as a - result of the Liverpool2 deep water terminal and expected surge in demand for logistics facilities and ‘spin-off’ industries. Skelmersdale is likely to be the most appropriate location for such opportunities given its excellent road access from the Port of Liverpool.” - We consider that the Council have successfully identified the most pertinent ‘key issues’ facing the borough. In particular we endorse the importance of the issues set out above, namely; the need to accommodate and manage student demand, the provision of appropriate housing, the retention of graduates and the potential of the borough to harness increased demand for logistics facilities. - The Council have identified the opportunity to boost the local economy, in particular the M58 Corridor, as a result of the Liverpool2 deep water terminal and the expected increase in demand for logistics facilities. With this in mind consideration should be given to the role that the borough can play within the sub-region and the North West. West Lancashire can play a role in accommodating unmet demand and development from the city regions of Greater Manchester and Liverpool as well as Central Lancashire. West Lancashire is a highly accessible location within the North West and its links with Liverpool, Greater Manchester and Central Lancashire will have an indirect effect on the Borough. It will be essential therefore that the Local Plan Review takes into detailed consideration these cross boundary issues and that these are suitably</p>	Noted

ID	Representor Comments	Council Response
	addressed. - Collective development needs will need to be met in full.	
64	Further consideration should be given to the role and impact that the Liverpool City Region has on West Lancashire, particularly in relation to the Objectively Assessed Needs (“OAN”) and employment land requirements within West Lancashire over the Plan period when this document is published.	Noted
69	Key issues must all relate directly to the need to support the projected population - number and profile - in a way that reduces our currently unsustainable impact on the planet and on our local environment.	Noted
70	Whilst the broad issues identified are generally correct, as outlined above, a greater - acknowledgment of cross boundary issues should be provided; especially in relation to the - potential need to accommodate future housing growth from nearby local authorities which - contain larger urban areas as well as links to the City Regions of Liverpool, Greater Manchester - and Central Lancashire. - - The Commissioners are pleased that issues such as an ageing population, decline in working - age population and need to boost economic development are identified. However it is clear - that these issues are all interlinked and this part of the paper does not explicitly acknowledge - this to any great degree. For instance, the ageing population and decline in working age - population are clearly strongly related. This in turn can cause a greater amount of commuting - in the area. Whilst commuting is mentioned within the issues, the importance of reducing this - in order to create sustainable patterns of development is critical if future policies are to be - sound. - - These issues along with the need to boost economic development and maximise economic - opportunities all point to an upward revision in West Lancashire’s housing target. Again, the - Commissioners would expect this to be referenced in this part of the document.	Comments noted
72	yes	Noted
73	Edge Hill University considers that the Council has successfully identified the most - relevant ‘key issues’ that need to be addressed through the Local Plan Review. - - WLBC has aspirations to continue the recent and ongoing steady growth in economic - activity; possibly at a higher rate. This ambition is supported by the University, although - it is acknowledged that economic growth may be challenging to achieve in the context of - an ageing population and declining workforce. Indeed, the 2014-based Sub-National - Population Projections indicate a decline of c. 5,900 working age residents in the - Borough by 2037. - - In the circumstances, WLBC must actively seek to promote new economic growth over - the plan period. This will include by: - - Ensuring that sufficient land for new employment uses is made available, and in - the right locations over the plan period. - • Providing sufficient support to existing businesses to enable their aspirations for - growth to be achieved. - • Developing a skilled local workforce. - • Creating an attractive environment which draws and retains working age people - to the Borough, especially graduates. - - Such an approach would be consistent with national policy which confirms that: - “Investment in business should not be over-burdened by the combined requirements of - planning policy expectations. Planning policies should recognise and seek to address - potential barriers to investment, including a poor environment or any lack of - infrastructure, services or housing” ³ .	Noted
75	Paragraph 3.3 in the paper makes reference to the designated Air Quality Management Area (AQMA) in Ormskirk town centre. Key Issues for Ormskirk with Aughton refers to traffic congestion in and around the town centre but it is recommended that this issue should be expanded to include reference to the AQMA in Ormskirk too. - Paragraph 7.6 in the paper makes reference to the percentage of economically inactive residents in the Western Parishes, including the proportion of retired people. Key issues for the Western Parishes refers to rural isolation and access but it is	Comments noted

ID	Representor Comments	Council Response
	<p>recommended that this issue should be expanded to include reference to the ageing population too. - Violent crime is acknowledged within the paper (paragraph 8.9) and hospital admissions for violent crime is listed as an indicator within the Sustainability Appraisal. - In West Lancashire, hospital admissions for violent crime are consistently above the England average. Safety and fear of crime should be recognised as an important aspect for planning policy and urban design consideration, especially in instances where perceptions of community safety might be preventing the full use of local facilities. Paragraph 2.7 (Skelmersdale with Up Holland) in the paper alludes to this with regard to the current limited usage of the network of footpaths, underpasses and footbridges around Skelmersdale, due to a perceived risk of crime. - As stated in the Government Planning Practice Guidance note on Designi - "It is important that crime reduction-based planning measures are based upon a clear understanding of the local situation, avoiding making assumptions about the problems and their causes. Consideration also needs to be given to how planning policies relate to wider policies on crime reduction, crime prevention and sustainable communities. This means working closely with the police force to analyse and share relevant information and good practice." - It is recommended that the preparation of the Preferred Options Paper takes account of guidance in the National Planning Policy Frameworkii, on preparing local plan policies which deliver good design and promote healthy communities (paragraphs 58 and 69). Potential developments should be judged by how they prioritise "safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion" and "safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas."</p>	
78	Traffic problems in local villages. Much to [sic] heavy for infrastructure.	Noted
79	<p>Story Homes considers that the Local Plan Vision should be clearly defined and positively - worded in order to ensure the vision underpins and informs all resultant policies. It is therefore - recommended that at the next stage of consultation the Council should establish the Vision - early in the Local Plan and ensure that it secures the support in principle from key stakeholders. - Story Homes believes the Local Plan offers an opportunity for West Lancs to set an ambitious - and challenging Vision which seeks to encourage betterment for the Borough and its existing - and future residents. - In line with the need for a clear and positive Vision for the Local Plan, the key Aims and - Objectives should be set out, incorporating matters such as the delivery of housing and - employment, As per the Vision policies can then be worded accordingly to demonstrate how - these Aims and Objectives would best be met. - In accordance with the NPPF, the presumption in favour of sustainable development should - form the golden thread of emerging policies, worded to encourage delivery of proposals in the - most appropriate locations where they are needed most. - Story Homes is clear that Green Belt release is required in West Lancashire to accommodate - the housing needs of the Borough as there is a shortage of deliverable housing land within the - existing urban area if the OAN is to be met. To provide for the housing needs and accounting - for the economic growth potential of West Lancashire in its sub-regional context, there are - "exceptional circumstances" to justify GB release subject to looking at all possible alternatives - such as safeguarded land (as detailed previously at paragraph 1.39 of the Housing White - Paper). - Density and Developable Areas - Story Homes considers that a density figure of 30 dwellings - per hectare (dph) and a net developable area ratio of 75:25 are reasonable in principle and - broadly in line with the housebuilding industry's approach to development, particularly in relation - to family homes. However, individual sites vary according to their specific physical - characteristics. As such, these figures should not be used as a constraint on the scale of - development which can be proposed by specific development sites, including safeguarded land, - when such land comes forward for</p>	Comments noted

ID	Representor Comments	Council Response
	<p>development. - HOW Planning LLP ("HOW") has been instructed by Story Homes to prepare and submit - representations to the West Lancashire Local Plan Review Issues and Options Consultation. - These representations have addressed the questions posed within the Strategic Development - Options Paper and the Social Policy Options Paper. - The work undertaken by Story Homes' appointed economic consultant would suggest a housing - requirement of close to Option C (400 dwellings per annum) to meet West Lancashire's - development needs. Should, however, West Lancashire agree to meet unmet need from - adjoining authorities, as suggested in the Strategic Development Options Paper, the housing - requirement will need to be higher. The Council's suggestion that it may deliver between 100 - and 200 dwellings per annum on behalf of adjoining authorities would also need to be added to - the OAN. As such, Story Homes reserves the right to make further comments on the - soundness, or otherwise, of the Council's approach to OAN once the approach within the - Housing Market Area (HMA) has been confirmed and agreed by the participating Authorities. It - will only be at this time, from a review of all the available evidence, that Story Homes will be - able to provide a fully evidenced opinion on the OAN required to meet West Lancashire's - housing needs. - Story Homes have great concern that the Local Plan Review proposes a baseline date of 2012 - (the same at the adopted Local Plan), as the Local Plan Review intends to be a new standalone - DPD and therefore should be based on up to date evidence and have a start date of 2017. With - regards to the length of time which the Local Plan Review should cover, Option 1: 2012 to - 2037, would be Story Homes' recommended time period. Local Plans must generate the - confidence that they are planning sustainably over the full plan period and Story Homes are - unconvinced that this could be achieved through a Local Plan which sets a Plan period of - approximately 35 years. Furthermore, the longer plan period is unlikely to be able to provide an - approach which will be sufficiently flexible to take account of changing market conditions over - the length of the plan period. - Story Homes considers it imperative that existing safeguarded sites should be released as a - priority in advance of the release of additional Green Belt land (see paragraph 1.39 of the - Housing White Paper), and that new safeguarded sites should be identified as necessary to - ensure the Green Belt boundaries do not need to be amended further at the end of the Plan - period. - Story Homes have considered the four scenarios for the proposed spatial distribution of - development and are of the opinion that Scenario 2, which proposes to focus development within Key Service Centres, would provide a reasonable starting point to determine the spatial - distribution of development within the Local Plan Review. Story Homes, however, consider that - an updated SHELMA would need to influence the proposed distribution of the OAN to each Key - Service Centre to ensure that the development allocations will be deliverable and developable. - In relation to the Social Policy Options Paper, Story Homes acknowledges and supports the - need for the delivery of additional affordable homes, provided this can be done in a viable - manner. - The above presents a summary of Story Homes' opinions based upon the information available - for review as part of the Local Plan Review Issues and Options Consultation and Story reserve - the right to make further comments as and when new evidence is published</p>	
81	<p>No. - - 1. The Key Issues states "the amount of best and versatile agricultural land in the Borough is regionally important resource and is vital to the high performing agricultural industry in West Lancashire". - - Evidence states that the best and most versatile agricultural land in the Borough (and critically the Northern Parishes) is NATIONALLY important, as opposed to simply regionally important. This recognition is not identified as a KEY ISSUE, nor is there any support proposed within the Issue and Options paper, to maintain the sustainable growth of the agricultural and food processing sector. - - Agriculture and food production are particularly important to the West Lancashire economy. According to agricultural</p>	Comments noted

ID	Representor Comments	Council Response
	<p>census data, there are 400 agricultural holdings in West Lancashire employing 2,300 people. The annual BRES data collected by ONS reports and additional 200 employees are employed in agriculture in 2015, in addition to those employed on farms. - - In terms of food processing, BRES data indicates that there are 2,250 jobs in food production in West Lancashire representing a third (32%) of the manufacturing jobs in the district and 4.7% of total jobs. - - Food production has been the source of much of the growth in manufacturing employment both in West Lancashire and also across GB. However West Lancashire has been much stronger growth accounting for 17.1% of manufacturing jobs since 2009, This has helped support overall growth of manufacturing employment in the borough, whereas GB has seen a fall in total manufacturing employment. - - Together, agriculture and food production account for 10% of jobs in West Lancashire compared to fewer than 3% nationally. Both of these sectors are, therefore vitally therefore a priority growth sector and important to the local economy and need to be included as a KEY ISSUE in the emerging Local Plan. - - 2. The Key Issues fails to address the infrastructure constraints within the Northern Parishes, and only explicitly identifies problems in Skelmesdale, Burscough and Orsmirk. - - Several road traffic assessments have been undertaken demonstrating the traffic and infrastructure constraints associated with the northern Parishes. This is also set out at Para. 2.36 of the Adopted West Lancashire Local Plan (2012-2027), in which "there are issued with traffic congestion in the two villages, particularly along the main Hesketh Lane/Station Road route. HGV's accessing agricultural and produce/packing facilities combine with local traffic, particularly at peak times, and can cause significant problems." - - In addition, the West Lancashire Highways and Transport Masterplan 2013 sets out the vision of constructing the Green Lane Link and route management strategy, as a direct solution to the infrastructure constraints associated with the Northern Parishes. - - This evidence base has not been included or referred to within the Spatial Portrait and needs to be included as KEY ISSUES in the emerging Local Plan. - - 3. Given the change in agriculture, and the nature of the agricultural sector, with specific reference to processing, packaging and distribution of agricultural products, both nationally and internationally, grown on agricultural land and processed in the Northern Parishes, the current policy framework is wholly inadequate. - - The emerging Local Plan needs to incorporate a specific policy framework that sets the parameters for development in relation to these important sectors, to enable the sustainable growth of this key industry within the Borough. - - 4. There is a clear lack of housing provision to support the continued and sustainable development of the agricultural and food processing industry within the Northern Parishes. It is identified (above) that this sector within West Lancashire has been much stronger growth accounting for 17.1% of manufacturing jobs since 2009 and account for 10% of jobs in West Lancashire compared to fewer than 3% nationally. Therefore, additional market housing is required to support this documented growth and boost the local economy, in close proximity to the place of work, being the Northern Parishes. - - The lack of housing to meet the demand of those employed in agriculture, results in expenditure leaking out to the neighbouring authorities. This relates to an identified Key Issue.</p>	
82	The key issues is the need to support the population in a way that reduces our impact on the environment.	Noted
89	This section of our report considers the Strategic Development Options Paper, which identifies a series of strategic development options for the amount and broad location of new housing and employment development. - Paragraph 1.1.7 of the Strategic Options Paper identifies WLBC's priorities: - "...it is important that whichever options are ultimately selected the Borough is enabled to grow economically, has good social infrastructure and its environment is protected and enhanced wherever possible..." - Our Client supports the principle of growth in West	Comments noted

ID	Representor Comments	Council Response
	Lancashire, this accords with the Framework’s requirement to positively and proactively encourage sustainable economic growth as well as significantly boost the supply of housing. - This Representation now addresses several of the key questions set out in the Paper.	
96	<p>Key issues for the Spatial Area are identified within Section 2 of the Spatial Portrait, and more detailed analysis - is provided at a borough-wide basis within Section 9 of the Spatial Portrait. We would note that at a local level - (i.e. within Section 2) no mention is made of the issue which is comprised of a recognition of having key heritage - assets (such as the Seminary, the Benedictine Priory and the former Ravenhead Brickworks) and the need to - identify opportunities to bring these into more effective active use. - Within Section 9, there is a paragraph which highlights the importance of designated nature reserves and the fact - that can be viewed equally as asset or constraint in certain circumstances. We conclude that it would be - appropriate in similar form to refer to built environment assets and set their future role as a key issue. - We agree that the changing demographic profile of West Lancashire is important and that weight should be - afforded to the need to meet the requirements of an ageing population. The Local Plan Review provides an - opportunity to improve the supply of housing to fulfil the needs of an ageing population and (perhaps) by giving - strong weight to schemes that can provide more substantial contribution to those specialist housing needs. - We also agree that the affordability of housing is a key issue and that it is fundamentally intertwined with the contrasting market strengths across the Borough. We feel that this has been exacerbated by previous policy directives to allocate more housing in some of the areas with poor market conditions and a suppression of delivery in other areas. - If higher levels of growth are to be achieved, then it will be important to reconcile the planned distribution of development with these housing market issues. There is a very clear affordability issue in West Lancashire, and the Local Plan Review provides an opportunity to improve the supply of affordable housing to fulfil unmet needs by increasing overall supply in areas with better market conditions and (perhaps) by giving strong weight to schemes that can provide more substantial contribution to affordable housing needs, or indeed to enable the completion of works to preserve heritage assets and bring them back into active use.</p>	Comments noted
97	<p>Multiple key issues are identified within Section 9 of the Spatial Portrait, but in our view these do not give remotely adequate weight to the urgent need to improve the town centre offer for Skelmersdale and provide credible employment opportunities and opportunity for evening economy choices that are simply absent. - If it were deemed that there was merit in pursuing a retail warehouse park within West Lancashire, national policy and the Council’s previous retail policy advice would strongly direct that investment towards town centre locations. The siting of any such facility outside town centres could easily prejudice the vitality of existing centres and planned investment. - This is particularly relevant in the context of Skelmersdale which has been subject of a long-held ambition to enhance and regenerate the town centre. The first priority for any potential retail warehouse park should be to ascertain whether it can be located within Skelmersdale town centre, in addition to the consented scheme between the Concourse and the College. Out-of-centre locations should be robustly tested against their potential to prejudice town centre vitality and the delivery of planned investment in Skelmersdale town centre.</p>	Comments noted
99	<p>Further consideration should be given to the role and impact that the Liverpool City Region has on West Lancashire, particularly in relation to the Objectively Assessed Needs (“OAN”) and employment land requirements within West Lancashire over the Plan period when this document is published.</p>	Noted
102	<p>It is important that decisions taken in relation to the future of West Lancashire should carefully be balanced against the impacts on the historic</p>	Comments noted

ID	Representor Comments	Council Response
	<p>environment. There may be instances where the level of growth in a particular area may not be able to accommodate growth due to its historic environment, conversely there may be opportunities for growth in areas, which may tackle, for example heritage at risk. The KEy issues therefore, should be amended accordingly.</p>	
103	<p>The inclusion of UpHolland and Bickerstaff with Skelmersdale as a single coherent area does not facilitate easy analysis of data and often statements are made that do not apply to the less densely populated and more affluent areas of Bickerstaff and Up Holland. - The issues raised for Skelmersdale and the SE parishes do not reflect the issues for Up Holland because the data is generalised. -</p>	<p>Noted. It is not always possible to find data for the individual areas, but where available and appropriate we will do our best to provide data separately for Up Holland, Bickerstaffe and Skelmersdale.</p>
107	<p>I will restrict my comments to areas I know. - The impact of Edge Hill University on the wider areas of the borough needs to be further explored. - How much employment does it bring to resident in within the borough. - How much Income is lost to the council through the loss of council rates and business rates through the uncontrolled expansion of HMO's includi g those on commercial premises</p>	<p>Noted</p>
110	<p>The policies try to address individual problems within the borough but the problem needs to be talked as a whole. What is seen as a cure for one specific problem only compounds the problems within the policy document as a whole. - The councils main aim of trying to invigorate Skelmersdale is totally flawed. The nettle that needs to be grasped is that NO ONE ACTUALLY WANTS TO LIVE THERE. - Burscough is a lively and vibrant town now, this is because of the new homes built there and to be built there. Yet Ormskirk is being left to die on its feet because of lack of vision and encouragement to build here.</p>	<p>Comments noted</p>

Question 7: What do you think of the draft Vision for the Local Plan? Does it cover all it needs to? Is it aiming for the right improvements?

ID	Representor Comments	Council Response
14	yes	Noted
17	We agree that Skelmersdale should be a focus for development.	Noted
18	The draft vision is a fair reflection of the Spatial portrait and the key issues. Whilst we would have preferred greater emphasis on meeting the needs of older people in the wording of the vision, it is appreciated that brevity is important and we do not consider any supplemental wording is necessary.	Noted
20	The question of providing affordable housing in Aughton has always been a 'bone of contention' with our group. Albeit local families and persons wishing to live in Aughton often find themselves 'priced out' and no 'affordable housing' available. It is a fact of life that housing in some areas is more expensive than others, with Aughton considered as a prime place to live. Very recent developments in Aughton have not included a proportion of affordable housing and any future developments are unlikely to do so as what the developers may consider as affordable will no doubt be beyond the reach of many..	Noted
21	It does not give enough space and importance to farming and food production.	Noted
24	The Vision seems to include many of the points I would consider important. There does not seem to be any mention of how we would use renewable energy within the Borough which I think is an important part of the future plan. Perhaps the Objectiver (8.) should be included in the Vision	Noted
26	This appears to address the requirements for the borough	Noted
28	Too much emphasis on housing, not enough given to rural land uses and the environment.	Noted
29	The local plan mentions all needs,like retirement housing,but the is no solution for elderly housing or a retirement village ,which would be a marvelous addition to West Lancashire. - There have been proposals and willing private investment,into a retirement village project,which need to be supported by the council.	Noted, the Local Plan will identify sites where such provision for housing for the elderly will need to be delivered.
30	Idealistic!. Improvement to the use of rail services to Skelmersdale could be made by provision of temporary car parking on the Pimbo Estate next to the railway line within easy walking distance of UpHolland Station. UpHolland is as far from the station as Skelmersdale but is better connected to the station by road. To chance finding a space at the informal parking spot opposite the station is foolish and the absence of designated parking, (and bus connection), prevents people from using the Manchester Victoria, via Wigan to Kirkby service. A positive promotion of parking at Pimbo may help reduce commuterYes parking and congestion at Appley Bridge..	Noted. There are limited locations where new parking for rail stations can be accommodated, however, the Council acknowledges that, wherever possible and where there is funding available, improved access to rail stations (be that in terms of car parking, walking, cycling or bus services) should be provided.
31	Good. Nothing contentious.	Noted
32	The aims seem well thought out	Noted
34	We support the Draft Vision for West Lancashire as it reflects the environmental assets within West Lancashire.	Noted
35	Overall the Vision for the Local Plan is supported. - The acknowledgement of the important role that the Borough can have within the Liverpool City Region is supported, as this will guide overall development within the	Noted

ID	Representor Comments	Council Response
	Borough through the Plan period. - Furthermore, the recognition that the three main settlements, including Burscough, will be the focus for new development demonstrates the Council's appreciation for the role these already play and that this can be further enhanced for the benefit of the wider Borough. - Additionally, the acknowledgment of the importance of the delivery of housing to support economic growth in the Borough is supported.	
39	Response A - Retain rural employment through retaining employment sites. provide more affordable accommodation for the elderly in rural areas to reflect changing population trends. - - Response B - 1 & 2 bed starter homes are needed in all areas especially in rural areas, however Local plans may also see this as desirable but don't have any influence on developers to build such housing. -	Noted
40	We note that specific reference is made to providing a fantastic range of housing, however, there is no specific reference to elderly or specialist elderly accommodation – these types of accommodation are critical to providing the right housing mix and choice, future iterations of this document should include such reference.	Noted
42	No comment at this time.	
46	The Vision accurately identifies the main issues especially in terms of employment and housing with a particular emphasis on the regeneration of Skelmersdale which should be the central focus for Housing and employment with corresponding environmental improvements which will help transform this important town of the Borough.	
48	The vision section should include a statement that all sections of the plan will take account of us all living within our means.	Noted
56	The Vision should make clear that if the economic aspirations of the Borough are to be achieved, family homes of a high enough quality must be provided in the right locations to help attract and retain a sufficiently skilled workforce within the Borough. - Taylor Wimpey supports various parts of the Draft Vision in so much as it: - 1 Recognises West Lancashire's 'highly accessible' location and links with neighbouring City Regions; - 2 Seeks for West Lancashire to be an 'outward looking proactive partner' which accords with the Duty to Co-operate; - 3 Seeks to unlock the growth potential of West Lancashire through job creation and providing opportunities for new and existing businesses; and, - 4 Identifies that an appropriate range and quality of housing is fundamental to supporting such growth; - The description of West Lancashire's location should go further and identify it as a major advantage in helping to achieve a thriving Borough with a vibrant economy. The opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general (such as the Superport and HS2) and easy access to the strategic roads network should also be highlighted. - The 4th bullet of the Draft Vision identifies that the Borough's three main settlements (Skelmersdale with Up Holland, Ormskirk with Aughton and Burscough) will be the focus of new development. The Draft Vision currently fails to acknowledge the need to also distribute new development to the Borough's other settlements in order to ensure their sustainable long term growth and to provide housing in appropriate locations to meet the needs of west Lancashire's growing population. This point is covered by Objective 6 (The right mix of housing), which Taylor Wimpey supports but it should also be included in the Vision. - It is also noted however that the Draft Vision doesn't include reference to the objective of contributing to the achievement of sustainable development contained in the Framework [§151] although this has clearly been a major consideration throughout the SDO Paper and is covered by Objective 1 (Sustainable Communities).	Noted
57	More needs to be done to address the isolation of Skelmersdale and its	Noted

ID	Representor Comments	Council Response
	community.	
58	The draft vision is supported, particularly the reference to aligning housing with economic growth.	Noted
59	<p>West Lancashire will be an attractive place where people want to - live, work and visit. The Borough will retain its local character - and will also make the most of its highly accessible location within - the North West and its links with the three City Regions of - Liverpool, Greater Manchester and Central Lancashire and to this - end will be an outward looking proactive partner within this - setting. - - West Lancashire will grow economically; creating jobs, attracting - new businesses and making sure that existing employers have - every opportunity to expand and succeed in the Borough, set - within the three City Regions context. - - West Lancashire will play its part in providing a fantastic range - of housing, at the right quality, as a fundamental factor in - delivering economic growth and leaving a lasting, vital legacy for - the next generations. This will include provision of affordable - housing to ensure positive impacts on the health, wellbeing, social - mobility and general quality of life for West Lancashire residents. - - The Borough's three main settlements of Skelmersdale with - Up Holland, Ormskirk with Aughton and Burscough will be the - focus for new development, with each town building on its - individual strengths but all three working together to reduce - inequality across the Borough by providing a well-rounded - employment base, opportunities for business and the right - residential mix. The regeneration of Skelmersdale in particular - will be vital to this and all three town centres will be more robust - and vibrant, offering what people need in a 21st Century town - centre. - - West Lancashire's fantastic potential will have been developed - through investment in young people through education and - training and in particular working with Edge Hill University and - West Lancashire College to ensure that a greater number of post - graduate jobs are created in order to retain skills and talents - within the Borough. - - In rural areas, Village and Hamlet settlements will retain their rural - character whilst seeking to provide local focal points for services - and employment, where appropriate, and the provision of good - quality affordable homes. The agricultural and horticultural - industry will continue to be a focus in rural areas. - - The identity and unique landscape of West Lancashire will be - valued, enhanced and sustained in accordance with best practice, - enabling people to access and enjoy all that it offers. This will - incorporate the Borough's historic buildings and character, its - valuable and important wildlife, habitats and biodiversity, its vital - agricultural role and its network of green spaces and waterways. - Infrastructure in West Lancashire will be improved and focused on - the places that need it, be that improved sustainable transport - options within and between the larger settlements and to key - locations outside of the Borough (such as the proposed - Skelmersdale Rail Link), improved utilities and communications, - improved education offer or improved health, community and - leisure infrastructure – all of which will provide a better, and - healthier, quality of life for those who live, work and visit in West - Lancashire.” - - Which comes first – the infrastructure or the development? So far, it has been the development, with the infrastructure lagging a long way behind -</p>	<p>Aside from that infrastructure which is required to enable a development to be built and occupied, it would be unusual to see new infrastructure put in place before new development is built, but what the Local Plan can help secure is the funding for, or future delivery of, infrastructure needed to make a development acceptable in planning terms.</p>
60	Redrow Homes and Wainhomes consider that the Spatial Vision is largely consistent with national policy. However they consider that the Local Plan Review should identify and release sufficient land to achieve the Vision.	Noted
61	I think the draft vision for the Local Plan is good. I think the three main settlements should be the focus for new development. - The natural environment is hugely important . Linear parks should be developed as well as open spaces for recreation and exercise. - High quality agricultural land should be "ring fenced" for food production. This is of national, not just local importance as the population continues to grow. Whilst people need housing, they primarily need food.	Noted

ID	Representor Comments	Council Response
62	<p>The draft vision put forward by the Council is broadly supported, in particular the emphasis on new - development being focused around the borough's main settlements of Skelmersdale with Upholland, - Ormskirk with Aughton and Burscough. - Ormskirk (with Aughton) is the second largest settlement in the Borough (this is recognised by its designation as a Key Service Centre in the Local Plan) and functions as the Borough's administrative centre, providing a wide range of facilities and services. The Council's own evidence suggest that the settlement is highly sustainable and it therefore follows that Ormskirk should accommodate a large amount of the borough's development as set out in any new Local Plan. - 90% of West Lancashire is designated as Green Belt, and therefore the borough is highly constrained. - Consideration should be given to whether there is sufficient brownfield land with the borough to - accommodate housing and employment requirements. If Green Belt release is required for residential and employment development then consideration should be given to the most appropriate locations for release, such as, new housing to be located on the edge of the most sustainable settlements, such as Ormskirk (with Aughton). Indeed, thought should also be given to market signals, to confirm areas where there is most likely to be demand for further residential development. Additionally, new employment sites should be located where the infrastructure can accommodate such development.</p>	Noted
64	<p>Our Clients are generally supportive of the proposed draft Vision for West Lancashire. The Spatial Vision is largely consistent with national policy, and will help bring forward positive change in terms of economic and social aspirations. - - The Vision should however be more aspirational and help to bring forward a change in perceptions of some of the settlements within West Lancashire, such as Skelmersdale across the Plan period. - - We also consider that it should identify the need for Green Belt release to help achieve the aspirations of the Borough. -</p>	Noted
67	<p>Broadly covers the correct visions and aspirations for West Lancashire. - However, economic development and growth to stimulate the renewal and regeneration of the Borough generally and Skelmersdale in particular should be identified as a key priority - consistent with the outputs from the 2014 West Lancashire Economic Study.</p>	Noted
69	<p>The Vision needs to state that West Lancashire will be a borough which lives within its environmental means. This includes reducing our environmental footprint. So the Plan must identify and facilitate ways of maintaining/improving quality of life for all while limiting our use of resources, not least conserving energy and water, and setting us on a path to eliminate the use of fossil fuels as agreed necessary by inter-governmental climate conferences. - The non-specific marketing term 'fantastic' is inappropriate in a legal planning document and should be removed from paragraphs 3 and 5.</p>	Noted
70	<p>The Commissioners believe that there are a number of positive aspects in the draft Vision, - however a number of key elements are missing which need to be covered so that there is no - ambiguity over what the Local Plan Review needs to achieve. We therefore believe that the - following should be added into the draft Vision: - • An acknowledgement that housing growth is needed to address issues of an - ageing population, declining working age population and to reduce commuting - patterns, as well and ensuring an appropriate balance between jobs and growth. - • The requirement under the Duty to Cooperate to potentially meet housing needs - of neighbouring authorities within West Lancashire; most notably in the longer - term. - • The opportunity to sustainably grow smaller settlements within West Lancashire - to ensure that these settlements remain vibrant and viable over the plan period. - • Requirement to re-examine Green Belt land in order to accommodate the growth - required in the Borough over the plan period.</p>	Noted, although the suggestions tend to relate to how a Local Plan will achieve its Vision, rather than about what West Lancashire should be like once this Local Plan is delivered.

ID	Representor Comments	Council Response
72	<p>I act as agent for small builders, self builders, investors and land owners across the North West and I think that there is a fundamental flaw in the vision in that the limitations imposed by 93% of the Borough being in green belt restricts investment and therefore negates growth. My clients want to invest in Wrightington settlements and its environs rather than Skelmersdale but there is a scarcity of developable land particularly for residential development due to the settlements being too small and restricted by green belt. Indeed you cannot even develop brown field land in the green belt. There is demand for housing from local families that cannot be satisfied.</p>	<p>Noted - the distribution of development needs is addressed through the options considered in Q12.</p>
73	<p>The draft vision presented in the Paper provides a positive framework for the Local Plan - review by setting out – at a high level – how the Council wishes the Borough to develop. - It will be important that the Vision evolves as engagement continues and the Local Plan - develops. - - In terms of setting a broad strategy for the plan, Edge Hill University agrees that it is - appropriate for the majority of new development over the plan period to be focused - within and adjacent to the Borough’s main settlements of Skelmersdale with Up Holland, - Ormskirk with Aughton and Burscough. - - Ormskirk (with Aughton) is the second largest and most populated settlement in the - Borough (after Skelmersdale)4. It functions as the Borough’s administrative centre and - provides a wide range of facilities and services, including a twice-weekly market, retail - opportunities, leisure and sports facilities, a hospital and railway and bus stations5. - Indeed the Council’s own evidence indicates that the settlement is highly sustainable. It - can and should accommodate a larger share of the borough’s development needs under - any new Local Plan. - - WLBC’s draft vision also recognises the important role that the University plays in - realising and maximising the potential of West Lancashire’s residents, increasing the - number of postgraduate jobs available and retaining skills and talent within the Borough. - This is supported.</p>	<p>Noted</p>
77	<p>Covers needs.</p>	<p>Noted</p>
78	<p>Yes- more attention to green belt though.</p>	<p>Noted</p>
81	<p>No. - - 1. The Vision is a clear repetition of the PREVIOUS vision's for the Borough over the course of the last 20 years, which primarily directs development to Skelmersdale (1999, 2005, 2013) and more recently Burscough and Ormskirk (2013). - - 2. There is clear NEGLECT of the needs of the Northern Parishes, which contains the highest proportion of best and most versatile land within West Lancashire and in turn, where the highest concentration of agricultural and food production economy is based. - - Agriculture and food production are particularly important to the West Lancashire economy. According to agricultural census data, there are 400 agricultural holdings in West Lancashire employing 2,300 people. The annual BRES data collected by ONS reports and additional 200 employees are employed in agriculture in 2015, in addition to those employed on farms. - - In terms of food processing, BRES data indicates that there are 2,250 jobs in food production in West Lancashire representing a third (32%) of the manufacturing jobs in the district and 4.7% of total jobs. - - Food production has been the source of much of the growth in manufacturing employment both in West Lancashire and also across GB. However West Lancashire has been much stronger growth accounting for 17.1% of manufacturing jobs since 2009, This has helped support overall growth of manufacturing employment in the borough, whereas GB has seen a fall in total manufacturing employment. - - Together, agriculture and food production account for 10% of jobs in West Lancashire compared to fewer than 3% nationally. Both of these sectors are, therefore vitally therefore a priority growth sector and important to the local economy and need to be included as key objective of the Spatial Vision in the emerging Local Plan. - - 3. It is STRONGLY disagreed that in order to provide a sustainable and 'well rounded' economy, the focus of new development is WHOLLY concentrated to the south of the Borough. i.e, Skelmersdale, Burscough</p>	<p>Concerns noted and to be considered as Local Plan Preferred Options prepared. The Council recognise the important role the agricultural sector plays in West Lancashire and, in particular, in the Northern Parishes, and the Local Plan will seek to meet identified and evidenced needs for new development that support the agricultural sector. However, this is not the only sector important to the West Lancashire economy, and so regard will also be given to other sectors which would necessarily be focused in the southern parts of the Borough.</p>

ID	Representor Comments	Council Response
	<p>and Ormskirk - this is wholly unsustainable and contrary to the objective of the NPPF. - - The Spatial Vision should be explicit in its support of the sustainable growth of rural villages; critically villages in the Northern Parishes, given that the agricultural and food processing economy generates 10% of jobs in West Lancashire and is a SIGNIFICANT contributor to West Lancashire Gross Domestic Product (GDP). - - The clear lack of support in this Spatial Vision is disappointing and does not provide any acknowledgement for this important contributor to the West Lancashire economy, and is CONTRADICTIONARY in its approach. - - Given the intention of this Local Plan is potentially for 30 years, this lack of support is worrying, as it will stagnate this important part of the Borough, in terms of its economic input, thereby restricting growth and threatening the agricultural and food processing sector in the Northern Parishes as a whole. - - The lack of support towards the agricultural and food processing sector in the Northern Parishes compromises the ability for this sector to continue to be recognised as a key player in the national agricultural market and throughout the UK as a whole. - - This draft Vision needs to be substantially amended and to EXPLICITLY commit to: - - - equal distribution of new development throughout the Borough, not directed wholly to the South of the Borough - - supporting the agricultural and food processing sector in West Lancashire and specifically Northern Parishes - - through this support, the commitment to delivering key infrastructure improvements, to enable this key economy to maintain its current input and sustainable growth - - through this support, the commitment to delivering housing to meet the needs of the existing and future job creation from the agricultural and food processing sector, specifically in the Northern Parishes - - Sustainable expansions of the existing village/rural settlements, through the development on land, in the following chronological order: - i. within existing settlement boundary - ii. Protected Land (that is a logical expansion of existing settlement boundary) - iii. Land released from the Green Belt, where appropriate, provided that the housing needs cannot be met by land within the policies (i and ii above) - - - a separate explicit policy to enable residential development on previously developed land within the Green Belt</p>	
82	<p>The vision needs to include the determination to live within our means, investing in renewable energy and reducing our carbon foot-print.</p>	Noted
89	<p>Section 1.4 of the Strategic Development Options Paper identifies the following issue: - "Whilst the number of people in the Borough is increasing relatively slowly, the population is ageing, with older age cohorts projected to grow very significantly both number-wise and percentage-wise over coming years. Conversely, the working age population is projected to decrease. This change in the make-up of the population is likely to place increased demand on the - provision (availability, accessibility and variety) of housing, services, health care, and appropriate training/ jobs for the older population, whilst the number of persons able to contribute towards providing such services decreases proportionally. It is also likely to have implications for job growth requirement, commuting levels, and general housing provision." - Our Client agrees that the ageing population will have significant implications on the employment market within West Lancashire. To encourage the retention of working age population within the Borough our Client recommends that additional employment land be allocated and that priority is given to the retention and expansion of existing businesses. - The fourth paragraph of the vision identifies that the Borough's three main settlements of Skelmersdale with Up Holland, Ormskirk with Aughton and Burscough will be the main locations for development. The principle of providing a greater quantum of development within the most sustainable locations, specifically Burscough is supported. This demonstrates the Council's commitment to sustainable development in accordance with the Framework as a whole.</p>	Noted
95	<p>In general, DWH is supportive in principle of the new Vision set out in the</p>	Noted

ID	Representor Comments	Council Response
	<p>SDOP, particularly in terms of: - The confirmation that the Borough's three main settlements of Skelmersdale with Up-Holland, Ormskirk with Aughton and Burscough will be the focus of new development and the intention to align housing with economic growth; and - A acceptance that the delivery of housing is a fundamental factor in delivering economic growth. - However, the draft Vision asserts that "West Lancashire will play its part in providing a fantastic range of housing...". This proposition falls very short of meeting full development needs as required by national planning policy and is not positively prepared. This Vision needs to be amended in this respect by confirming that West Lancashire will seek to meet its housing needs in full and provide a wide range of housing in the right locations – including in areas of high demand – to meet this need. - It would also be helpful if the draft Vision should be amended and expanded to include specific ambitions for each of the Borough's key spatial areas. This would assist in providing clarity and understanding in respect how WLBC expects growth and development to be successfully achieved in its areas, mindful that each is very different in character, scale, nature and issues.</p>	
96	<p>The Vision sets out an ambitious way forward for the Borough. It is difficult to reconcile how this could be achieved if the lower growth scenarios (especially scenarios A and B) were progressed. On the assumption that one of the more ambitious growth scenarios is taken forward, the Vision sets out improvements that are ambitious but deliverable and will result in tangible improvements in the performance of the Borough at a city region level. The delivery of affordable housing and accommodation for older people are hugely important, and needs to be afforded appropriate weight with reference to other policies with competing objectives.</p>	Noted
97	<p>The Vision sets out an ambitious way forward for the Borough. It is difficult to reconcile how this could be achieved if the lower growth scenarios (especially scenarios A and B) were progressed. On the assumption that one of the more ambitious growth scenarios is taken forward, the Vision sets out improvements that are ambitious but deliverable and will result in tangible improvements in the performance of the Borough at a city region level. The delivery of these regeneration ambitions are hugely important, and needs to be afforded appropriate weight with reference to other policies with competing objectives.</p>	Noted
98	<p>McDermott Homes broadly supports the vision for West Lancashire and welcomes reference to the fact that the Borough's three main settlements, including Ormskirk With Aughton, will be the focus for new development, with each of the towns identified building on their individual strengths.</p>	Noted
99	<p>Our Clients are generally supportive of the proposed draft Vision for West Lancashire. The Spatial Vision is largely consistent with national policy, and will help bring forward positive change in terms of economic and social aspirations. The Vision should however be more aspirational and help to bring forward a change in perceptions of some of the settlements within West Lancashire, such as Skelmersdale across the Plan period. We also consider that it should identify the need for Green Belt release to help achieve the aspirations of the Borough.</p>	Noted
102	<p>The historic environment and heritage assets are not just those classed as "buildings". The vision should refer to the historic environment to ensure that all assets/elements are covered.</p>	Noted
103	<p>Generally in the right direction. - Could include more on the provision of cycle and walking routes. Promotion of safe and sustainable healthy travel by walking and cycling could be given greater prominence. - How many journeys by car are less than 1 mile? -</p>	Noted
108	<p>Underpinning the entire vision is the need for sustainability of all the</p>	Noted

ID	Representor Comments	Council Response
	plans. - All public transport needs to be moved away from fossil fuels, housing needs to be designed and built to carbon neutral standards and high energy efficiency	
109	I believe this is broadly positive	Noted
111	<p>Section 2.1 of the Options Paper identifies a Draft Vision for the Borough. The fourth Paragraph - of the vision states: - “West Lancashire will play its part in providing a fantastic range of housing, at - the right quality, as a fundamental factor in delivering economic growth and - leaving a lasting, vital legacy for the next generations. This will include - provision of affordable housing to ensure positive impact on the health, wellbeing, social mobility and general quality of life for West Lancashire - residents.”</p> <p>Our client is of the opinion that this vision should be extended to include specific mention of the - need to address an ageing population. Section 1.4 of the Strategic Development Options Paper - identifies the following issue: - “Whilst the number of people in the Borough is increasing relatively slowly, the - population is ageing, with older age cohorts projected to grow very - significantly both number-wise and percentage-wise over coming years. - Conversely, the working age population is projected to decrease. This change - in the make-up of the population is likely to place increased demand on the - provision (availability, accessibility and variety) of housing, services, health - care, and appropriate training/ jobs for the older population, whilst the number - of persons able to contribute towards providing such services decreases - proportionally. It is also likely to have implications for job growth requirement, - commuting levels, and general housing provision.” As set out in the Social Policy Paper the number of residents aged 75 years and above is due to - increase by 75% up to 2037. This critical issue is not reflected fully within the vision and hence - an amendment should be made to state that West Lancashire will seek to provide adequate - housing/facilities/job opportunities to meet the needs of an ageing population. The fourth paragraph of the vision identifies that the Borough’s three main settlements of - Skelmersdale with Up Holland, Ormskirk with Aughton and Burscough will be the main locations - for development. The principle of providing a greater quantum of development within the most - sustainable locations, specifically Ormskirk with Aughton is supported. This demonstrates the - Council’s commitment to sustainable development in accordance with the Framework as a whole.</p>	Noted

Question 8: Are the draft Objectives seeking to achieve the right things? Are they specific enough, or are they too detailed? Have we missed anything out?

ID	Representor Comments	Council Response
9	I would like you to specifically state that you will not build on greenbelt land. No developer should even be permitted to consider building on green space until every single brownfield site has been exhausted.	All those developable brownfield sites in West Lancashire have been identified through the Council's Brownfield Land Register, and the supply of development they can provide will be accounted for in the Local Plan. However, this will not be sufficient to meet the development needs of West Lancashire. As such, some greenfield land will be required and, given how tightly drawn the Green Belt boundary is around settlements in West Lancashire, this will inevitably have to include some release of Green Belt land.
14	they seem comprehensive and correct	Noted
17	We agree with objectives regarding vibrant town and village centres but have a query how this will be achieved with regards Skelmersdale Town Centre?	Development proposals for Skelmersdale Town Centre have been in preparation for some time and while these have not progressed as quickly as the council would have hoped, they are moving forward and new development in Skelmersdale town centre will hopefully be coming forward in the very near future.
18	We support the wording of Objective 6: The right mix of housing, specifically the need to meet the diverse housing requirements of older people,	Noted
20	These draft objectives are wide ranging and somewhat complex. As far as objective 8 is concerned, I would again point out that the village of Aughton is fast losing its identity.	Noted
23	Yes, these are broadly appropriate	Noted
24	The Objectives appear to cover all the areas I would consider important. Sustainability needs to run through the whole of the Objectives and Vision	Noted
26	Yes they appear to be fair and balanced	Noted
28	Objective titles are reasonable but the definitions are open to interpretation, for example sustainability is not fully reflected and the economic aspect is dominant at the expense of the environment and society. - There should be 3 equal aspects to Sustainability .	Noted
29	The local plan mentions all needs,like retirement housing,but the is no solution for elderly housing or a retirement village ,which would be a marvelous addition to West Lancashire. - There have been proposals and willing private investment,into a retirement village project,which need to be supported by the council.	As comments above
30	Yes. But the authors should recognise that land use planning cannot solve many issues of health and inequality (however measured) and sustainability and recognise that rural West Lancashire is an attractive place to live to those who work in Manchester and Liverpool because of its geen belt and ambiance. Its economy is dependent, in part on these conurbations. It should not seek to provide services to Liverpool superport that are better provided on dockland adjacent to the port.	Noted
32	The draft objectives are seeking to achieve the right things in my opinion. The specifics are adequate, however detail is sorely lacking. Even within the	Noted

ID	Representor Comments	Council Response
	option paper.	
34	Section 2.2 Objectives - Flood risk is highlighted as an important issue in section 1.4 however, there is no mention of flood risk within any of the objectives. The impacts of flooding can have a great impact on the economy and people's health alongside the environment. Flood risk could be included within Objective 3 as part of ensuring West Lancashire can adapt to Climate Change and ensuring the Local Plan can provide a high quality built environment. - Flood Risk could also be incorporated into Objective 10. A catchment management approach to flood risk including using 'slow the flow' techniques upstream can greatly help to reduce localised flood risk and more natural land management techniques can be incorporated into the improvement/creation of green spaces. Pollution reduction by enhancing green spaces such as the installation of reed beds could also be considered within Objective 10.	Noted
35	The draft objectives are considered to be appropriate for WLBC and will achieve the Vision, as identified. The level of detail provided for each objective is appropriate, as this allows sufficient flexibility for more detailed matters to be addressed within specific policies whilst also ensuring the policies seek to achieve a common set of aims. - Objective 6 is fully supported by Bloor Homes and UKLP and will ensure the housing needs of the population, and the future population are met.	Noted
39	Response A - The objectives need detail support of specific issues to achieve the objectives. - - Response B - It is difficult in the initial consultation to comment until the draft plan is ready for consultation. -	Noted
40	Our client agrees with draft objectives. It will be critical for future policies to be carefully drafted to ensure these objectives can be realised.	Noted
42	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. - - We welcome the green infrastructure aspects of the draft "A Healthy Population" objective and note that those are repeated in the "A natural environment" objective. - - "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." - - Whilst welcome in apparent intent, this draft objective on "A natural environment" makes no specific reference to ecological networks. It also conflates the needs of wildlife ("biodiversity") with that of green infrastructure for people ("a network of green spaces, waterways and connecting Linear Parks"). It further mixes these with some economic objectives relating to tourism and agricultural production and with some social objectives relating to rural (but not urban) communities. - - We suggest the following rewording, or similar, would refine and focus the objective: - - To improve and make the most of our borough's "green" assets: by protecting, enhancing, restoring and expanding its ecological networks and the native biodiversity that these support (including Habitats & Species of Principal Importance); and by protecting and enhancing our borough's green infrastructure (e.g. green spaces, greenways, watercourses, canals, linear parks, and soils) and so securing and improving the ecosystem services that such infrastructure provides to our rural, urban and coastal residents, businesses and employees, and visitors. - - We are broadly supportive of the other draft objectives, insofar as the content of each falls within our environmental charitable remit.	Noted

ID	Representor Comments	Council Response
46	The Objectives are balanced across the needs for the Borough and provide a robust approach towards tackling some of the main issues identified in the Spatial Portrait Paper, which also reflect the responsibilities have for wider issues such as Climate Change, Housing, the Natural Environment and the Economy.	
48	Objective 3 should say A high quality sustainable built environment - Objective 6 should say The right mix of sustainable housing - Objective 7 should say A vitalised sustainable economy - Objective 10 should say A vibrant and sustainable natural environment	Noted
56	The Objectives in the SDO Paper are generally supported but Taylor Wimpey wishes to comment in relation to specific Objectives. - Taylor Wimpey generally supports the principles in Objectives 1, 3 and 4 aimed at achieving sustainable, high quality development that helps address climate change. The Council must however ensure that the Local Plan does not place unnecessarily burdensome requirements or standards on developments to the point that viability and deliverability is impacted. Taylor Wimpey reserves the right to comment on such issues at the next stage of preparing the Local Plan. - Taylor Wimpey supports Objective 5 (Reduced Inequality) and believes it is important to plan for new development and improved infrastructure in ways which reduce inequality by addressing areas of identified and hidden deprivation across the Borough. The Council must ensure that the overall distribution of development and the Vision also reflect this. - Taylor Wimpey particularly supports Objective 6 (The Right Mix of Housing) regarding the provision of a wide range of housing types and tenures in appropriate locations to meet the needs of West Lancashire's growing population. Again, the overall distribution of development and the Vision also need to reflect this. - Taylor Wimpey welcomes that Objective 7 (A Vitalized Economy) reflects the economic opportunities presented by the Borough's location. - Taylor Wimpey generally supports Objective 8 (Vibrant Town and Village Centres) aimed at creating vitality and vibrancy at the heart of each community but again notes that this must be supported by an appropriate distribution of new development.	Noted
57	Although the objectives are unobjectionable in themselves, they are rather anodyne and generic and could come from any local plan document in any part of the developed world at any time in the past 50 years. A focus on West Lancashire objectives would be welcome.	Noted
58	The draft objectives are considered appropriate both in terms of detail and range. We particularly welcome objective 6.	Noted
61	The draft objectives are seeking to achieve the right things	Noted
64	Our Clients are generally supportive of the proposed Objectives on the basis that they are largely compliant with the NPPF. However, it is felt that generally they should be more aspirational and pro-growth based. We set out below our comments in relation to specific Objectives as drafted. - •Objective 1 – Whilst we are encouraged by the Council's approach to ensure that sustainability is a guiding principle, we consider that at the outset, the Council should strengthen this and clearly set out its presumption in favour of sustainable development and refer to the NPPF within this Objective. - •Objective 4 – Whilst our Clients are supportive of the Council's approach in ensuring that new development helps to contribute towards the creation of a low carbon environment, the Council must ensure that any requirements are not too onerous that they restrict or prevent development coming forward. - •Objective 7 – Our Clients do not consider that this Objective is sufficiently aspirational. The Council should seek to take this opportunity to bolster the economy of West Lancashire rather than downplaying its role to providing opportunities for "appropriate development". -	Noted
69	Add the word 'sustainable' to objectives 3, 6 and 7, 'sustainable' meaning	Noted

ID	Representor Comments	Council Response
	that the construction, servicing and usage involved must not compromise the survival/quality of life/prospects of future generations, nor of other communities or species.	
70	Consistent with our comments above, Objective 6 (The Right Mix of Housing) needs to be - much clearer on the need for housing growth to address the issues identified earlier and to - ensure the balance of jobs growth and new homes are achieved in order to create sustainable - patterns of development.	Noted
72	No, the objectives should seek to achieve development where the demand is strongest. the extent of settlements particularly in the Eastern Parishes such as Wrightington Bar is too limited and unsustainable and green belt should have natural (such as streams) and existing man made boundaries (such as main roads) to ensure that they are robust in the right places. the green belt and settlement boundaries follow redundant land use patterns and appear to be wash over in nature rather than thought out for growth and sustainability.	Noted, although demand cannot be the only consideration against which a Local Plan is formulated, hence the Objectives cover a wide range of matters.
73	WLBC's proposed objectives appear appropriate at this stage; however, as with the - Vision, it will be important that the detail of the objectives are reviewed at each stage of - the Local Plan review and continue to evolve as the detail of the Plan is developed. This is supported.	Noted
77	Could be more specific.	Noted
78	Could be more specific	Noted
81	<p>The Objectives are too vague to be able to inform how the Vision will be delivered. Critically, we consider that the Vision is wholly imbalanced towards development in the south of the Borough and does not provide any vision or support for the Northern Parishes, its residents and agricultural and food processing economy. - - 1. The Vision is a clear repetition of the PREVIOUS vision's for the Borough over the course of the last 20 years, which primarily directs development to Skelmersdale (1999, 2005, 2013) and more recently Burscough and Ormskirk (2013). - - 2. There is clear NEGLECT of the needs of the Northern Parishes, which contains the highest proportion of best and most versatile land within West Lancashire and in turn, where the highest concentration of agricultural and food production economy is based. - - Agriculture and food production are particularly important to the West Lancashire economy. According to agricultural census data, there are 400 agricultural holdings in West Lancashire employing 2,300 people. The annual BRES data collected by ONS reports and additional 200 employees are employed in agriculture in 2015, in addition to those employed on farms. - - In terms of food processing, BRES data indicates that there are 2,250 jobs in food production in West Lancashire representing a third (32%) of the manufacturing jobs in the district and 4.7% of total jobs. - - Food production has been the source of much of the growth in manufacturing employment both in West Lancashire and also across GB. However West Lancashire has been much stronger growth accounting for 17.1% of manufacturing jobs since 2009, This has helped support overall growth of manufacturing employment in the borough, whereas GB has seen a fall in total manufacturing employment. - - Together, agriculture and food production account for 10% of jobs in West Lancashire compared to fewer than 3% nationally. Both of these sectors are, therefore vitally therefore a priority growth sector and important to the local economy and need to be included as key objective of the Spatial Vision in the emerging Local Plan. - - 3. It is STRONGLY disagreed that in order to provide a sustainable and 'well rounded' economy, the focus of new development is WHOLLY concentrated to the south of the Borough. i.e, Skelmersdale, Burscough and Ormskirk - this is wholly unsustainable and contrary to the objective of the NPPF. - - The Spatial Vision should be explicit in its support of the sustainable growth of rural villages; critically villages in the Northern Parishes, given that the agricultural and food processing economy generates 10% of jobs in West</p>	Concerns noted and to be considered as Local Plan Preferred Options prepared.

ID	Representor Comments	Council Response
	<p>Lancashire and is a SIGNIFICANT contributor to West Lancashire Gross Domestic Product (GDP). - - The clear lack of support in this Spatial Vision is disappointing and does not provide any acknowledgement for this important contributor to the West Lancashire economy, and is CONTRADICTIONARY in its approach. - - Given the intention of this Local Plan is potentially for 30 years, this lack of support is worrying, as it will stagnate this important part of the Borough, in terms of its economic input, thereby restricting growth and threatening the agricultural and food processing sector in the Northern Parishes as a whole. - - The lack of support towards the agricultural and food processing sector in the Northern Parishes compromises the ability for this sector to continue to be recognised as a key player in the national agricultural market and throughout the UK as a whole. - - This draft Vision needs to be substantially amended and to EXPLICITLY commit to: - - equal distribution of new development throughout the Borough, not directed wholly to the South of the Borough - - supporting the agricultural and food processing sector in West Lancashire and specifically Northern Parishes - - through this support, the commitment to delivering key infrastructure improvements, to enable this key economy to maintain its current input and sustainable growth - - through this support, the commitment to delivering housing to meet the needs of the existing and future job creation from the agricultural and food processing sector, specifically in the Northern Parishes - - Sustainable expansions of the existing village/rural settlements, through the development on land, in the following chronological order: - i. within existing settlement boundary - ii. Protected Land (that is a logical expansion of existing settlement boundary) - iii. Land released from the Green Belt, where appropriate, provided that the housing needs cannot be met by land within the policies (i and ii above) - - On the basis of the amendments to the draft vision, set out above, the existing Objectives should then be revised to support and new objectives should be prepared. - - Explicitly, a new Objective 11 - support of agricultural and food processing economy in Northern Parishes</p>	
89	<p>Section 2.2 outlines the objectives of the Plan. Objective 7 states: - “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.” - Our Client supports the acknowledgment that West Lancashire should play an increased role through encouraging businesses to locate within the Borough. It is also recommended that this Objective be extended to consider the retention and expansion of existing businesses. The retention and expansion of existing businesses may assist West Lancashire in attracting more businesses and those of a working age to the area. - Objective 9 considers Accessible Services and states: - “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.” - Our Client supports the delivery of development within accessible locations as this will significantly improve the sustainability of proposed developments, increase the viability of existing services and provide improvements in locations where the benefit will be experienced by the most people.</p>	Noted
95	<p>DWH is broadly supportive of the 10 draft Objectives set out in the SDOP. However, it is noted that: - 6 - • As with the draft Vision (see above), neither ‘Objective 1: Sustainable Communities’ or ‘Objective 6: The Right Mix of Housing’ specifically identify or refer to the importance of meeting the full housing needs of the Borough as required by national planning policy. - ‘Objective 6: The Right Mix of Housing’ identifies the types of housing which might be required to meet the needs of particular groups, such as affordable homes, student homes, elderly accommodation, etc. However, it does not refer to the importance of providing family homes</p>	Noted

ID	Representor Comments	Council Response
	<p>which are critical to attracting younger and working age households to the Borough, particularly given the ageing of the population; and - • ‘Objective 7: A Vitalized Economy’ could be more positively worded, for example to state that the Local Plan Review will seek to identify and deliver sustainable growth opportunities which are not currently provided for, which can deliver a step-change the economic performance of the Borough and raise its profile both within the Merseyside sub-region and beyond. Such an approach would be consistent with the requirement of the NPPF for Local Plans to be “...aspirational but realistic...” (paragraph 154) and to not only meet needs but “...respond positively to wider opportunities for growth...” (paragraph 17). - 3.7 DWH respectfully requests that the above draft objectives are amended prior to the next draft of the Local Plan Review.</p>	
96	<p>AIUH supports objectives 1-3, 5, and 8-10. - We express some reservations in terms of objective 4, it is considered that reference to the targets from the COP 21 Summit may be unnecessarily geared towards the use of renewable technologies rather than forming part of a package to reduce carbon emissions with more of an emphasis on reducing net energy demand. - We fully support objective 6, and highlight that there are clear opportunities in Up Holland (notably the former - St Joseph’s Seminary area) promoted by AIUH that can provide substantial contribution to the delivery of - affordable housing and accommodation for older people, whilst also resulting in the opportunity to bring heritage - assets back into active use. It is also feasible that the location of new development can gravitate to the existing development limit, thereby creating a contiguous and sensible extension of the urban area, which mitigates impacts upon the openness of the Green Belt and the setting of heritage assets.</p>	Noted
97	<p>St Modwen supports objectives 1-3, 5-6 and 8-10. We express some reservations in terms of objective 4, and whilst we support the principles it is considered that reference to the targets from the COP 21 Summit may be unnecessarily geared towards the use of renewable technologies rather than forming part of a package to reduce carbon emissions with more of an emphasis on reducing net energy demand. - We fully support objectives 7 and 8, and highlight that the Skelmersdale Town Centre development promoted by St Modwen represents the most important project to deliver improvements to the vitality of key centres and will generate substantial employment and economic activity for the Borough as a whole.</p>	Noted
99	<p>Our Clients are generally supportive of the proposed Objectives on the basis that they are largely compliant with the NPPF. However, it is felt that generally they should be more aspirational and pro-growth based. We set out below our comments in relation to specific Objectives as drafted. - • Objective 1 – Whilst we are encouraged by the Council’s approach to ensure that sustainability is a guiding principle, we consider that at the outset, the Council should strengthen this and clearly set out its presumption in favour of sustainable development and refer to the NPPF within this Objective. • Objective 4 – Whilst our Clients are supportive of the Council’s approach in ensuring that new development helps to contribute towards the creation of a low carbon environment, the Council must ensure that any requirements are not too onerous that they restrict or prevent development coming forward. • Objective 7 – Our Clients do not consider that this Objective is sufficiently aspirational. The Council should seek to take this opportunity to bolster the economy of West Lancashire rather than downplaying its role to providing opportunities for “appropriate development”.</p>	Noted
102	<p>The Plan should include a specific objective on the hisotirc environment. The historic environment and heritage assets are not just those classed as "built" (title of Objetive 3). The wording used in the Plan and inparticular objective 3, does not reflect the terminology of the NPPF in that it refers to hisotric features, for example. This should be amended accordingly.</p>	Noted

ID	Representor Comments	Council Response
108	All objectives need to be sustainable . The built environment should be high quality and carbon neutral, food growing should be moving towards organic, which employs more people and is healthier without the chemicals ,	Noted
110	These are admirable policies, but most will fail due to the councils mind set focused mainly on Skelmersdale.	Noted
111	Section 2.2 outlines the objectives of the Plan. Objective 1 states the following: - "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." Our client agrees with the inclusion of a balanced mix of housing and tenures. However, it is recommended that this could be improved to recognise the delivery of elderly housing. As is discussed previously, West Lancashire has an ageing population and the delivery of housing for - this population needs to be considered and delivered. - Objective 6 states: - "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 and residential caravans and - house boats." - Our Client supports the acknowledgment that the needs of the growing population must be met - and in particular the reference to accommodation for older people. Objective 9 considers Accessible Services and states: - "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." Our Client supports the delivery of development within accessible locations as this will significantly improve the sustainability of proposed developments, increase the viability of existing - services and provide improvements in locations where the benefit will be experienced by the most - people.	Noted

Question 9: Which option for the amount of housing and employment land required per year do you think is the most appropriate for West Lancashire? Why?

ID	Representor Comments	Council Response
1	16 ha 400 houses	Noted
2	16 ha 400 dwellings	Noted
9	Option A as it is least development. Even this is too much. This area is a desirable location to live because it is semi-rural. Development at the levels suggested would not be "making the most of our green borough" nor would it be sustainable. It will ruin the character of this agricultural area, irreversibly.	Concerns noted. However, national planning policy requires each area to at least meet its own development needs, and so Option A is the very bare minimum level of development that West Lancashire would have to provide.
14	I don't know	Noted
18	No comment	
19	West Lancashire is a beautiful region to live in especially because it has a lot of agricultural land and other Green space. The size of our region is however not getting any larger hence if our Grand children are to enjoy the same beautiful region we need to safeguard un developed land. Any of the above options will year on year shrink the green space available to a growing West Lancashire population. For that reason I would really like to see a proposal for 0ha of land for dwellings and 0ha for employment land and instead develop our existing brownfield sites and use the developed space more densely. As this option is currently not available I would propose option A.	<p>Concerns noted. However, national planning policy requires each area to at least meet its own development needs, and so Option A is the very bare minimum level of development that West Lancashire would have to provide.</p> <p>All those developable brownfield sites in West Lancashire have been identified through the Council's Brownfield Land Register, and the supply of development they can provide will be accounted for in the Local Plan. However, this will not be sufficient to meet the development needs of West Lancashire. As such, some greenfield land will be required for development.</p>
20	Option A is the most appropriate as it is inline with the current local plan and the needs of West Lancashire. Other options appear to more so designed to assist other Boroughs and their needs.	Noted
21	The land should not be used for housing and employment development. the government states - only use brown field sites.	<p>Concerns noted. However, national planning policy requires each area to at least meet its own development needs, and so Option A is the very bare minimum level of development that West Lancashire would have to provide.</p> <p>All those developable brownfield sites in West Lancashire have been identified through the Council's Brownfield Land Register, and the supply of development they can provide will be accounted for in the Local Plan. However, this will not be sufficient to meet the development needs of West Lancashire. As such, some greenfield land will be required for development.</p>
23	A. Energy and expense should be spent on improving what already exists, rather than building on fresh land.	Noted, however, even if investment were available to improve what already exists, this would not create the level of new development needed to meet the housing and employment needs of West Lancashire.
24	You say that the community in the future will have a greater number of	Noted

ID	Representor Comments	Council Response
	elderly people and will be a slow growing community. As a lot of the Borough is rural, it seems to me that housing and employment land set aside should be minimal - therefore agreeing to A or less than that	
26	No comment	
28	Options difficult to assess as the amount of housing land is tied to employment land. - Also it is not clear as to whether this is new employment land or remodelling of existing premises and land. - In addition there is no option for regeneration and improvement of existing properties. - - Within these limited options it would have to be Option A with employment land in the existing industrial areas with good infrastructure and housing mainly within Skelmersdale and not Up Holland. Small housing schemes should be developed as necessary to ensure vibrancy of small villages such as Down Holland.	Noted
30	Options A or B. No one yet knows the land requirements (if any) of Greater Manchester or Liverpool approved spatial frameworks. There should be emphasis on much higher densities in town centres and adjacent to good transport links in West Lancashire than proposed. There should be landmark ,iconic high rise flats to take advantage of the magnificent views of West Lancashire.	Noted. The Duty to Co-operate requires local authorities to co-operate as they prepare Local Plans and so the Council are aware of the emerging proposals for Greater Manchester and the Liverpool City Region Spatial Frameworks and has taken them into account as the West Lancashire Local Plan is prepared.
31	Option B - The spatial Portrait anticipates a population increase of 4,300 residents by 2037. This equates to 215 new residents per annum therefore option B (300 dwellings per annum) should be plenty.	Noted
32	Option A seems to provide adequate dwelling numbers. However option B may be preferable given the need for employment provision and to give flexibility.	Noted
34	We agree with the need to investigate infrastructure and environmental impacts as part of selecting the most appropriate option as stipulated within paragraph 3.2.8. This should also consider the potential economic impacts for example in terms of adapting to flood risk and the visitor economy whilst also investigating the potential for securing enhancements as part of future development.	Noted
35	At this initial stage, it is considered that most appropriate for the delivery of housing and employment within the Borough will be an amount of land per year which is greater than that provided by Option B, and strives to achieve the amount provided through Option C. the reasons for this preliminary conclusion are set out below: - • WLBC identify themselves that Option A is the very minimum level of new development which would be needed. This approach is not aspirational and is therefore not appropriate for the Plan period. - • Option B reflects a housing scenario that incorporates forecasted job growth, this approach is supported, and is reflective of the Vision proposed. However, the question is raised as to whether this approach is aspirational enough. - Option C seeks to deliver a greater number than is necessary in WLBC, as this would help meet a wider sub-regional need. This approach is supported, as will promote the role of West Lancashire within the Liverpool City Region and attract further investment to the Borough. - • Options D and E both promote a greater level of development above the OAN, with that proposed within Option E as being identified as ‘extremely challenging to deliver, especially for housing’. These options are not considered to be appropriate, it is acknowledged that housing targets should be optimistic, however they should also be realistic to prevent a negative approach being taken to the delivery of such levels, which may further hinder development coming forward and adversely affect housing delivery. - Notwithstanding the above, we draw attention to the fact that the LCR SHELMA has not been published alongside the consultation document (as stated at Paragraph 3.2.2) and the outcome of this will significantly influence the Local Plan	Noted

ID	Representor Comments	Council Response
	<p>Review. Therefore, there may be the need for West Lancashire to meet unmet need from authorities in the Region, as is discussed within Paragraph 3.2.11, however the extent of this is unknown at present and as such the amount of development land required within West Lancashire is not yet full known and tested. Bloor Homes and UKLP reserve the right to provide further representations on this matter when further evidence in relation to the development requirements of the wider City Region are fully understood and the implications of such are recognised.</p>	
39	<p>Response A– Option C - - Option C – Increases greenbelt release over existing Local Plan but responds to employment, housing, land needs. -</p>	Noted
40	<p>Option E (the highest level of growth) is essential. The background evidence clearly demonstrates that it is only this option that would likely meet the full affordable housing need. Whilst it is inevitable that this would lead to the release of Green Belt land, given the high proportion of Green Belt land in West Lancashire, the overall release would be very small when considered on balance. This is the option that will deliver the desired levels of economic growth, that maximises the opportunity and will provide the flexibility to provide the fantastic range of housing that has been referred to in this consultation.</p>	<p>Noted, however, it must also be a consideration of whether aiming for higher numbers simply to meet full affordable housing need will actually be deliverable in relation to the house-building industry being able to deliver that quantum of housing year-on-year.</p>
42	<p>The impact of development on our core remit of recovery of nature and functional ecosystems is primarily spatial, so it is difficult to comment on generic intensity of development other than to note that, if no other policies, constraint sand opprtunities were to be in play, increasing hectarage of development would statistically increase the chances of negative impacts on the district's ecological network, its components and functionality . Similar concerns would arise with the district's green infrastructure and its associated ecosystem services. To mimise susch risks we would expexct to see strong protection provided in Development Management Policies for ecological networks, including the whole hierarchy of designated wildlife sites, and for habitats & species of principal importance. In designing development schemes, regard must be had to ensuring that the biodiversity of the development sites is protected, and wherever possible enhanced, with links to the identified surrounding ecological network. - - We would also wish to see similar protection for established green infrastructure and the enhancement of the ecosystem services that it provides.</p>	Noted
46	<p>Option D. because of the need for balance between the right type of housing in the right areas with corresponding employment land to provide the right environment for an ambitious West Lancashire. Too low a housing figure would be unrealistic, would fail to provide critical mass to deliver the future needs of the Borough and the wider Liverpool City Region and would risk the imposition of development in areas least suitable for the needs of the Borough.</p>	
47	<p>For me, those areas of land for housing and employment are not something that I can conceive of. What I will say is that I am a big fan of mixed use planning zones. For example, when new housing estates are built they shouldn't just be dormitory communities with no amenities. There should be workplaces, schools, shops and leisure facilities nearby. I am not in favour of out of town shopping developments. Also, single use zoning with all the factories far from the homes of low income employees who do not have cars, with these factories not served by public transport is a big problem for Skem folk who work on Pimbo industrial estate.</p>	Noted
48	<p>What forecasts have been used? How accurate are they? We don't know the answer to this as we have not seen the data. However whatever forecast is used it must take into account already allocated land for both industrial and social use. It must also take the nationally important high quality agricultural land and it's retention into account.</p>	<p>Noted. The Issues and Options Papers refer to the Strategic Housing and Employment Land Market Assessment (SHELMA) which provided the basis of the calculation of development needs. The West Lancashire Housing and Economic Development Needs Assessment (HEDNA), which was provided on</p>

ID	Representor Comments	Council Response
		the Council's website with the Issues & Options consultation, summarised the findings of the SHELMA vis-à-vis West Lancashire.
50	<p>This variable presents five options in relation to the amount of development land required per year: - A. Approximately 8 ha of land (for 200 dwellings) per year and 2 ha of employment land per - year; - B. Approximately 12 ha of land (for 300 dwellings) per year and 3 ha of employment land per - year; - C. Approximately 16 ha of land (for 400 dwellings) per year and 4 ha of employment land per - year; - D. Approximately 20 ha of land (for 500 dwellings) per year and 5 ha of employment land per - year; and - E. Approximately 24 ha of land (for 600 dwellings) per year and 6 ha of employment land per - year. - The options range from what is considered to be the very minimum level of new development that - West Lancashire needs, to the absolute maximum. - Options C, D and E all assume that West Lancashire will, on some level, look to accommodate an - unmet need for housing and employment from the Liverpool City Region (LCR). These options - specifically state that in regards to employment land this will be large-scale logistics. It is not yet - determined whether this unmet need will materialise, and this will become clearer through the Plan - process and through the progression of neighbouring authorities' Local Plans. - However, it is evident that were there a need to provide for the LCR's demand for large scale - logistics employment sites, these are likely to have a significant impact on the SRN, over and - above the general employment needs of the Borough. Indeed, these same demands on the SRN - may also occur as a result of the unmet housing need; the social and economic ties of 'new' - residents to the LCR generating a desire to frequently travel to and from this area. - - Until there is further clarity over the exact requirements of neighbouring authorities, 'worst - case' scenarios (in terms of vehicular demand) associated with Option E should be - considered in order to quantify the existing infrastructure capacity, and the potential for - cost-effective improvement works to facilitate the upper level of development.</p>	Noted
54	<p>Issue 1 of the Strategic Development Options Paper seeks views on the amount of development land required. Whilst we strongly support a more ambitious development target (Options C, D or E as outlined in the Options Paper) which does not seek to constrain development activity, we would emphasise that it is important that any development target must be a minimum and should not act to prevent sustainable development from being brought forward in suitable locations.</p>	Noted
56	<p>The overall amount of development land required will be significantly influenced by the Liverpool City Region SHELMA work. The draft SHELMA has not yet been published. Therefore, whilst Taylor Wimpey provides some general comments below on housing requirements and the different Options set out in the SDO Paper, it reserves the right to comment further on this issue at the next stage in the preparation of the Local Plan. It should also be noted that Taylor Wimpey has not carried out a detailed review of any evidence base documents. - The Framework [§47] is clear that there is a need to boost significantly the supply of housing in order to deliver a wide choice of high quality homes and ensure that Local Plans meet the full and objectively assessed needs for market and affordable housing in the relevant housing market area. - West Lancashire should plan for a level of housing growth to support the economic aspirations of the Borough and align with the Borough's growth objectives. The Council should ensure that the relevant evidence base documents and studies have regard to each other, and that the objectively assessed need [OAN] for employment land is aligned with the OAN for housing in the Borough. - There are substantial negative economic and social implications of not providing sufficient housing to meet identified needs and demand. It is therefore crucial that enough housing land is allocated in the Local Plan for residential development throughout the Borough. Demand for housing land and</p>	Noted

demand for employment land are inherently linked, and provision of both should be well planned and promote sustainable travel. - The Practice Guidance requires that potential job growth is considered in the context of potential unsustainable commuting patterns and as such plan-makers should consider how the location of new housing could help address this. Ensuring a sufficient supply of homes within easy access of employment represents a central facet of any efficiently functioning economy and can help to minimise housing pressures and unsustainable levels of commuting (and therefore congestion and carbon emissions). If the objective of employment growth is to be realised then it will need to be supported by an adequate supply of suitable housing. - The OAN is the number of dwellings needed to provide the necessary development for the Borough to achieve its economic and social potential. If the Council is serious about the Borough achieving its social potential and having a thriving economy, a housing target higher than the OAN should be set in the Local Plan to provide enough flexibility and choice to help ensure that enough housing is delivered over the plan period. For example, if any allocated sites are not delivered over the plan period, this could jeopardise the Borough's ability to realise its Strategic Aims and Objectives and its Vision. - Taylor Wimpey objects to the approach taken in Options A and B. Option A seeks only to 'meet' the 2014-based Sub-National Population Projections (with relevant adjustments), only to 'meet' the need for general employment land and does not aim to meet any of the sub-regional need for large-scale logistics. Whilst Option B includes a higher housing figure (300 dpa) than Option A, it also does not aim to meet any of the sub-regional need for large-scale logistics. Without a review of the SHELMA it is not possible to fully determine how each option would integrate the housing and economic strategies for the area but in both cases the general approach would not seem to align with such strategies and would potentially therefore be contrary to the Framework [§158]. - Options C and D seek to deliver more housing land than is necessary in order to meet a wider sub-regional need. This general approach is welcomed and accords with the Councils overall approach to the DtC. Both options also include a 20% margin for flexibility which is also supported. The key difference in the approach set out in Options C and D is that Option C seeks to meet a 'small' proportion of the LCR demand for large-scale logistics but Option D seeks to meet a 'larger' proportion. Taylor Wimpey therefore supports the general approach of Options C and D. - The Practice Guidance is clear that local authorities should consider an increase in the total housing requirement in a Local Plan where it could help to deliver the required number of affordable homes and that this is in addition to an uplift related to the affordability ratio when taking into account market signals¹. In this context, whilst it is acknowledged that the SDO Paper states that Option E "provides an absolute maximum option in terms of what is potentially deliverable". The Council must consider increasing the overall housing requirement to help deliver the required affordable housing needs of the Borough. - In terms of the actual numbers involved (dpa) in each scenario, Taylor Wimpey is unable to comment fully at this stage and reserves the right to comment further at subsequent stages of the Local Plan process. For example, when the SHELMA is published and the full implications of growth (including logistics), affordable housing needs and any unmet development needs from neighbouring authorities are clearer. Without a full review of such evidence, it is difficult to make an informed judgement to determine whether Option A is "the very minimum level of new development that West Lancashire could be argued to need" [SDO Paper §3.2.3] or Option E "provides an absolute maximum option in terms of what is potentially deliverable" [SDO Paper §3.2.7]. - In summary, a housing target higher than the OAN should be set in the Local Plan to provide enough flexibility and choice to help ensure that enough housing is delivered over the plan period. The OAN for housing should be based on robust evidence and should align with the OAN for employment land for the Borough. Furthermore, the Council must consider meeting any unmet need from neighbouring authorities in the LCR as part of the overall housing

ID	Representor Comments	Council Response
	requirement.	
57	Whichever option is chosen, planning policy needs to meet the needs of present and future residents in the borough whilst retaining the essential character of the various communities within it. The function and extent of the Green Belt needs to be addressed as an integral part of this process.	Noted
58	<p>The choice of option will be heavily influenced by the outputs from the LCR SHELMA work. Unfortunately the draft LCR SHELMA was not published at the time of writing this response. The following response is, therefore, based solely upon the available information at the time of writing and may change once the draft LCR SHELMA is published. The following response is primarily focused upon the identified housing requirements within each option. - - The HBF would not support option A, this scenario would only meet the baseline demographic scenario identified within the 2017 West Lancashire Housing and Economic Development Needs Assessment (HEDNA). It does not take account of the need for a market signals adjustment, as required by the PPG (ID 2a-019) nor would it align with the economic and housing strategies of the area (PPG ID 2a-018) and as such would be contrary to the NPPF, paragraph 158. The HBF does not, therefore consider this option to be the minimum housing requirement figure as suggested by the options paper. - Option B identifies a need of 300 dwellings per annum. The options paper suggests that this is "...roughly based on the SHELMA's Economic Growth scenario for housing based on the anticipated job growth in West Lancashire...". Without full details of the SHELMA it is difficult to ascertain the extent this option integrates the housing and economic strategies for the area. It is, however, noted that it is above the economic growth scenario discussed within the HEDNA, table 45. The HBF does have concerns regarding some of the assumptions used within the HEDNA on issues such as economic activity rates and appropriate market signals uplift which may suppress this requirement figure. - - It is noted that option B takes no account of meeting any sub-regional need for land for large-scale logistics. This is likely not only to impact upon the employment land requirement but also the housing requirement. Given this omission it would appear from the information available that an uplift to the housing requirement identified in option B would be required to fully align economic and housing growth. - - Options C and D both refer to West Lancashire assisting to meet a proportion of the needs from other LCR authorities. These are valid options if such a request is made. It is, however, unclear at this stage if and how much housing would need to be accommodated within West Lancashire. It is therefore difficult to assess the appropriateness of the uplift identified in the two options. - - In reference to Option E the PPG is clear that an increase in the total housing included in a plan should be considered where it could help to deliver the required number of affordable homes (ID: 2a-029). This is a different uplift to that made for the affordability ratio identified under market signals (PPG ID 2a-019). The need to consider meeting the full affordable housing need was reinforced by Stewart J in <i>Satnam Millennium Ltd v Warrington Borough Council</i> (2015). Moreover in <i>Oadby and Wigston Borough Council v Secretary of State for Communities and Local Government and Bloor Homes Ltd</i> (2015), Hickinbotton J stated that a failure to respond to affordable housing need is a policy choice which means that the Councils should demonstrate that either affordable housing need is met or justify why it cannot be met. Therefore if the full need for affordable housing cannot be met, inclusive of other forms of delivery, the Council will need to justify its position. - - In summary, based upon the available information the HBF would recommend that the housing requirement is set in excess of option B. The amount above option B will be dependent upon the full implications of growth, including logistics, identified - through the LCR SHELMA, a need to consider how to address the affordable housing needs of the area and any unmet needs from neighbouring authorities. - -</p>	Noted
59	We do not argue with this approach but see earlier comments. - The five	Comments Noted

options listed at 3.2.1 do not necessarily cover the right choice. There is no good reason for assuming that the requirement for employment development land should be directly linked to housing development land, since the components of each category are different, with only some degree of overlap. For example, high density employment developments, such as are common in the cities, produce more jobs per hectare than will warehousing and logistics developments, whereas housing developments are largely averaged at around 30 to 40 per hectare. - - "1.1.8 As well as these "strategic" issues, and the options for addressing - them, the Local Plan must consider the issues that affect the - Borough as a "place" and that affect the people who live, work - and spend leisure time in West Lancashire. As such, there are a - series of Topic Papers sitting underneath this Paper that we invite - you to consider, especially if you have an interest in a particular topic - area." - - This is a fair statement. People want, or do not want, to live in particular areas according to their own particular circumstances or points of view. The problem appears to be that the Local Plan process makes everything else subservient to economic growth and never-ending releases of land. This approach can lead only to one outcome - one huge conurbation. This is not why people generally choose to live in West Lancashire. - - - "1.3.1 The National Planning Policy Framework (NPPF), and its - accompanying Planning Practice Guidance (PPG), provides the key - context for all planning matters in the Local Plan, with one of - the tests of soundness that the Local Plan will be examined on - being consistency [sic] with the NPPF. The golden thread running - through the NPPF is that of "sustainable development" and, in - particular, the presumption in favour of sustainable development. - This holistic emphasis on the economic, social and environmental - impact of development has to come through a Local Plan and the - Local Plan should fully meet an area's objectively-assessed need for - development unless there are over-riding adverse impacts of doing - so which would outweigh the benefits of doing so. - - 1.3.2 This then sets the tone for any new Local Plan, in that it must - be positively-prepared, seeking to promote any development that - is sustainable and, wherever possible, meeting more than the basic - development needs for an area; being creative in how those needs - are met to make better places for people to live, work and spend - their leisure time; and being viable and deliverable." - - If only this had been our experience of West Lancashire through several - versions of the Local Plan. - - - "1.3.4 Within the NPPF and the PPG, a wide range of planning matters are [is] - discussed and, where appropriate, the national policy on these - matters is drawn out in this Paper as we discuss certain issues, but - all must ultimately contribute to the aim of sustainable development - that fully meets development needs (including necessary - infrastructure)." - - Necessary infrastructure is the basic weakness in West Lancashire. Roads of all types have become poorly maintained and heavily loaded through a long period of housing and employment development. Rail services, other than to Liverpool from Ormskirk, have diminished and bus services have been largely wiped out. During this same period, the availability of services for rural areas, from re-cycling facilities to postal deliveries, post offices, local shops etc. has declined substantially; health and voluntary services have also declined. There is much improvement that needs to be made before the Borough can even start to move forward. - - - "• Economically, West Lancashire continues to gradually grow, [split infinitive!] - with steady growth in jobs in particular, and this growth is - anticipated to continue and possibly at a higher rate. However, - the local workforce will decline in number as the population ages - (and as working age people struggle to afford a house in West - Lancashire). - - • As such, the continued economic growth of West Lancashire - needs to be fuelled not just by providing land in the right location - for new employment premises to attract businesses (both large - and small, established and new), but by providing the right - supporting context to attract those businesses which includes - providing a skilled local workforce, appropriate housing provision - to accommodate employees and an attractive environment and - offer to retain and draw working age people to the area, especially - graduates." - - A skilled

ID	Representor Comments	Council Response
	<p>workforce should be attracted to skilled employment, where it exists. - - “• There is a significant opportunity to boost the local economy, - especially in the M58 corridor, as a result of the Liverpool2 - deep water terminal and expected surge in demand for logistics - facilities and ‘spin-off’ industries. Skelmersdale is likely to be - the most appropriate location for such opportunities given its - excellent road access from the Port of Liverpool.” - - The most appropriate location in what area? Why would importers or exporters want to do anything in West Lancashire, other than possibly to provide a stopover for HGVs travelling to Liverpool/Bootle. Does the Borough’s workforce need even more logistics work? - - “• There is significant leakage of expenditure from the Borough, - especially in relation to comparison (non-food) retail and - commercial leisure / entertainment and the night-time economy. - The Borough’s town centres in particular need to be managed - and developed appropriately to help them reinvent themselves - to meet 21st Century preferences for retailing, leisure and - entertainment.” - - But not to become no-go areas for ordinary people at night. Town centres should be places to live, as well as to shop and be entertained. - - “• The amount of best and most versatile agricultural land in the - Borough is a regionally important resource and is vital to the high - performing agricultural industry in West Lancashire.” - - Agreed but this demonstrates the need to protect this resource, not to develop it for huge housing and employment sites. - - “• Parts of West Lancashire are internationally important - designated nature reserves, accommodating significant - proportions of the world population of certain species. - These are both an asset to the Borough, requiring continued - protection, and also a potential constraint to development in - some areas.” - - Not all areas should be regarded as potential development areas. - - “• The impacts of climate change, particularly in relation to - flooding and drainage, must be managed appropriately including - considering how and where new development is built in West - Lancashire to ensure that new development does not make - existing issues worse.” - - The most pressing issue is the Environment Agency’s plan to stop maintaining pumping operations within the pumped drainage scheme. This needs to be resolved without further political manoeuvring.</p>	
60	<p>2.1 Five housing requirement options are set out, these being: - •A. Approximately 8 ha of land (for 200 dwellings) per year and 2 ha of employment land per year - •B. Approximately 12 ha of land (for 300 dwellings) per year and 3 ha of employment land per year - •C. Approximately 16 ha of land (for 400 dwellings) per year and 4 ha of employment land per year - •D. Approximately 20 ha of land (for 500 dwellings) per year and 5 ha of employment land per year - •E. Approximately 24 ha of land (for 600 dwellings) per year and 6 ha of employment land per year - 2.2 Paragraphs 3.2.2 to 3.2.12 provide a commentary from the Council’s perspective on each option as to the benefits and/or adverse impacts. At this stage in the process we note that West Lancashire is part of the wider Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA). That document has yet to be published although it will assess the housing and employment needs across the six authorities in the City Region of which West Lancashire is one. Therefore the implications of Duty to Co-operate will need to be considered going forward although the West Lancashire Housing and Economic Development Needs Assessment (HEDNA) and the LPR documents are clear that any impact of Duty to Cooperate would require an increase in the housing requirement for West Lancashire. Therefore the HEDNA should be seen as the minimum requirement going forward. - 2.3 The HEDA sets out the various components which would comprise the OAN for West Lancashire. The conclusion in Table 45 is: - - 2.4 The OAN is set out as 241 dwellings per annum. However we have the following reservations. - 2.5 Paragraph 9.31 summarises the affordable housing need in West Lancashire. It confirms that “this shows a need for 540 units per annum. At an affordable housing delivery rate of 30% this would require the delivery of 1,800 dwellings. The affordable housing needs</p>	Noted

evidence suggests that an uplift from the demographic need (based on the 2014-based Household Projections) would be justified in West Lancashire. The uplift then applied is 10%". - 2.65 Such an uplift only provides an additional 20 affordable homes per annum. If the 30% affordable housing percentage is applied to the Economic Baseline (221) that would provide 66 affordable homes, whereas with the OAN it would deliver 72 affordable homes. Therefore the uplift would provide an additional 6 affordable homes per annum which we consider is not a material change that makes any meaningful impact on the significant need. Therefore a greater uplift is required. - 2.7 Paragraph 9.39 of the HEDNA states: - "In considering the scale of adjustment, it should be borne in mind that in addition to the market signals uplift West Lancashire also sees an adjustment (22%) to support economic growth." - 2.8 Therefore the HEDNA has advised that there should be a 22% uplift for economic growth and a 10% uplift for affordable housing. This would be an uplift from the demographic starting point (200 dwellings). Applying such uplifts would require the OAN to be increased to 268 dwellings. This is calculated as follows: - • Demographic Based Need – 200; - • 22% economic growth uplift - 244; - • 10% affordability uplift – 268. - 2.9 Table 45 should be revised accordingly. - 2.10 We have significant reservations with the 10% affordability uplift for two main reasons. - 2.11 The first is as we explain in paragraph 2.7 above which is that a 20 dwelling uplift will not make any meaningful contribution to the severe affordable housing crisis in West Lancashire. - 2.12 The second is for market signals. The HEDNA includes market signals along with affordable housing need in one uplift of 10%. This is clearly not appropriate and there should be two separate uplifts. Affordability is clearly a significant issue which is not improving in West Lancashire. Indeed paragraph 12.23 of the HEDNA sets out the key market signals, the two key ones being: - • The lower quartile affordability ratio (house price to income ratio) is 6.9 in West Lancashire – the highest of the LCR authorities. - • House price growth in West Lancashire has exceeded the regional average in the longer-term. - 2.13 This is evidenced in the following tables in the HEDNA. - - 2.14 West Lancashire is clearly the most expensive area to live in the Merseyside region by a significant margin. - 2.15 Figure 32 shows the lower quartile affordability ratio and paragraph 9.17 states that meaning lower quartile house prices are 6.9 times higher than lower quartile annual earnings in West Lancashire which is the highest ratio of the City Region authorities. - - 2.16 There are clearly significant affordability issues and West Lancashire is rightly seen as a location that people wish to live. The adopted local plan has failed to address affordability and the delivery of much needed affordable homes in West Lancashire. This is encapsulated in paragraph 2.7 of the Social Policy Issue Paper which states: - "2.7 Housing affordability is a longstanding issue, not just in West Lancashire but nationwide. Not only are house prices high and rising but (owing to changes in national policy, the weight given to viability matters, and macro-economic issues such as austerity, recession and Brexit) the Council's ability to procure affordable housing, either from 100% affordable schemes, or in conjunction with market housing developments, has been significantly curtailed. Thus the Council are operating in a difficult environment as far as facilitating or delivering affordable housing is concerned and, as a consequence, in recent years the delivery of affordable housing in West Lancashire has been below the annual need." - 2.17 The LPR is the opportunity to do address this issue and the only realistic way of improving affordability is to increase the supply of housing significantly beyond the OAN. This can be undertaken through Duty to Co-operate or an increased uplift for a greater number of affordable homes and also for market signals. West Lancashire is part of the wider Merseyside housing market area and has strong interrelationships so can provide a sustainable location to meet needs arising from Duty to Cooperate. - 2.18 Additional factors which will impact on the OAN and which are not assessed or publicly available as yet are as follows: - • The Merseyside SHELMA; - • An updated SHMA as the last was undertaken in 2009 as set out in Table 2.8; - • The implications of Duty to Cooperate; and - • Further increased need

ID	Representor Comments	Council Response
	<p>for B8 employment in the Merseyside Region. This is important for West Lancashire due to the M58 and its links to the Merseyside to the west and the M6 to the east. - 2.19 The conclusion to draw at this early stage is that Option C is the minimum requirement that should be advanced. This accords with the conclusion in 3.2.9 of the consultation document which states that Options A and B “are lower than those in the current Local Plan and what would typically be expected in West Lancashire and so could stymie economic development in West Lancashire and have a detrimental social impact as a result”. - 2.20 Options C to E are also identified in the consultation document as bringing “economic and social benefits to West Lancashire and facilitate the improvement and renewal of towns such as Skelmersdale, with the growth potentially attracting funding to improve infrastructure in the Borough, all of which, if planned properly, can narrow the inequality gaps that exist between different parts of the Borough”. - 2.21 The LPR should proceed on the basis of Option C as the minimum but whether Options C, D or E are eventually chosen will be determined as the evidence base and Duty to Cooperate discussion are held.</p>	
61	<p>Option B I think is most appropriate because it is based on the SHELMA's Economic Growth scenario for housing. Option C meets the need for co-operation with neighbouring Councils but if a region the size of Liverpool City can't meet its housing needs then it is unrealistic to expect West Lancashire to be able to meet its own needs and be able to provide an additional 100 dwellings a year. This option and options D & E would result in an over development of West Lancashire. - The Social Policy Options document (2.1) states ' the population in West Lancashire is expected to increase from 111,900 in 2016 to 116,200 in 2037 representing an increase of 3.8% or an additional 4,300 residents on 2014 levels'. It is difficult therefore to see how any more dwellings than Option B, which will provide 7500 dwellings in the same period, can be justified in the next local plan based on forecast demand.</p>	Noted
62	<p>The Strategic Development Options Paper identifies five “Strategic Development Options” for the amount of new housing and employment development: - a) Approximately 8 ha of land (for 200 dwellings) per year and 2 ha of employment land per year; - b) Approximately 12 ha of land (for 300 dwellings) per year and 3 ha of employment land per year; - c) Approximately 16 ha of land (for 400 dwellings) per year and 4 ha of employment land per year; - d) Approximately 20 ha of land (for 500 dwellings) per year and 5 ha of employment land per year; and, - e) Approximately 24 ha of land (for 600 dwellings) per year and 6 ha of employment land per year. - It is considered that Option E is the most appropriate growth option for the borough. Whilst, Option E is supported in principle, it is acknowledged that further evidence based work to support these growth scenarios is required. For example, any development and land requirements arising from need from the wider Liverpool City Region are at this stage unclear. - Notwithstanding the above, it is noted that the adopted Local Plan (2012-2027) sets out a minimum - requirement for 4,860 dwellings and 75ha of employment land over the plan period. This equates to a minimum average requirement of 324 dwellings per annum and 5ha of employment land per annum. On this basis alone it would be appear that Options A-B are far too conservative and should be discounted. Indeed Options A and B could hinder the economic growth in the borough and have a detrimental social impact as a result. Further details are set out below: - The Council acknowledge that Option E reflects a scenario where the Local Plan seeks to meet close to the full affordable housing need for West Lancashire. Consequently, there is a greater requirement for employment land in the borough to support the additional housing requirement as well as accommodating a larger proportion of the Liverpool City Region demand for large-scale logistics. Option E is therefore supported as it represents an ambitious pro-growth scenario in line with the recommendations of the National Planning Policy Framework (NPPF). Indeed paragraph 14 of the NPPF states that: - “Local planning authorities</p>	Noted

ID	Representor Comments	Council Response
	<p>should positively seek opportunities to meet the development needs of - their area; - Local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid - change.” - Paragraph 17 states the following in relation to the planning system: - “proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities”. - It is considered that due to the emerging analysis of development needs for West Lancashire in the draft report of the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA), the Council should look towards a pro-growth option. - Option C indicates that West Lancashire would have to meet an unmet housing need from the Liverpool City Region or other surrounding Authorities and represents be a more appropriate and considered approach. - Further consideration should be given to the opportunity to meet large-scale logistics which will seek to grow West Lancashire economically whilst meeting a wider sub-regional need. - As such, the Council should look towards providing 600 dwellings per annum 6 ha of employment land per annum (Option E). We consider it vital that the Borough enables itself to grow economically and that the necessary housing and associated infrastructure is provided alongside the delivery of increased employment land. Notwithstanding this, we do acknowledge that there are a number of factors to consider including the environmental impact of developing the land required, however, this needs to be balanced against the benefits which would be provided by creating more jobs and providing much needed housing in the area. - Whilst Option E would clearly require Green Belt release, it is considered that any environmental impacts could be mitigated against, particularly when identifying sustainable growth locations on the edge of the larger settlements in the Borough such as Skelmersdale with Upholland and Ormskirk with Aughton. - It is therefore considered essential that the Council undertake a Green Belt review as Green Belt boundaries around the key settlements in the Borough will prevent the Council meeting its development targets in the most appropriate locations. The Council will not be able to deliver significant quantum’s of growth without the release of Green Belt land.</p>	
64	<p>Our Clients support a pro-growth approach for West Lancashire, to ensure it is aspirational and meets the full, objectively assessed needs of the Borough over the Plan Period. Paragraph 47 of the NPPF is clear - local planning authorities are required to “boost significantly the supply of housing” and in doing so, must ensure that the Local Plan meets the “full objectively assessed needs for market and affordable housing in the housing market area”. - At this stage, we have not undertaken a detailed examination of the Council’s Housing and Economic Development Needs Assessment (“HEDNA”) in relation to the full Objectively Assessed Needs (“OAN”) however it is noted that there is an identified required to apply an uplift to the Borough’s housing need figure to support economic growth and meet affordable housing provision. The HEDNA does however only cover the period 2012 – 2037. If the Plan period is to be extended, which our Clients support, a commitment to reviewing the OAN during the Plan period up to 2050 will be required because household projections for this time are unknown. - The Council’s current Local Plan requirement is 324 dpa. It is our Clients’ position that to meet the aspirational needs of the Borough and to address affordable housing shortfall, at the very minimum there is a requirement to deliver a higher housing figure (minimum of 400 – 500 dwellings and 4/5 ha of employment land per annum. This is to ensure that the emerging Local Plan achieves an ambitious pro-growth target that</p>	Noted

ID	Representor Comments	Council Response
	<p>West Lancashire should seek to deliver. To facilitate this Green Belt release will be required to meet these needs, because if not the Plan will be constrained. - A lower requirement will not take account of market signals adjustment, as required by the PPG or align with the economic and housing strategies for the area, and will fail to take account of a sub-regional need for land for large scale logistics, which will impact on both housing and employment land requirements. - - The housing requirement from the Liverpool City Region SHELMA are unavailable at this time, and our Clients support the Council's commitment for the housing requirement to be revised when the SHELMA from the Liverpool City Region is published. This is because of the overlap between the Housing Market Area of Central LCR and Mid Mersey HMA, which will affect the housing and employment requirements within West Lancashire. If any departure from the Liverpool City Region SHELMA is proposed, necessary justification must be provided to ensure that the Council is able to demonstrate that the emerging Local Plan housing requirement is appropriately justified. - - It is our Clients' consideration that a suitable buffer should be applied to the housing requirement, to ensure that a sufficient supply of housing is provided, in accordance with Paragraph 47 of the NPPF. This will ensure there is flexibility, choice and competition within the housing market, and provide greater opportunities for housing need to be met in full, and ensure the Local Plan is consistent with the NPPF. - - Policies should be sufficiently flexible and provide a positive framework to assist housing delivery and avoid unnecessary restrictive policies.</p>	
66	<p>Housing Target - In selecting a housing target, the Council should seek to meet full objectively assessed housing needs for market and affordable housing. In addition, the strategy should also seek to effectively coordinate with relevant neighbouring authorities on how they might help to assist in cross boundary strategic issues, such as unmet housing needs. - - From the options put forward for consultation, Gladman would be supportive of the selection of the - upper end of the housing figures considered (option E). The selection of a lower figure would not reflect the Frameworks requirement to set a positive vision for the future area, meeting full OAN for housing in the HMA and proactively encourage sustainable economic growth and regeneration. - The selection of Option E as a housing target represents a more positive approach to future growth in accordance with the requirements of national policy and the need to significantly boost the supply of housing and meeting full OAN. This should however not be seen as a maximum but rather the minimum amount of housing that the Plan should seek to meet.</p>	Noted
67	<p>Options A-B would do nothing to boost significantly the delivery of homes and would perpetuate the recent historic situation of under-supply. - - Options C- E must be considered to enable the development and growth requirements of the Borough to be accommodated, and to address issues of affordability. - - see attached comprehensive submissions -</p>	Noted
69	<p>It is almost impossible for the lay person to comment on specific figures, but the key factors are: - the amount of previously allocated, as yet unused, development land; - the exceptionally high quality of agricultural land throughout West Lancashire, which if developed to any extent will not be able to be restored to its former value or use. Many experts consider that we will need to supply more of our food locally in the future. - Option A - the lowest - appears the most sustainable, and even this may be more than is necessary in any given year. I fail to see that an identical amount for every year is essential or appropriate.</p>	Noted
70	<p>The Issues and Options paper presents a number of different scenarios with a number of - growth options which could feed into the Local Plan Review. These have been informed by the - Liverpool City Region SHELMA. - - The Commissioners note that the rationale for the Local Plan Review is to ensure that future - needs for housing are met and that opportunities for</p>	Noted

ID	Representor Comments	Council Response
	<p>growth are maximised. As a result of this - we would expect the Council to seek a figure which is aspirational in nature and which goes - over and above the Objectively Assessed Need (“OAN”) for future housing growth over the - plan period. We note the OAN in the SHELMA is around 200 dwellings per annum whilst the - more recent HEDNA defines the OAN as 241 dwellings per annum. - - As outlined above, we also believe that as West Lancashire sits in a position between large - urban areas and has linkages with a number of City Regions, there will be a requirement for - the Borough to accommodate growth from neighbouring authorities which may not have the - capacity to accommodate all their housing requirements. This would point to the most - appropriate strategy to be either Option D or E (500 – 600 dwellings per annum). These - options would also mean that the strategy in the Local Plan Review is sound on the basis of - being positively prepared. - - We note that the difference between Option D and E is the degree to which affordable housing - is addressed. This is clearly an important objective of the Local Plan Review. It is noted that - the National Planning Policy Guidance (“NPPG”) states that: - “An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.” (Reference ID: 2a-029-20140306) - - In this instance an uplift in overall housing numbers to support affordable housing provision - is justified and therefore out of the options presented within this paper, the Commissioners - Favour Option E (600 dwellings per annum). In endorsing this approach, we recognise the - challenge there will be to accommodate such growth but a positively planned framework of - policies and appropriate allocations should ensure such growth can be achieved and the issues - identified can be addressed. - - This amount of new development, which we believe will be necessary, will require the release - of Green Belt land. We note that the Council undertook a Green Belt Study in 2011 (plus an - addendum in 2012). However, this appears to be a selective/partial review of Green Belt land - (missing what we believe to be key parcels of land owned by the Commissioners) and we - would strongly object to some of the conclusions drawn in relation to the Commissioners’ land - and how they have been assessed. As such we believe that a revised Green Belt Study should - be undertaken to support the Local Plan Review and the Commissioners should be afforded - the opportunity to submit its own evidence and assessments in respect of Green Belt matters - relating to the relevant landholdings.</p>	
71	<p>Sefton Council is a statutory consultee to the West Lancashire Local Plan. The current West Lancashire Local Plan was adopted in October 2013. However, as a result of the changing national planning policy context and a desire to ensure that policies in the Plan are not considered to be out-of-date, the Council has resolved to begin the preparation of a new Local Plan. The current consultation is the first stage in that process. Sefton has recently received its Inspector’s report, following the examination of its Local Plan. Of relevance is paragraph 16, which states “... the examination has identified tensions relating to Southport’s development needs which may have cross-boundary implications going forward.....The tightly drawn administrative boundary with WLBC has made it difficult to meet the town’s housing and employment needs close to where they arise. WLBC advised Sefton that it was unable to accommodate any of Sefton’s needs within its area and, importantly, the West Lancashire Local Plan was found sound after the duty to co-operate was introduced. So, while there has been compliance with the duty in the current round of plan preparation, there may be a need for more positive engagement on this cross-boundary issue in the future. One of the key tests in determining whether the Local Plan is sound is whether the Duty to Cooperate has been met. Therefore, in order for West Lancashire to be able to demonstrate that this Duty has been met it needs to show that it has considered Southport’s future housing and employment needs that may arise in the future.4. The Options West Lancashire is consulting on 3 variables – the amount of development; how long the Plan period should be, and how the</p>	<p>Noted. The Council will continue to liaise with Sefton Council and other neighbouring authorities as it prepares the Local Plan Review and in so doing fulfil the Duty to Co-operate and the requirements of the NPPF in relation to consideration of strategic, cross-boundary matters, including housing need.</p>

development is distributed around West Lancashire. Two plan periods are being considered. The first would run from 2012 – 2037, which would provide a post-adoption plan period of 15 years and aligns with the forecasts in the SHELMA. The longer period would run from 2012 – 2050. This will allow West Lancashire to plan its future in a coordinated way and to release sufficient land from the Green Belt to meet longer term development needs, consistent with NPPF policy relating to the revision of Green Belt boundaries. The 5 options, based on the findings of the draft SHELMA with regard to the Objectively Assessed Needs for West Lancashire, are:

- A. Approximately 8 ha of land (for 200 dwellings) per year and 2 ha of employment land per year
- B. Approximately 12 ha of land (for 300 dwellings) per year and 3 ha of employment land per year
- C. Approximately 16 ha of land (for 400 dwellings) per year and 4 ha of employment land per year
- D. Approximately 20 ha of land (for 500 dwellings) per year and 5 ha of employment land per year
- E. Approximately 24 ha of land (for 600 dwellings) per year and 6 ha of employment land per year

The supporting text indicates that under Option C, West Lancashire would be able to meet an unmet housing need from the Liverpool City Region or other surrounding authorities for 100 extra dwellings a year. Finally, 4 development scenarios are put forward for comment:

- Scenario 1: the existing pattern of household and employment land distribution
- Scenario 2: a focus on the key service centres
- Scenario 3: a focus on rural communities
- Scenario 4: a focus on growing Skelmersdale in particular.

The supporting text indicates that Scenario 3, which sees more development in the Northern and Western Parishes (i.e. the areas closest to Southport), would be appropriate if it was decided these areas needed to grow in order to make them more sustainable and to reduce the burden on the main urban areas if the latter were constrained in a significant way. Significant investment in new infrastructure would be required to support this scenario. This scenario could include the creation of a new village or significantly expanding an existing village to meet this need. If the urban extension / new settlement were to be located adjacent to Skelmersdale, where it would support the Skelmersdale rail link and relieve congestion in other parts of the Borough, this would not meet Southport's future needs. However, it is acknowledged that the creation of a new village or the expansion of an existing village in the Western Parishes or at Banks would be likely to run into similar issues relating to flood risk, development costs associated with peat, and ecology as are to be found in eastern Southport, so could be difficult to achieve.

5. Implications for Sefton

It is difficult to see how West Lancashire can plan to 2050 when most existing forecasting only covers the period to around 2037 (i.e. the SHELMA). Furthermore, the longer the Plan period, the more variations in the economic cycle there are likely to be, so this makes planning for such a long time extremely challenging. At present the Local Plan does not indicate that there is any need for any further residential or employment development in Sefton to meet its needs, but this could change as updated population and household projections are prepared by the CLG. It is therefore not possible to identify any future needs that Sefton would wish West Lancashire to meet in the future. The SHELMA identifies a need for at least 300ha of land suitable for large scale B8 logistics development across the Liverpool City Region. Sefton agrees that some of this need could be met in West Lancashire, along the M58 corridor. However, whether this is an appropriate location for this should be identified by a Liverpool City Region-wide study and potentially through a City Region's Spatial Framework. It is still early on in the consultation period and further discussions will take place between West Lancashire and Sefton during the consultation period to confirm how the West Lancashire Local Plan will consider Sefton's concerns. It does not have to agree to meet them, but, for the Duty to Cooperate to be met, it does need to consider them. In addition to meeting any long term housing and employment need that Sefton is unable to meet within its own boundaries, and where this should be located. Development close to Skelmersdale would not meet this need, so the possibility of creating a new village or

ID	Representor Comments	Council Response
	<p>expanding Banks or a village in the Western Parishes, must be fully investigated as any unmet provision that is met in West Lancashire should be located as close as possible to Southport. The West Lancashire Local Plan review needs to consider how infrastructure needs relating to any future expansion of Southport are met and how development located in Southport's hinterland, albeit in the West Lancashire administrative area, can contribute towards the costs of providing new and enhances infrastructure such as increasing school capacity. It needs to consider the transport infrastructure requirements of new development close to the Sefton boundary and how Southport can be better served and linked to the national road and rail networks in the future. This should include the reinstatement of the Burscough Curves, which is included in the Liverpool City Region Long Term Rail Strategy. Finally, it also needs to consider the impact that future development in West Lancashire will have on the highways network in Sefton, such as the A59 and Switch Island, which are already at or close to capacity, and provide one of the key road connections from Ormskirk, Burscough and the Northern Parishes to Liverpool.</p>	
72	600 plus houses per annum where demand will support take up.	Noted
73	<p>It is noted that WLBC is seeking views on five different options for the amount of - development land required per year. However, at this stage, it is not possible for the - University to comment in detail on which of these options is the most appropriate for the - Borough, as the supporting evidence base documents – particularly in respect of the full - development need implications arising from wider Liverpool City Region – have not yet - been made available for review. - - However, the provision of a wide range of housing has a significant role to play in terms - of attracting staff to work at the University and to retaining graduates in the borough. As - such, it is vital that sufficient housing growth is secured to support the University's - aspirations for growth over the plan period.</p>	Noted
74	<p>The option chosen should be based on meeting the OAN as a minimum and ongoing negotiations through the Duty to Cooperate to accommodate unmet need in neighbouring authorities. - The nature of affordable housing need in the Borough can be met through providing additional housing beyond the OAN, which can serve to meet direct defined affordable housing and increase the housing offer in terms of market housing by providing modern energy efficient new dwellings of sizes to meet need and latent demand. This in itself can have a positive impact on social and economic aspects and environmentally through good design. - In this respect, the plan needs to attract house builders to the Borough by providing suitable and readily deliverable sites and not hindering development on sites close to existing settlements that already benefit from good access or local services and facilities. - Options C-E would provide sufficient scope for these additional benefits to be delivered through the provision of good quality housing.</p>	Noted
76	<p>If the Council want to achieve the vision as set out in the Strategic Development Options Paper housing and economic development Options A and B are not considered to be sufficient. This is accepted by the Council in paragraph 3.2.9 in the Strategic Development Options Paper which states that: - 'the requirements are lower than those in the current Local Plan and what would be expected in West Lancashire and so could stymie economic development in West Lancashire and have a detrimental social impact as a result'. - In order to achieve the vision as set out in the Spatial Development Options Paper, and be in accordance with the NPPF in respect of planning positively for the development needs and infrastructure of the area for the plan - period a higher growth option should be implemented over the emerging plan period.</p>	Noted
79	<p>Story Homes' appointed economic development consultant, Regeneris, have prepared a - Review of West Lancashire Housing Requirement Evidence, which is included at Appendix 2 - and provides a detailed</p>	Noted

response to the amount of development land required to be allocated by - West Lancashire in the Local Plan Review. - - Regeneris agree with the Council that the following are the key issues pertinent to the Local - Plan Review: - Achieving the job growth potential of West Lancashire, particularly through growth in the - logistics sector and through clawing back lost retail and leisure spend. - A significantly declining working age population, with a pressing need to create the - conditions (i.e. housing and infrastructure) to attract new working age families to the - Borough. - Worsening house price affordability ratios. - Regeneris consider that there are significant flaws in the GL Hearn West Lancashire Housing - and Economic Development Needs Assessment (HEDNA) and have highlighted the four main - criticisms in their report: - The HEDNA underplays the economic potential of West Lancashire. GL Hearn model two - economic scenarios. First, the Baseline Scenario is actually below the long term average - employment growth rate for West Lancashire. Second, the Growth Scenario represents a - tiny uplift on the Baseline Scenario and channels only 1% of additional employment - growth in the wider Liverpool City Region into West Lancashire. - The HEDNA contains flawed economic participation assumptions. Regeneris consider - that the idea that West Lancashire can connect a working age population loss of 6,000 - with an economic jobs gain of 6,000 via the addition of 21 dwellings per annum is deeply - flawed. This connection is only achieved via GL Hearn's unrealistic assumptions about - economic rising participation rates of existing residents, particularly older residents. - The HEDNA fails to apply a market signals uplift. GL Hearn conclude that a 10% market - signals uplift is required but then do not apply it and argue it is subsumed within their - economic uplift. The market signals adjustment is designed to provide additional housing for the existing population and help ensure, via a house price adjustment effect, that - those households that have not been able to form historically due to affordability - constraints can do so in the future. It is entirely appropriate and necessary to add the - market signals uplift to the economic uplift. - The HEDNA fails to adjust for affordable need. Regeneris advise that evidence in the - most recent estimate of affordable housing need for West Lancashire suggests a - substantial affordable housing need of 540 affordable dwellings per annum. Despite this - evidence, GL Hearn have made no upward adjustment to the Objectively Assessed Need - (OAN) to help boost the delivery of affordable units. An OAN set in the region of 240 - dwellings per annum, as prescribed by GL Hearn, will do little to deliver the required - amount of affordable housing. - Story Homes urge the Council to consider the criticisms set out in the Regeneris report to better - understand the true OAN for West Lancashire. Regeneris consider that the above factors would - yield an OAN in the region of 350 to 400 dwellings per annum for West Lancashire. This would - suggest a housing requirement of close to Option C (400 dwellings per annum) to meet West - Lancashire's development needs. Should West Lancashire agree to meet unmet need from - adjoining authorities, as suggested in the Strategic Development Options Paper, the housing - requirement will be higher. The Council's suggestion that it may deliver between 100 and 200 - dwellings per annum on behalf of adjoining authorities would also need to be added to the OAN. - Notwithstanding any housing need which may be required to be delivered within West - Lancashire to meet the need from other Authorities in the HMA, the Council should be seeking - to ensure, through this Issues and Options Consultation, that the Local Plan Review will boost - significantly the supply of housing by planning for economic growth and an uplift in OAN. - Story Homes reserves the right to make further comments on the soundness, or otherwise, of - the Council's approach to OAN once the approach within the Housing Market Area (HMA) has - been confirmed and agreed by the participating Authorities. It will only be at this time, from a - review of all the available evidence, that Story Homes will be able to provide a fully evidenced - opinion on the OAN required to meet West Lancashire's housing needs.

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81	<p>E - Approximately 24ha of land (for 600 dwellings) and 6 ha of employment land - - It is widely acknowledged, as advocated by the Government within the NPPF, that in plan making, Local Planning Authorities should: - - Positively seek opportunities to meet the development needs of their area; - -local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change - - Taking into consideration para's 150 - 156 of the NPPF, paragraph 157 states that Local Plan should be drawn up over an appropriate time scale, preferably 15 years, take account of longer term requirements and be kept up to date. - - On the basis that the potential is for the Local Plan to be in excess of 15 years, the LPA should not just plan to meet their five year housing supply, but for the lifetime of the Local Plan and the longer term. If the LPA genuinely has a Vision for this Borough, in terms of employment then it should, be implication seek to deliver the highest amount of development for both housing and employment. - - Critically, any assessment on housing and employment need should take into consideration the existing unmet needs for both housing and employment that are contained within the Adopted Local Plan 2012-2027, so a carry over is required to ensure this unmet need is also addressed and not excluded from the SHELMA. - - NB. It should be noted that these comments are submitted on the assumption that 600 dwellings per year and 6ha of employment land are the maximum housing and employment need for the Borough taking into consideration their Duty to Co Operate. We reserve the right to comment further once detailed information is produced in future consultation process.</p>	Noted
84	<p>Persimmon Homes feel that the draft vision and objectives as set out in the Issues & Options - paper are positively prepared and drafted and reflect the aspirations for future housing and economic growth. It is important that these social, economic and environmental settings are - considered throughout the development of the Local Plan review as it moves through the - Preferred Options stage to adoption. - - As a volume house builder, Persimmons comments at this stage are generally focussed on the - housing element of the requirement. - This work is the most immediately reliant on the ongoing work of the Liverpool City Region - SHELMA work. Given that this work has not yet been released we are unable to make a complete - judgement on the options and their corresponding impact in meeting, or otherwise, the currently - unconfirmed housing requirement. - This not withstanding we would like to provide the following comments. - Option A - This Option will only meet the baseline demographic scenario identified in the evidence base - (West Lancashire Housing and Economic Development Needs Assessment). There is no - consideration for the economic and housing strategies of the Local Authority or sub regional city - region. As such this is not considered to be compliant with National Planning Policy Framework - and accompanying guidance. Persimmon Homes would not therefore, support Option A. - - Option B - This option considers the Economic Growth Scenario of West Lancashire as set out in the SHELMA - (this cannot at this time to be verified), but not any further sub-regional need, particularly in - relation to logistics. The more precise meaning of 'roughly based' in relation to its relationship - with the SHELMA needs to be clarified. Persimmon Homes do not consider that this option - therefore fully considers the economic and housing growth aspirations and should not be - supported. - - Option C - Option C uplifts the housing and economic requirements in line with requirements (as yet known} - to meet needs from other Liverpool City Region authorities. Due to the currently unknown need - identified across the City Region, or the other authorities I markets abilities to meet their needs, it - is not appropriate to assess the level of uplift required at this stage. - - Option D - The same position as option C applies to this option which just proposes a greater level of uplift - due to a potential greater level of needs required to be met from elsewhere in the City Region. He - requisite level of uplift cannot be commented on without seeing the relevant documentation and - evidence from the City Region. - - Option E - Option E allows for meeting the affordable housing</p>	Noted

ID	Representor Comments	Council Response
	<p>need in West Lancashire. This would result in a - significant uplift over current and recent housing delivery rates. However, national policy and - guidance is clear in its direction that housing uplift should be considered where this would help to - deliver the identified requirement of affordable housing (ID:2a-029). There are also a number of - examples in recent legal decisions demonstrating the need to justify a deviation from this - approach. - West Lancashire should therefore provide justification for moving away from this option, even if it - is in part.</p>	
87	<p>Burscough does not need, and cannot cope with further allocations of housing. Roads and drainage are seriously under capacity. Where homeowners travel south to work (presently estimated at 60%) a greater strain is placed on the A59 and Ormskirk. This makes no sense. Roads to Scarisbrick and to Newburgh/Skelmersdale are country lanes taking far more and larger traffic than they were designed for. West Lancs should take the minimum number of houses that it is allowed to do. Those houses should be close to the motorway network where they will not increase pressure on overcrowded roads. This is Option A on page 14.</p> <p>The NPPF and its Golden thread running through it with the presumption in favour of “sustainable development”, this does need to be considered as there have been criticism of how it is being interpreted leading to failures, as highlighted below. The following points are extracts from a Government Select Committee in 2015</p> <ul style="list-style-type: none"> - The concept of sustainable development is at the heart of the NPPF, which included as its “golden thread” a new concept of a presumption in favour of sustainable development, which includes provision that development proposals in accordance with the local plan should be approved. We have been told, however, that, far from delivering development that is sustainable, the NPPF is, in fact, leading to unsustainable development. People variously said that sustainable development was ill-defined in the NPPF, that decision-makers were giving greater weight to economic over environmental or social considerations, and that sustainable development was not being delivered in respect of infrastructure, renewable energy and the natural environment. We consider all these issues in Chapter 2. In our view, however, they are not so serious as to require the tearing up of the NPPF but they deliver a strong case for making it operate as it was originally intended to do. The NPPF is clear that development should be sustainable; withdrawing the NPPF would serve only to take the principle of sustainable development out of the planning system. Rather, what we need to do is ensure sustainable development is being delivered in practice. In the following chapters, we will consider how to untie some of the tangles in the NPPF’s golden thread to ensure it leads to the delivery of development that is demonstrably sustainable. - A particular concern about unsustainable development was that planning permission was being given to substantial housing development on the edge of towns and villages, as a result of ‘speculative’ applications by developers. These applications used the provisions in the NPPF to target sites that had not been allocated for development or were unlikely to be allocated. It appeared that these developers were taking advantage of the absence of the local plan and five year supply of housing land to seek planning permission, often on <p>Four Marks Parish Council from Hampshire, for instance, said that the parish was “basically ‘under siege’” because of an “‘open season’ attitude for developers” -</p> <p>(https://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf)</p> <p>From the above comments you can see the Burscough and other parts of West Lancs have been under siege due to the attitude of developers. Planners also need to understand the issues affecting the environment and communities and importantly maintain an ethic of impartiality in making decisions. The environment is unable to speak for itself and therefore it is</p>	Noted

ID	Representor Comments	Council Response
	<p>important for planners to take account of issues, as regards the Burscough community many residents don't believe that WLBC take sufficient account of the environment and local communities with this having been demonstrated on a number of occasions with criticism still existing. At the forefront of criticism of NPPF is the presumption "in favour of sustainable development policy" as this can be crucial catalyst in focusing much needed developments when they potentially are a detriment to the environment and local communities. The Government has set great store in the brevity and simplicity of the NPPF, this does not achieve the clarity required therefore presenting gaps in Planning Policy. It is this point with ambiguity in the policy and the number of clauses it is easy for two people to have a different understanding.</p> <p>In a report from Government Select Communities and Local Government Committee they have offered comments to the Government on the NPPF. They recommend strengthening the planning framework to tackle emerging concerns about inappropriate and unsustainable development. Stating the same weight needs to be given to environmental and social factors as to economic dimension to ensure the planning system delivers the sustainable development promised by the NPPF. They found that developers were taking advantage of loopholes in the framework to launch speculative planning applications leading to unwanted developments contrary to the wishes of local communities - The Government Committee recommend the following on Sustainable development - "We recommend that the Government take appropriate steps to impress publicly upon both the Planning Inspectorate and local authorities the importance of giving equal weight to each of the three dimensions of sustainable development, as required by the NPPF. Both the Planning Inspectorate and local authorities, when they make their decisions on planning applications, should set out clearly how all three factors have been considered as part of the decision-making process."</p> <p>BPC should support 1.3.2 provided they include all the above points about improving Sustainable developments and removing Speculative development opportunities.</p> <p>On the impact of climate change to flooding and drainage, not only must it be managed appropriately, to ensure it is fit for purpose and does not make current situations worse, there has to be clarity, openness and transparency at every stage. All meetings at every stage must meet this criteria with minutes/notes available for all meeting.</p> <p>Something needs to be done regarding a massive improvement on Public transport for Burscough with more regular service during the day and a service in the evenings and Sundays.</p> <p>Objectives 2.2 should be fully supported and make sure no part of West Lancs is not left out, it is not just about a few places but all places. This issue is again crucial and must not be just talk, it has to be investment in the right projects in the right places.</p>	
89	<p>Section 3.1 focuses on the Development Options for the Borough. These 5 options are based around the following three variables: - 1. "The amount of development land required for housing and employment uses per year - 2. How far into the future the Local Plan is to look (the Local Plan period) - 3. The way the total amount of development land required throughout the Local Plan period is spread across the Borough." - The options provided within section 3 are as follows: - A. "Approximately 8ha of land (for 200 dwellings) per year and 2ha of employment land per year - B. Approximately 12ha of land (for 300 dwellings) per year and 3ha of employment land per year - C. Approximately 16ha of land (for 400 dwellings) per year and 4ha of employment land per year - D. Approximately 20ha of land (for 500 dwellings) per year and 5ha of employment land per year - E. Approximately 24ha of land (for 600 dwellings) and 6ha of employment land per year." - It is identified within paragraph 3.2.2 of the options paper that the strategic options have been identified through the SHELMA document. - Option A is the very minimum level of new development that West Lancashire could be argued to need.</p>	Noted

This Option is not supported by our Client as it does not provide for growth and only seeks to provide the minimum level of development. This therefore does not accord with the requirement for positively prepared plans within Paragraph 182 of the Framework. - Option B sees an uplift for development needs compared to the very minimum for Option A, reflecting a housing scenario that incorporates forecast job growth and an employment land figure that takes account of past trends. This option is not supported by our Client as it does not provide any support to the sub-regional area and is actually lower than the existing Plan target. Housing will need to be provided within the wider sub-regional areas, including WLBC, to provide housing to meet a range of needs. West Lancashire is a sustainable location for economic and housing growth. - The concerns raised by ourselves in relation to Options A and B are also recognised by the Council within paragraph 3.2.9: - "For example, Options A and B would clearly have the least environmental impact and, depending on how the housing and employment land requirements were divided up between the different parts of the Borough and, depending on how the housing and employment land requirements were divided up between the different parts of the Borough and depending on the length of the Local plan period, may not require additional green Belt release (although they would require development of greenfield land that is in the current Local Plan either as an existing allocation or as safeguarded land). However, while these options are based on potential scenarios for development needs, the requirements are lower than those in the current Local Plan and what could typically be expected in West Lancashire and so could stymie economic development in West Lancashire and have a detrimental social impact as a result" - Our Client fully agrees with the risks identified in paragraph 3.2.9 and on this basis recommends that neither of these development options are selected. - Option C is an above-OAN option that it could be argued seeks to deliver more housing and employment land than is strictly necessary in West Lancashire to meet the wider sub-regional need. Our Client supports the view that West Lancashire should aim to deliver housing and economic growth to support the sub-regional area. However, the level of growth included within Option C would not sufficiently assist the sub-regional area. Paragraph 3.2.11 of the report considers development across the sub-regional area and states: - "With Options C and D, regarding both housing and employment land requirements, they involve West Lancashire meeting an unmet housing need from authorities in the Liverpool City Region and a wider sub-regional demand for large-scale logistics development. If such a need or demand is realised from Liverpool City region or other surrounding local authorities as the Local plan Review progresses, under the Duty to Cooperate, the Council are required to work with our neighbours to find the best solution for meeting those unmet needs and demands. Depending on those discussions, West Lancashire may be identified as the best location to meet those unmet needs and demands." - Our Client agrees with the assertion made at the end of paragraph 3.2.11 that West Lancashire might be the best location to meet the unmet need. Other Local Authorities within the region are substantially more constrained than West Lancashire. Sefton; for example, is constrained by Sites of Special Scientific Interest, Flood Risk as well as internationally renowned golf courses. Therefore, it may be difficult for Sefton to provide a sufficient quantum of land for development to support the region, and the neighbouring authority of West Lancashire may be the most appropriate alternative option. On this basis, Option C should be discounted given that it would not assist the sub-region in meeting its housing need. - Option D reflects a level of development needs significantly above the OAN to seek growth of West Lancashire economically whilst meeting a wider sub-regional need. Option D is supported by Our Client as this represents a sustainable option where West Lancashire can make a realistic contribution to meeting the development needs of the sub-region. - Option E comprises an option which greatly exceeds the OAN and which West Lancashire claims as being their 'absolute maximum' option in terms of what is potentially deliverable. Option E is also supported by our Client. This option could assist West

ID	Representor Comments	Council Response
	<p>Lancashire in increasing their working age-population and retaining students from Edge Hill within the West Lancashire. - In summary, our Client supports Options D and E. However, it is recommended that further work be undertaken on a sub-regional level to ascertain the level of growth which can be accommodated within each Borough, sustainably, without harm to the environment. - The Council identifies within paragraph 3.2.10 that Options C to E will require Green Belt release. Our Client supports the Council in releasing Green Belt land for development</p>	
91	<p>Thank you for inviting comments on the West Lancashire Local Plan Review Issues and Options - (2017). At this stage, as the review of the Local Plan is at a very early stage and no specific policies or - development sites have been identified, the Council only has general comments to make. - - Housing and Economic Development Needs - The Council support the identified objectively assessed housing need of 241 units per annum and the employment land requirement for office and industrial uses of 22.6 ha (use classes B1a/b/c and B2 and excluding B8 land) identified in the West Lancashire Housing and Economic Development Needs Assessment (2017), having been prepared in accordance with the NPPF and PPG guidance to the best of our knowledge.</p>	Noted
95	<p>The Options Paper establishes a series of options relating to the amount of housing and employment land to be provided, as summarised in the table below. - - [See document for table] - - 3.9 The descriptions of the scenarios strongly implies that Option A is considered as a ‘very minimum level of new development that West Lancashire could be argued to need’, with Option B broadly representative of the objectively assessed need for housing and employment land. - 3.10 Subsequent options are presented as providing for levels of need which exceed the local OAN for West Lancashire, with levels of provision assumed to support a level of unmet housing need and sub-regional strategic need for large-scale logistics. - 3.11 Option E is described as providing for ‘an absolute maximum option in terms of what is potentially deliverable’ with reference made to the extremely challenging delivery context for this option, particularly in relation to housing. - - 3.12 The Topic Paper indicates that the suggested options reflect the emerging evidence of development needs for West Lancashire in the draft report of the Liverpool City Region Regional Strategic Housing and Employment Land Market Assessment (LCR SHELMA) which seeks to identify an OAN for employment and housing needs. However the SHELMA report has yet to be published and therefore we cannot comment on its contents. We consider that the SHELMA, when published, will have a potential impact on the evidence-based justification for the development of policy in West Lancashire. On behalf of DWH, we reserve a position to comment on its content when published. - 3.13 WLBC has, however, published a Housing and Economic Development Needs Assessment (HDNA), prepared by GL Hearn, to inform the consultation. This concludes that there is an OAN for at least 221 dwellings per annum in West Lancashire and indicates that a higher level of housing provision (241 dpa) will be needed to support the economic growth scenario which is more aspirational. - 3.14 The following table summarises the adjustments applied in arriving at the concluded OAN for West Lancashire within the HEDNA. - - [see document for table 3.2] - - 3.15 The scope of the HEDNA is limited to a presentation of the ‘local’ need for housing and employment land in West Lancashire and confirms that the LCR SHELMA will consider the future strategic need for warehouse/distribution (B8) floorspace across the City Region taking into account of demand drivers and the growth of the Port of Liverpool. - 3.16 Therefore whilst the HEDNA provides an evidence-based justification for Options A and B, the absence of an evidence-based position on the need for housing across the Liverpool City Region – and particularly those authorities sharing the strongest housing market relationships with West Lancashire – means that it is therefore challenging to evaluate the justification for Options C and D in particular. Equally, in terms of the level of employment land proposed beyond Option</p>	Noted

B, the absence of the SHELMA document makes it impossible to judge how the additional provision for employment land in the remaining options relates to the overall assessed need for large-scale logistics land across the City Region. - 3.17 It is recognised that this results from a delay in the production of sub-regional evidence, and it is appreciated that WLBC has sought to maintain progress in preparing its Local Plan by advancing with the planned consultation. However, the partial nature of the evidence base underpinning the Options Paper is considered a significant limitation in providing a fully considered response. - 3.18 It is equally evident that many parts of the HEDNA appear to have been adapted from the SHELMA, meaning that a limited amount of information is included to support a number of the critical adjustments proposed. It is assumed that the detail supporting these justifications is included in the SHELMA, with the adjustments applied based on a considered sub-regional view. Whilst it is considered beneficial to ensure a level of consistency across the Liverpool City Region, the absence of the evidence in the HEDNA again poses a challenge in enabling meaningful comment on its conclusions. - 3.19 In this context, the expedient publication of the SHELMA will be critical to ensuring that subsequent stages of the West Lancashire Plan's development are based upon a more fully considered evidence base. - 3.20 Notwithstanding this, Turley Economics has critiqued the HEDNA and our assessment is presented in a separate report which is appended to these representations. In summary: - • Whilst a range of demographic projections are presented within the HEDNA – of which several are based on longer-term population growth trends – these are largely dismissed in favour of retaining the official projections, despite the higher level of need implied. It is unclear whether this results from consideration of these sensitivity scenarios at a City Region level. However, in the absence of this justification, the rationale for selecting the preferred population projection is not considered adequately evidenced; - • The HEDNA applies an adjustment to the household formation rates applied within the 2014-based SNHP, which recognises the impact of a long-term worsening in affordability on younger household formation. However, whilst such an adjustment is considered as necessary, the HEDNA seeks to make the adjustment on the basis of a return to regional and national trends. It is widely acknowledged that affordability has nationally had a detrimental impact on the extent to which younger households have been able to access the housing market. This adjustment therefore does not assume a positive recovery in the context of a nationally recognised 'housing crisis'. It is considered that a more positive adjustment is more appropriate to respond to this issue; - • In assessing the implications of supporting forecast employment job growth on population pressures, issues relating to the uncertainties of forecasting future labour-force behaviours are acknowledged. Preference is placed on the use of the labour-force assumptions within the Experian forecast. Whilst the rationale for using this information is understood, it is not considered that adequate consideration is given to the risks associated with assuming that a large proportion of future employment will be supported by older cohorts in the labour-force. This is considered to be particularly pertinent in the context of the types of jobs which West Lancashire has traditionally seen as its growth sectors and which are likely to be forecast to grow in the future under both a baseline and a growth scenario; and - • The HEDNA recognises that West Lancashire shows evidence of worsening market signals. In particular, it is noted that the borough has seen affordability issues considerably worsen, even in the context of a worsening national picture. In this context, the decision to apply an upward adjustment is considered appropriate, although it is considered that the justification for the scale of adjustment is unclear and should be more clearly articulated. - - The Most Appropriate Development Option - 3.21 If WLBC is to adopt a positive Local Plan which seeks to boost the local economy by significantly embracing the employment potential that is expected to arise from the Liverpool City Region and in particular, the anticipated demand in logistics, alongside benefiting from economic growth arising from existing large scale employers such as Edge Hill

ID	Representor Comments	Council Response
	<p>University then it will be essential for WLBC to advocate a Development - 10 - Option which meets this economic ambition if it is to establish a sustainable approach to growth. - 3.22 In this context, and while we await the publication of the LCR SHELMA, it is the view of DWH that a housing requirement over 300 dwellings per annum is likely to be necessary to support this ambition. - - Reserve sites - 3.23 The SDOP identifies that a requirement of 300 dwellings per annum would equate to a need for approximately 12ha of land per annum, which assumes a net density of 25 dwellings per hectare. It is, however, unrealistic to expect that every identified site – either brownfield or greenfield – will be delivered or will provide the number of new homes from it within timescale envisaged. Recent DCLG analysis¹ has indicated that 10-20% of planning permissions are not implemented, whilst a further 15-20% are subject to a revised application process which delays delivery. As such, it is reasonable to assume that upwards of 15% of the total supply anticipated within the plan period may not come forward. It is therefore essential to allow the flexibility of additional provision. - 3.24 Numerous Local Plans have acknowledged that not all sites are delivered within the timescales expected. This has been an issue in West Lancashire in recent years (see below). The Local Plans Expert Group² (LPEG) identified this as a particular problem in maintaining a supply of homes which are required to meet needs: - “...because Plans tend only to allocate the minimum amount of land they consider necessary, once adopted, there is little that Local Plans can do to address any shortages that appear in the five year supply...” (paragraph 11.2) - 3.25 The LPEG report therefore set out a clear recommendation that Local Plans should make provision for, and provide a mechanism for the release of, developable ‘reserve sites’ equivalent to 20% of their housing requirement. This is a particular issue where, as in West Lancashire, Green Belt boundaries are tightly drawn around the urban area. - 3.26 The identification of reserve sites has been progressed by other local authorities throughout the UK, including in the North West. For example: - • Cheshire East provided an additional 7% housing land to provide for an element of non-delivery; an - • The draft St Helens Local Plan³ has identified land for Green Belt releases and safeguarding, and includes a mechanism to undertake a review of those sites for release should there be under-delivery during the course of the plan period. - 3.27 The inclusion of a similar approach in the Local Plan Review would be a positive way of reducing the delivery risk which is currently inherent within it and ensure it meets the test of soundness of being “effective” – i.e. deliverable over its plan period. In effect, if the housing requirement for the Borough is 300 dwellings per annum, the Local Plan Review should make provision for sufficient land to provide 360 dwellings per annum, thereby providing 20% reserve sites against the minimum development requirement. - - [See document for footnotes]</p>	
96	<p>As we will set out later, the key matters for consideration are the quantum of development set against the - willingness to prioritise locations that can maximize the opportunity to deliver substantial positive planning - impacts. Whilst the quantum is important, in isolation it will not arrest the key challenges which face West - Lancashire in the context of the city region. The overriding objective must be to promote a Plan which is - ambitious and has the best prospect of delivering against those key challenges and achieving tangible progress - towards achieving the set Vision. - Options A and B represent growth scenarios that would represent a bare minimum in terms of what would be - needed to meet objectively assessed needs, and it is difficult to reconcile how that approach could feasibly result - in achieving the Vision to any material extent. These are options which fundamentally lack ambition and will not - be able to provide West Lancashire the opportunity to compete on a city region level, particularly given the - growth agenda in other surrounding areas. - Option E on the other hand represents a more ambitious approach which is largely predicated upon the objective - to fully meet identified affordable housing need for the borough, on the assumption of housing delivery of mixed -</p>	Noted

ID	Representor Comments	Council Response
	<p>schemes with affordable housing provided in accord with Plan standards. It also promotes a substantial increase - in the delivery of employment land, reflecting the growth of the logistics sector and the excellent connectivity of - those areas on and close to the M58 corridor. Whilst Option E is ambitious and would work proactively to deliver much needed affordable housing, it will represent a substantial change of approach and may be challenging to - deliver unless the Council is willing to promote appropriate and well-considered elements of Green Belt release. - In our view, the step-change required to achieve the Vision and to allow West Lancashire to compete more - effectively within the city region necessitates the ambition to achieve Option E. The Council's evidence very - clearly shows that a typical approach to identifying market housing need would not be ambitious and would - largely reflect established take-up levels and do not provide the opportunity for growth. - The stark problems in terms of the affordability ratios and lack of specialist accommodation are all a product of - failing to identify housing opportunities in locations with a credible opportunity to be delivered in a timely manner. - Clearly the Council is not fully in control of investment decisions as to the timing of the delivery of housing sites - with positive allocations, but given that experience through the last Plan period it is even more crucial now to - grasp that opportunity and plan for sustainable growth. - Option E can provide a framework to deliver a compelling opportunity to meet thee latent needs, and particularly - to address affordable housing need and the need for well-considered accommodation for older people. Given the - experience from the previous Plan period, it is important to identify locations for housing needs in locations where - the market can be able to sustain these and deliver these within the earlier part of the Plan period. The land to - the south of St Joseph's Seminary provides that opportunity and also the basis for enabling development to bring - the heritage assets to the north (the Seminary) back into active use.</p>	
97	<p>The Strategic Development Options focus on potential options for delivering new housing and employment land, and the - options cover three variables: - ☐ How much new housing and employment land we should provide each year - ☐ How far into the future the Local Plan is to look (the Local Plan period) - ☐ How we spread new development land around the Borough - - In relation to the amount of development land required per year, we are considering five options. The options are, for each year - of the plan period, - ☐ A: Approximately 8 ha of land (for 200 dwellings) and 2 ha of employment land - ☐ B: Approximately 12 ha of land (for 300 dwellings) and 3 ha of employment land - ☐ C: Approximately 16 ha of land (for 400 dwellings) and 4 ha of employment land - ☐ D: Approximately 20 ha of land (for 500 dwellings) and 5 ha of employment land - ☐ E: Approximately 24 ha of land (for 600 dwellings) and 6 ha of employment land - - As we will set out later, the key matters for consideration are the quantum of development set against the willingness to prioritise locations that can maximize the opportunity to deliver substantial positive planning impacts. Whilst the quantum is important, in isolation it will not arrest the key challenges which face West Lancashire in the context of the city region. The overriding objective must be to promote a Plan which is ambitious and has the best prospect of delivering against those key challenges and achieving tangible progress towards achieving the set Vision. - Options A and B represent growth scenarios that would represent a bare minimum in terms of what would be needed to meet objectively assessed needs, and it is difficult to reconcile how that approach could feasibly result in achieving the Vision to any material extent. These are options which fundamentally lack ambition and will not be able to provide West Lancashire the opportunity to compete on a city region level, particularly given the growth agenda in other surrounding areas. - - Option E on the other hand represents a more ambitious approach which is largely predicated upon the objective to fully meet identified affordable housing need for the borough, on the assumption of housing delivery of mixed</p>	Noted

ID	Representor Comments	Council Response
	<p>schemes with affordable housing provided in accord with Plan standards. It also promotes a substantial increase in the delivery of employment land, reflecting the growth of the logistics sector and the excellent connectivity of those areas on and close to the M58 corridor. Whilst Option E is ambitious and would work proactively to deliver - much needed affordable housing, it will represent a substantial change of approach and may be challenging to deliver unless the Council is willing to promote appropriate and well-considered elements of Green Belt release. - In our view, the step-change required to achieve the Vision and to allow West Lancashire to compete more effectively within the city region necessitates the ambition to achieve Option E. The Council's evidence very clearly shows that a typical approach to identifying market housing need would not be ambitious and would largely reflect established take-up levels and do not provide the opportunity for growth. - - Option E provides a compelling opportunity to meet housing and employment land requirements to drive growth, and through the allocations process these need to be in locations where the market can be able to sustain these and deliver these within the earlier part of the Plan period. Should the Skelmersdale housing market improve, those Skelmersdale-based opportunity sites can come forward.</p>	
98	<p>The Council is seeking to ensure that the Local Plan Review is aspirational in its approach and we would expect this to guide the development option selected. At this stage it is not possible to comment on the most appropriate development option however, McDermott Homes reserves the right to provide further representations on this matter at a later stage.</p>	Noted
99	<p>Our Clients support a pro-growth approach for West Lancashire, to ensure it is aspirational and meets the full, objectively assessed needs of the Borough over the Plan Period. Paragraph 47 of the NPPF is clear - local planning authorities are required to "boost significantly the supply of housing" and in doing so, must ensure that the Local Plan meets the "full objectively assessed needs for market and affordable housing in the housing market area". At this stage, we have not undertaken a detailed examination of the Council's Housing and Economic Development Needs Assessment ("HEDNA") in relation to the full Objectively Assessed Needs ("OAN") however it is noted that there is an identified required to apply an uplift to the Borough's housing need figure to support economic growth and meet affordable housing provision. The HEDNA does however only cover the period 2012 – 2037. If the Plan period is to be extended, which our Clients support, a commitment to reviewing the OAN during the Plan period up to 2050 will be required because household projections for this time are unknown. The Council's current Local Plan requirement is 324 dpa. It is our Clients' position that to meet the aspirational needs of the Borough and to address affordable housing shortfall, at the very minimum there is a requirement to deliver a higher housing figure (minimum of 400 – 500 dwellings and 4/5 ha of employment land per annum. This is to ensure that the emerging Local Plan achieves an ambitious pro-growth target that West Lancashire should seek to deliver. To facilitate this Green Belt release will be required to meet these needs, because if not the Plan will be constrained. A lower requirement will not take account of market signals adjustment, as required by the PPG or align with the economic and housing strategies for the area, and will fail to take account of a sub-regional need for land for large scale logistics, which will impact on both housing and employment land requirements. The housing requirement from the Liverpool City Region SHELMA are unavailable at this time, and our Clients support the Council's commitment for the housing requirement to be revised when the SHELMA from the Liverpool City Region is published. This is because of the overlap between the Housing Market Area of Central LCR and Mid Mersey HMA, which will affect the housing and employment requirements within West Lancashire. If any departure from the Liverpool City Region SHELMA is proposed, necessary justification must be provided to ensure that the Council is able to demonstrate that the emerging Local</p>	Noted

ID	Representor Comments	Council Response
	<p>Plan housing requirement is appropriately justified. It is our Clients' consideration that a suitable buffer should be applied to the housing requirement, to ensure that a sufficient supply of housing is provided, in accordance with Paragraph 47 of the NPPF. This will ensure there is flexibility, choice and competition within the housing market, and provide greater opportunities for housing need to be met in full, and ensure the Local Plan is consistent with the NPPF. Policies should be sufficiently flexible and provide a positive framework to assist housing delivery and avoid unnecessary restrictive policies.</p>	
108	<p>As it is impossible to know how many dwellings are needed, option A appears the best, to ensure that existing building land is used, empty properties are used, brownfield sites are used, better housing mixes, so that single people and elderly can have smaller properties, developments like Brookside in Ormskirk.</p>	Noted
111	<p>Section 3.1 focuses on the Development Options for the Borough. These 5 options are based - around the following three variables: - 1. The amount of development land required for housing and employment - uses per year - 2. How far into the future the Local Plan is to look (the Local Plan period) - 3. The way the total amount of development land required throughout the - Local Plan period is spread across the Borough. - The options provided within section 3 are as follows: - A. "Approximately 8ha of land (for 200 dwellings) per year and 2ha of - employment land per year - B. Approximately 12ha of land (for 300 dwellings) per year and 3ha of - employment land per year - C. Approximately 16ha of land (for 400 dwellings) per year and 4ha of - employment land per year - D. Approximately 20ha of land (for 500 dwellings) per year and 5ha of - employment land per year - E. Approximately 24ha of land (for 600 dwellings) and 6ha of employment - land per year." It is identified within paragraph 3.2.2 of the options paper that the strategic options have been identified through consideration of the emerging SHELMA document. - Option A is the very minimum level of new development that West Lancashire could be argued to - need. This Option is not supported by our Client as it does not provide for growth and only seeks - to provide the minimum level of development. This therefore does not accord with the - requirement for positively prepared plans within Paragraph 182 of the Framework. Option B sees an uplift for development needs compared to the very minimum for Option A, - reflecting a housing scenario that incorporates forecast job growth and an employment land figure - that takes account of past trends. This option is not supported by our Client as it does not provide - any support to the sub-regional area and is actually lower than the existing Plan target. Housing - will need to be provided within the wider sub-regional areas, including WLBC, to provide housing - to meet a range of needs. West Lancashire is a sustainable location for economic and housing - growth. The concerns raised by ourselves in relation to Options A and B are also recognised by the - Council within paragraph 3.2.9: "For example, Options A and B would clearly have the least environmental - impact and, depending on how the housing and employment land - requirements were divided up between the different parts of the Borough and, - depending on how the housing and employment land requirements were - divided up between the different parts of the Borough and depending on the - length of the Local plan period, may not require additional green Belt release - (although they would require development of greenfield land that is in the - current Local Plan either as an existing allocation or as safeguarded land). - However, while these options are based on potential scenarios for - development needs, the requirements are lower than those in the current - Local Plan and what could typically be expected in West Lancashire and - so could stymy economic development in West Lancashire and have a - detrimental social impact as a result" Our Client fully agrees with the risks identified in paragraph 3.2.9 and on this basis recommends that neither of these development options are selected. - Option C is an above-OAN option that</p>	Noted

ID**Representor Comments****Council Response**

it could be argued seeks to deliver more housing and - employment land than is strictly necessary in West Lancashire to meet the wider sub-regional - need. Our Client supports the view that West Lancashire should aim to deliver housing and - economic growth to support the sub-regional area. However, the level of growth included within - Option C would not sufficiently assist the sub-regional area. Paragraph 3.2.11 of the report - considers development across the sub-regional area and states: - “With Options C and D, regarding both housing and employment land - requirements, they involve West Lancashire meeting an unmet housing need - from authorities in the Liverpool City Region and a wider sub-regional demand - for large-scale logistics development. If such a need or demand is realised - from Liverpool City region or other surrounding local authorities as the Local - plan Review progresses, under the Duty to Co-operate, the Council are - required to work with our neighbours to find the best solution for meeting those - unmet needs and demands. Depending on those discussions, West - Lancashire may be identified as the best location to meet those unmet - needs and demands.” - Our Client agrees with the assertion made at the end of paragraph 3.2.11 that West Lancashire - might be the best location to meet the unmet need. Other Local Authorities within the region are - substantially more constrained than West Lancashire. Sefton; for example, is constrained by - Sites of Special Scientific Interest, Flood Risk as well as internationally renowned golf courses. - Therefore, it may be difficult for Sefton to provide a sufficient quantum of land for development to - support the region, and the neighbouring authority of West Lancashire may be the most - appropriate alternative option. On this basis, Option C should be discounted given that it would - not assist the sub-region in meeting its housing need. - Option D reflects a level of development needs significantly above the OAN to seek growth of - West Lancashire economically whilst meeting a wider sub-regional need. Option D is supported - by Our Client as this represents a sustainable option where West Lancashire can make a realistic - contribution to meeting the development needs of the sub-region. - Option E comprises an option which greatly exceeds the OAN and which West Lancashire claims - as being their ‘absolute maximum’ option in terms of what is potentially deliverable. Option E is - also supported by our Client. This option could assist West Lancashire in increasing their working - age-population and retaining students from Edge Hill within the West Lancashire In summary, our Client supports Options D and E. However, it is recommended that further work - be undertaken on a sub-regional level to ascertain the level of growth which can be - accommodated within each Borough, sustainably, without harm to the environment. - The Council identifies within paragraph 3.2.10 that Options C to E will require Green Belt release. - Our Client supports the Council in releasing Green Belt land for development.

Question 10: Should the Council go for a standard Plan Period (Option I) or plan longer-term (Option II)? Why?

ID	Representor Comments	Council Response
1	Option 1 you need to be flexible with planning don't set it in stone for such long periods	Noted
2	Option 1 or shorter as planning needs to be flexible	Noted
9	Option 2- to give certainty to home owners and businesses alike.	Noted
14	I think longer because there are not to many issues that are going to change a great deal	Noted
18	No comment.	
19	Option 11 - 2012 - 2050. A longterm view is much more likely to be a strategic sustainable plan less affected by political and economic changes.	Noted
20	Option 1. This is a more realistic proposition albeit the goalposts may be changed at any time during the plan. A crystal ball may be required to predict the needs and requirements likely to be faced in 2050.	Noted
23	Option II. A cautious and considered approach to development will allow for changing demographics and for continual reassessment as the plan unfolds. It will also limit the impact on people who already live and pay taxes in West Lancashire.	Noted
24	Go for Option II. It will prevent the Council having to spend a lot of money on consultation exercises. Short term solutions don't keep up with change eg sustainability takes a long time to set up and produce results.	Noted
26	The shorter term brings it in line with the majority of LA I am aware of.	Noted
28	Option 1 - The timescale in option 2 is too far into the future.	Noted
30	Given only two choices Option 1. Ideally it should be for a shorter period of 10 years up to 2027 so the impact of adjacent developing policies and Liverpool superport can be properly evaluated for their impact on West Lancashire.	Noted. National policy requires a Local Plan period to be at least 15 years in length.
31	Option 1 - Although it is certainly worth looking far ahead in regard to climate change. I do not believe meaningful plans can be made up to 2050 for housing and employment developments. - The rate of change of technology, work/life balance, longevity, geopolitical stability, pandemic infection, lack of effective antibiotics etc. may have each dramatic effects.	Noted
32	Option II it is essential that all local authorities plan together and longer term. Climate Change, employment, health and welfare, are all issues with far reaching implications	Noted
35	Whilst the aspirations of the Council to plan longer term for the Borough of West Lancashire, which will create stability in the planning policy situation is supported, this approach must be given careful consideration, and may not necessarily be the most appropriate for West Lancashire. - To plan for a longer Plan period will require reliance to be put upon existing evidence and data for a considerable period of time, despite the fact that such information is not intended to forecast so far into the future beyond the end of the current Plan period. Confirming this point, the SHELMA does not forecast beyond 2037. - Therefore, it is considered that the standard Plan period should be maintained, which will ensure that the Plan and policies within it, accurately reflect the development needs and requirements of the Borough. - However, it would also be prudent of the Council to identify further sites of safeguarded land, alongside other potential future sources of supply, which will ensure that the Green Belt	Noted

ID	Representor Comments	Council Response
	<p>boundary will not require significant change following the end of the Plan period. It is important to note that such additional identification may need to include some Green Belt land. It may also be appropriate for policy to allow for such land to come forward ahead of the end of the Plan period in such circumstances where the development needs of the Borough are not being effectively met. - At Paragraph 3.3.4 the document states that 'a portion of the housing and employment land requirements ultimately identified in the new Local Plan will have already been met', due to the base date of 2012. However, we would also like to draw attention to the fact that a number of the current allocations, including the Yew Tree Farm site have not delivered the level of development anticipated at the start of the Plan period, and as such delivery so far within the Plan period must be carefully considered irrespective of which Plan period is considered the most appropriate.</p>	
36	<p>Life of Local Plan - we think it a good idea, both in terms of stability, cost and man hours, if the Local Plan was in place for a longer period than it currently is. As this review shows, the current Local Plan hasn't been in place that long, and is already being reviewed. Increasing the length of the next Local Plan, would provide stability for everyone, in terms of knowing what is, or isn't agreed. It must cost a substantial amount of money to review and put in place a new Local Plan, plus man hours required to do it, therefore it would be in everyone's benefit if it wasn't reviewed as often.</p>	Noted
39	<p>Response A – Option 1 - - Option I (2012-27) – This is a more realistic period for a small borough which can be subject to considerable changes as part of the wider Liverpool City Region. -</p>	Noted
40	<p>In our view Option 2 is too long as it will be difficult to forecast growth (economic and housing) to 2050. It is accepted that any review of the Green Belt should be strategic and long term (a key requirement of NPPF), therefore we would advocate a hybrid of the two whereby safeguarded sites are identified for the second phase of the Plan, however, these will be subject to a review mechanism at the appropriate time.</p>	Noted
42	<p>We are anticipating a "25-year plan for nature" from the UK Government, as promised in its 2015 manifesto; though we have been waiting for it since May 2015. Consequent to any change in policy from the incoming Government, it would suit our purposes to have a plan that extends at least as far as 2037.</p>	Noted
43	<p>It should be noted that the length of the plan period (15 to 30 years) does cause some challenge for school planning in terms of accuracy of pupil projections. Firstly, we cannot predict how many children will be born in a particularly year and assumptions need to be made about what births will come forward in future years. Secondary, the birth rate has to be considered in conjunction with the housing projections. In the short term the pupil projections use the housing land supply document and assess demand against developments with planning consent, whereas the longer term projections assume that all developments included in the local plan will secure planning consent. - A number of options in terms of scale of development are being considered by West Lancashire. Regardless of which option is identified by the local planning authority the impact on school places would need to be calculated based on LCC's Education Contribution Methodology. Once the preferred option has been identified LCC would revisit the position statement provided at August 2016. - Please note that any developments included within the updated Local Plan that already have planning consent have already been taken into account in terms of LCC's pupil projections. For any development that does not currently have planning consent, these would need to be incorporated into LCC's short term/long term pupil projections. - Where a number of developments are being brought forward within close proximity to each other, LCC would ask that the local planning authority consider whether a</p>	Noted, however national policy does require Local Plans to cover at least a 15 year period.

ID	Representor Comments	Council Response
	<p>new school should be the preferred option in terms of addressing demand. To achieve this the local planning authority would need to consider these applications in terms of it being one strategic site. - 3.7.2 The education statement will need to be revisited once Local Plan sites are determined.</p>	
46	<p>Option II- 2012 to 2050 because this will provide a strategic platform on which to base a realistic timescale to really achieve genuine regeneration and transformation and so be in accord with the wider sub-regional need. Far better to fit in with a wider strategic vision rather than an 'ad-hoc' approach given over several time periods. This will allow for quality long term planning towards the infrastructure needs to ensure proper provision of planned settlements.</p>	
48	<p>The longer term plan should be adopted - 2012-2050. This ties in with the Climate Change Act that has a target for carbon reduction of 60% by 2050.</p>	Noted
50	<p>The Topic Paper presents two options for the Plan Period: - 1. 2012 to 2037; and - 2. 2012 to 2050. - Option 1 ensures the plan will represent the standard 15-year plan period from the anticipated - year of adoption (intended to be 2020). Option 2 extends the plan period for a further 13 years, - potentially covering a 30 year period were the Plan to be adopted in 2020. - While the ability to plan for a longer period of time should be welcomed, it is likely that there will be - less certainty of the later years of the plan period, particularly were the plan to run till 2050. The - Strategic Options Paper states that the SHELMA only forecasts to 2037 (Option 1), indicating that - housing and employment needs beyond this are likely to be increasingly speculative. Furthermore, - Highways England's Road Investment Strategy (RIS) functions in 5 year blocks, with RIS 2 - planned for the period 2020 – 2025. - It is also noted that the NPPF states in paragraph 157 that Local Plans should: - "be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of - longer term requirements, and be kept up to date" - Highways England will look to support those options that enable greater certainty over the - distribution and type of development, and that allows the identification of the necessary - infrastructure to support the anticipated levels of growth. It is considered that Option 1 is - more likely to provide the certainty necessary to accurately plan infrastructure - requirements over the Plan period.</p>	Noted
56	<p>The Framework [§157] identifies the need for local plans to plan for a 15 year time horizon to ensure a long term approach is taken and sufficient land for development is provided. Taylor Wimpey supports an end date for the new Local Plan of at least 2035 to meet this requirement if the Local Plan is adopted by the start of 2020. If the adoption of the plan is delayed however, the timeframe should be extended beyond 2035 to ensure that the minimum 15 year time horizon will be achieved and flexibility is built into the plan. - Taylor Wimpey welcomes that the Council is also considering Option II which would see a longer plan period (possibly to 2050) that could help ensure that the Council is planning the future growth of the Borough in a co-ordinated way. - Whilst the lack of reliable projections for housing and employment need to 2050 may make such a long plan period impractical, a third option could be to set a 15 year plan period but also safeguard additional land to provide greater flexibility required should Green Belt release be necessary. The approach (taken in the currently adopted West Lancashire Local Plan) of allocating reserve Strategic sites would give more flexibility by allowing reserve sites to be taken out of the safeguarded land supply if certain triggers are met. Policy RS6 of the adopted Local Plan includes the following mechanism for releasing reserve sites after 5 years of the plan: - "If less than 80% of the pro rata housing target has been delivered after 5 years of the Plan period, then the Council will release land from that safeguarded from development..." - Such an approach to reserve sites is supported by The Local Plan Expert Group [LPEG] report to Government which states that: -</p>	Noted

ID	Representor Comments	Council Response
	<p>“the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF”. - It is noted that in any case, a Green Belt Study was prepared in 2011/12 to inform the currently adopted Local Plan and whilst at least some parts of the study are still relevant, an updated Green Belt Review may be needed to identify further land for release should more housing need to be accommodated.</p>	
57	<p>Whilst it is necessary to look at longer term needs, economic, societal and other changes which will inevitably occur may render an overly prescriptive local plan redundant within a short period of time. Therefore, a broad brush strategy for the longer term, with more detailed policy guidance for the shorter term would seem to be a sensible compromise.</p>	Noted
58	<p>Both options would meet the NPPF preference for plans to have at least a 15 year time horizon. Both also provide a sufficient length of time to ensure that the plans vision can be met. - - Whilst laudable option II, providing a plan period until 2050, is unlikely to be practical due to the significant uncertainties associated with such a long time-frame, not least due to the lack of reliable projections for both housing and employment need over this period. - - The HBF recommends that a hybrid approach is adopted. The plan period could include the option I period of 2012 to 2037, providing sufficient allocations to meet the needs in full over this period. However the plan could also identify sufficient safeguarded land, alongside other potential future sources of supply, to ensure that the Green Belt boundary endures until at least 2050. If, as anticipated, exceptional circumstances can be demonstrated this approach would conform to the NPPF. Paragraph 85 of the NPPF identifies that where necessary Local Plans should provide safeguarded land to meet longer term development needs stretching “...well beyond the plan period...” and that local authorities should satisfy themselves that Green Belt boundaries “...will not need to be altered at the end of the development plan period...”. - - The above approach will not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. It is recommended that the Council carefully considers the amount of land required to ensure that Green Belt boundaries will not be required to be further amended upon the review of this Local Plan.</p>	Noted
60	<p>3.1 Two options are set out for consultation these being: - • 2012 to 2037; or, - • 2012 to 2050. - 3.2 Our view is that the plan period for West Lancashire should be 2012 to 2050. Our reasons for this are as follows. - 3.3 The first is that West Lancashire will require Green Belt release. On that point Government guidance is clear. Paragraph 83 states that “At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”. We also refer to paragraph 85 of the NPPF and specifically the third and fifth bullet points which are: - • Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period - • Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period - 3.4 As the Council will be aware they reviewed their Green Belt as part of the adopted Local Plan and the LPR is clear that further Green Belt releases will be required for the majority of the housing options. Therefore with a review being necessary using either plan period, it would be in the interests of all parties and in accordance with Government guidance that the plan period is to 2050. This would also necessitate further work on the OAN post 2037.</p>	Noted

ID	Representor Comments	Council Response
61	<p>It makes sense to have a longer term strategy to 2050. However, this would have to be properly planned and managed with regular review periods(short, medium & long term goals) because the current Local Plan will only be approximately half way through when the new plan is adopted and already the exiting plan is in need of review.</p>	Noted
62	<p>In respect of the Local Plan Period two options are put forward: - I. 2012 to 2037; and, - II. 2012 to 2050. - It is considered that the first option (2012 to 2037) is most appropriate, this would exceed the minimum period required for a Local Plan (15 years) from the year of anticipated adoption in 2020 and align with the forecast period in the SHELMA. A plan period to 2050 appears excessive and it is unclear at this stage how sufficient evidence and certainty over such a long timeframe would be ensured. - However, the Council may wish to consider adopting a 'hybrid approach' which could include identifying sufficient allocations to meet the needs in full over the period between 2012 and 2037, whilst also identifying sufficient safeguarded land and other potential future sources of supply to ensure that the Green Belt boundary endures until at least 2050. Such an approach would be consistent with the NPPF which requires LPAs, when reviewing Green Belt boundaries, to consider their intended permanence in the long term so that they are capable of ensuring beyond the plan period. - Notwithstanding the above it is considered vital that the new Local Plan provides appropriate triggers to enable it to be reviewed at appropriate junctures, ensuring sufficient flexibility to adapt to rapid change during the plan period, in accordance with Paragraph 14 of the NPPF.</p>	Noted
64	<p>It is our Clients' view that if the Council is seeking to deliver an ambitious Plan, which we consider it should, then the Council should extend the Plan period to 2050, rather than 2037. This will help to realise the longer term potential for growth and development with Skelmersdale. However, this would be dependent on whether sufficient land is released i.e. greater than 400 dpa. If this is the case, a longer Plan period may be appropriate. However, there remains a number of unknowns associated with this, in particular, the lack of reliable projections for both housing and employment need over the plan period. It is important if the Council progresses with a longer Plan period, that any allocations are deliverable, suitable and available, and will help achieve the Plan requirements, both in the short and long term. - - Our Clients would recommend that the emerging Local Plan includes safeguarding land for the post 2037 period. It should include a mechanism within the Plan which triggers an early review or land release if the Council fails to deliver the level of housing required i.e. when housing delivery is significantly below the anticipated level (for circa 1-3 years), and if this is due to a lack of land supply, a partial or full Plan review will be undertaken. - - We support the Council's position that they would need to review the evidence base in light of the revised Plan period, because it will have been largely based on a shorter Plan period.</p>	Noted
66	<p>The plan period should align with the Plan's evidence on housing and economic needs, as such the - period 2012 to 2037 is considered to be the most appropriate as this will align with the evidence - contained in the HEDNA. The use of a plan period extending to 2050 is not considered appropriate nor would it be justified by any evidence on housing and economic needs. Indeed, extending the plan period would instead act to artificially suppress annual housing delivery and would not be in accordance with the requirements of the Framework.</p>	Noted, although the Council is unclear how extending the Plan period to 2050 would "artificially suppress annual housing delivery".
67	<p>On balance the standard 15 year period is preferable as it provides a framework which can be reviewed and adapted to meet changing circumstances and priorities. - One consideration that arises from the longer plan period is the requirement in the NPPF for Local Plans to define Green Belt boundaries to include for safeguarded land to meet loner term development needs "sell beyond the plan period". This requirement is</p>	Noted

ID	Representor Comments	Council Response
	likely to apply equally if the plan period were 15 or 30 years.	
69	Option II, we need to plan for the longer term. - The Climate Change Act, in line with inter-governmental agreements, sets targets up to 2050 also.	Noted
70	The two plan periods highlighted in the paper are: - • 2012 – 2037; and - • 2012 – 2050. - - These allow for planning over a period of 25 or 38 years. The Commissioners believe there is - merit in planning for a longer period of time as this will result in planning more positively for - growth and provide more certainty regarding future development coming forward. - - We believe there are sites (including the Commissioners’ landholdings) which can provide - additional land to meeting this need over the longer plan period. - - Irrespective of which plan period is chosen, there is clearly going to be a need to examine - Green Belt land to accommodate future growth. As such, and in line with our comments above, - we believe a revised Green Belt Study should be undertaken.	Noted
72	option 1	Noted
73	The University agrees that it is appropriate for the plan to cover a period of at least 15 - years from the anticipated date of adoption, in accordance with national policy6. - - Whilst the preparation of a plan up to 2050 would provide certainty and enable strategic - decisions about Green Belt boundaries to be made, it is unclear at this stage how - sufficient evidence and certainty over such a long timeframe would be prepared. For - instance, it would be very difficult for the University to articulate with a high degree of - certainty what specific development needs it would require in 2050 largely owing to the - competitive market it operates within and the need to adapt to other external forces such - as Government policy. - - In the circumstances, WLBC may wish to consider adopting a ‘hybrid approach’ as - recommended by the HBF7. This could include identifying sufficient allocations to meet - the needs in full over the period between 2012 and 2037, whilst also identifying - sufficient safeguarded land and other potential future sources of supply to ensure that - the Green Belt boundary endures until at least 2050. Such an approach would be - consistent with national policy which requires LPAs, when reviewing Green Belt - boundaries, to consider their intended permanence in the long term so that they are - capable of ensuring beyond the plan period8. - - Whichever option WLBC chooses to progress with, it will be important that the new - Local Plan provides triggers to enable it to be reviewed at appropriate opportunities, and - provide sufficient flexibility to adapt to rapid change during the plan period, in - accordance with the Government’s presumption in favour of sustainable development9.	Noted
74	Standard Plan Period. A longer term plan could potentially pull focus from the short term and immediate needs. A clear strategy for a significantly longer period of time would be difficult to define and may become unfocused and ineffective in its delivery. - - For comparison, if such a plan period was due to end today in 2017, that plan period would - have begun in 1979. Providing a clear focused planning strategy for such a long time period is unlikely to be effective.	Noted
75	We welcome the option to extend the Local Plan period to 2050 as this could contribute to achieving wider strategic economic and regeneration objectives, such as the regeneration of Skelmersdale. This would also support Lancashire County Council’s long-term ambitions, particularly with regard to the delivery of public health, infrastructure and transport interventions.	Noted
76	If the Council seeks the longer plan period policies will need to be flexible enough to enable the development industry to respond to changing circumstances, which are highly likely given the current uncertain economic and political climate we are in, both locally and nationally. As such a shorter Local Plan period is considered to be more appropriate. -	Noted

ID	Representor Comments	Council Response
	Any Local Plan subject to the longer term should make allowances for an early review, should the Plan become out of date.	
77	Standard plan (option1)	Noted
78	Standard (option 1)	Noted
79	<p>The Strategic Development Options Paper considers two time periods for the Local Plan - (Option I: 2012 to 2037 and Option II: 2012 to 2050), both of which have a base date of 2012 to - correspond to the base date of the Strategic Housing and Employment Land Market - Assessment (SHELMA). Paragraph 1.1.5 of the Strategic Development Options Paper advises - that “while the West Lancashire Local Plan 2012-2027 is not out of date at his point in time, it is - considered prudent to begin work on a Local Plan Review with the aim of preparing a new - Local Plan, especially given that the gathering and review of all evidence, the preparation of a - Local Plan and the Examination of the final document by a Planning Inspector can, all together, - take several years” (emphasis added). Story Homes therefore have significant concerns that the - base date of 2012 will be out of date at the time of adoption of the Local Plan Review and - therefore will not provide a sound base to ascertain West Lancashire’s development needs - throughout the whole of the Local Plan Review plan period. As set out in response to the Local Plan Review’s proposed spatial distribution of development, - Story Homes consider that an approach which sets out an alternative spatial distribution - strategy to that in the adopted Local Plan should be taken forward. The Council’s Annual - Monitoring Reports for the period 2012 to 2016 identify a cumulative delivery shortfall of 258 - units (against an annual target of 302 units for the period 2012-2017, following which the target - increases to 335 through to 2027), therefore raising concern that the current development - strategy is not facilitating development within the areas where the market wants to see - development. Story Homes have fundamental concerns about the adopted Local Plan’s reliance - on Skelmersdale to meet housing needs; this is expanded upon further within the response to - the proposed spatial distribution of development. Story Homes, therefore, question the appropriateness of the Local Plan Review having the - same start date as the adopted Local Plan when the Local Plan Review is intended to be a - standalone, replacement, Development Plan Document. The adopted Local Plan has been - guiding development over the last 5 years and therefore to ensure that the right level of - development is allocated to the most appropriate locations, an updated SHELMA evidence base - is imperative. - Notwithstanding the above comments, and focusing specifically on the length of time which the - Local Plan Review should cover, Option 1: 2012 to 2037, would be Story Homes’ recommended - time period. Local Plans must generate the confidence that they are planning sustainably over - the full plan period and Story Homes are unconvinced that this could be achieved through a - Local Plan which sets a Plan period of approximately 35 years. It is important that the Local - Plan should incorporate safeguarded land in accordance with paragraph 85 of the NPPF, which - identifies that where necessary, local authorities should identify such land to meet longer-term - development needs stretching well beyond the plan period. Where safeguarded land is already - identified this should be considered for allocation in preference to the release of further - Greenbelt land in accordance with guidance contained within the new Housing White Paper - (para 1.39) which states that Councils should only allocate Green Belt land after ‘they have fully - examined all other reasonable options for meeting their identified development requirements.’ - Furthermore, the longer plan period is unlikely to be able to provide an approach which will be - sufficiently flexible to take account of changing market conditions, or changes to OAN over the - length of the plan period.</p>	Noted
81	Standard Plan Period - Option 1 : 2012-2037 - - Based on the lack of vision	Noted

ID	Representor Comments	Council Response
	<p>for the Borough contained within the Issues and Options Paper and taking into consideration the comments above, i.e. imbalanced approach to housing and employment development focused solely on the southern areas of the Borough, lack of support for agricultural and food processing economy and exclusion of any infrastructure or support for the Northern Parishes, in our view the emerging Local Plan can only be for the period 2012 - 2037. - - Paragraph 157 of the NPPF advocates an appropriate period of 15 years, to ensure a local plan remains up to date and takes account of longer term requirements. - - Based on the LPA's vision and objectives set out in this paper, both the Borough's immediate and future needs have failed to be taken into consideration, and so it is strongly objected against a period of 50 years. - - Several key strategic sites have failed to be delivered in the existing local plan, and therefore it is imperative that a regular review mechanism, is incorporated into any local plan, to ensure that any changes can be planned in a sustainable manner.</p>	
82	<p>Option II ties in with the The Climate Change Act which aims to reduce UK carbon emissions so that in 2050 they are at least 60 per cent lower than the 1990 baseline.</p>	Noted
84	<p>Persimmon Homes has concern over the longevity of projections and evidence considered and - produced currently across a plan period greatly in excess of the more standard 15 year approach. - Persimmon understands that the Authority wishes to provide as great a possible period of - permanence in relation to development land provision and in particular greenbelt across the - Borough. Care should be taken however that the Authority are not leaving themselves open to - challenge as local and regional evidence bas change over time, leaving a pre-determined and - inflexible Local Plan I Locational Strategy outdated. - - In part, the changing nature of demographics and economics can be seen in this early review of - the current Local Plan adopted only 3 years ago.</p>	Noted
85	<p>We consider it a little early to be commencing a new local plan so soon after the one currently supposed to run from 2012-2017. - - There appear to be two main issues in this Options paper, firstly how many houses are required and we consider this should match the projected population in West Lancs which would mean a requirement for 300 per year and 3/4 hectares of land for employment land. - - We consider that the plan should run for the shorter period to 2037 as any later time would subject Green Belt land to greater threat and with changes in farming practices there could potentially be little need to release further green belt and reliance should be placed on Brown field sites for development.</p>	Noted
87	<p>The local plan should be for a shorter period. There are many external factors that may affect future development and the longer plan period would limit WLBC's ability to be flexible.</p>	Noted
89	<p>West Lancashire are considering two time periods for the Local Plan. The first is a plan period of 25-years (2012 to 2037) and the second is a 38-year plan period (2012 to 2050). - The NPPF recommends that a local Plan should cover a Plan period that lasts at least 15 years from the anticipated adoption date. West Lancashire identify within paragraph 1.2.3 that it is likely that the Local plan review would be adopted towards the end of 2019 or start of 2020, a local plan for 15 years would equate to 2035. - The option for up to 2037 aligns with the forecast period for SHELMA and meets the requirement of the Framework to allow for a plan period of at least 15 years. This Option is supported by our Client as this time-line has been forecasted and subsequently the amount of development to be delivered is realistic and will likely meet the needs of West Lancashire's existing and future residents. - The second Option would comprise a plan period up to 2050, and is not supported by our Client. This would delay the process further as West Lancashire would need to review whether the requirements to 2037 should continue to 2050 or if the needs should change. It is unlikely that the needs post 2037 can be accurately forecasted</p>	Noted

ID	Representor Comments	Council Response
	<p>given the changing demographics in the Borough. This Option could therefore result in West Lancashire failing to meet the needs of future generation. - Our Client supports the option whereby the Plan period runs to 2037 and land is released from Green Belt to meet immediate needs and safeguarded land is also identified now to meet needs post 2037. This would be the only sound approach and would accord with Paragraph 83 of the Framework which states: - "Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the longer term, so that they should be capable of enduring beyond the plan period." - Paragraph 85 also requires the Council to satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. Safeguarding land for a significant period post 2037 would potentially mean that the Green Belt boundary could endure for a significant length of time without the need for further review. This would also ensure that West Lancashire would be able to meet their housing and economic growth targets as there would be further development options if strategic sites fail to deliver. -</p>	
95	<p>3.28 The SDOP suggests two potential plan periods: - • 2012 to 2037 - • 2012 to 2050 - 3.29 Both options would meet the minimum period for a Local Plan (15 years) from the anticipated date of adoption in 2020 and would align with the forecast period adopted in the SHELMA work. WLBC's willingness to consider the second longer-term option is welcomed and would provide a degree of certainty to both the development industry and the local community about the development strategy for the Borough. However, there are additional challenges associated with establishing robust development forecasts over such a period and, in the event that this approach is pursued, WLBC would need to satisfy itself that the Local Plan Review incorporates sufficient triggers to review the success of the development strategy at regular intervals. - 3.30 WLBC could consider a hybrid of the two options. This could involve: - • Establishing a Local Plan for the period 2020 to 2040, providing a 20-year plan period; and - • Identifying sufficient safeguarded land to accommodate additional needs up to 2050. - 3.31 This would balance the need to provide certainty with the inherent uncertainties of establishing a Local Plan which lasts longer than 20-years, given the lack of robust demographic and economic forecasts beyond this timeframe. In any event, the Local Plan Review must include similar triggers to those in the current Local Plan, which enable the delivery of 'Plan B' sites in the event that the delivery of new development falls short of expectations as it has in recent years (see below).</p>	Noted
96	<p>In our experience it is particularly difficult for a planning authority to accurately project future planning needs beyond a more typical Local Plan period, and on that basis we see no proper requirement for the Council to dedicate resource to taking forward a Plan period akin to Option II. There are urgent requirements which should be addressed at the earliest opportunity, and a longer Plan period may well discourage that early delivery to be promoted and delivered in practice.</p>	Noted
97	<p>In our experience it is particularly difficult for a planning authority to accurately project future planning needs beyond a more typical Local Plan period, and on that basis we see no proper requirement for the Council to dedicate resource to taking forward a Plan period akin to Option II. There are urgent requirements which should be addressed at the earliest opportunity.</p>	Noted
98	<p>The NPPF recommends that a Local Plan should cover a Plan period that lasts at least 15 years from the anticipated adoption date. In the interest of</p>	Noted

ID	Representor Comments	Council Response
	<p>providing greater certainty to residents and developers, and in order for the Council to make more long term strategic decisions, McDermott generally welcomes the proposed Plan period extending to 30 years or until 2050 (Option II). However, support would be predicated on the right level of sites being identified and suitable flexibility being introduced through safeguarded/ buffers sites to ensure deliverability. Above and beyond this, it would be expected that the Council would introduce a mechanism whereby if delivery fell below a certain point additional sites could come forward for development (i.e. below a year housing land supply). - - In terms of the evidence base provided it is considered that a full detailed Green Belt and Landscape Assessment is required to inform the decision making process. This is especially important in West Lancashire given the highly constrained nature of the settlements which are surrounded/ washed over by Green Belt designations.</p>	
99	<p>It is our Clients' view that if the Council is seeking to deliver an ambitious Plan, which we consider it should, then the Council should extend the Plan period to 2050, rather than 2037. This will help to realise the longer term potential for growth and development with Skelmersdale. However, this would be dependent on whether sufficient land is released i.e. greater than 400 dpa. If this is the case, a longer Plan period may be appropriate. However, there remains a number of unknowns associated with this, in particular, the lack of reliable projections for both housing and employment need over the plan period. It is important if the Council progresses with a longer Plan period, that any allocations are deliverable, suitable and available, and will help achieve the Plan requirements, both in the short and long term. Our Clients would recommend that the emerging Local Plan includes safeguarding land for the post 2037 period. It should include a mechanism within the Plan which triggers an early review or land release if the Council fails to deliver the level of housing required i.e. when housing delivery is significantly below the anticipated level (for circa 1-3 years), and if this is due to a lack of land supply, a partial or full Plan review will be undertaken. We support the Council's position that they would need to review the evidence base in light of the revised Plan period, because it will have been largely based on a shorter Plan period.</p>	Noted
108	<p>Option 2, sustainable options need long term thinking. The decisions made need to be right for our grandchildren.</p>	Noted
111	<p>West Lancashire are considering two time periods for the Local Plan. The first is a plan period of - 25-years (2012 to 2037) and the second is a 38-year plan period (2012 to 2050). The NPPF recommends that a local Plan should cover a Plan period that lasts at least 15 years - from the anticipated adoption date. West Lancashire identify within paragraph 1.2.3 that it is likely - that the Local plan review would be adopted towards the end of 2019 or start of 2020, a local plan - for 15 years would equate to 2035 The option for up to 2037 aligns with the forecast period for SHELMA and meets the requirement - of the Framework to allow for a plan period of at least 15 years. This Option is supported by our - Client as this time-line has been forecasted and subsequently the amount of development to be - delivered is realistic and will likely meet the needs of West Lancashire's existing and future - residents. The second Option would comprise a plan period up to 2050, and is not supported by our Client. - This would delay the review process further as West Lancashire would need to review whether - the requirements to 2037 should continue to 2050 or if the needs should change. It is unlikely - that the needs post 2037 can be accurately forecasted given the changing demographics in the - Borough. This Option could therefore result in West Lancashire failing to meet the needs of future - generation. Our Client supports the option whereby the Plan period runs to 2037 and land is released from - Green Belt to meet immediate needs and safeguarded land is also identified now to meet needs - post 2037. This would be the only sound approach and would accord with Paragraph 83 of the - Framework which states: - "Local</p>	Noted

ID	Representor Comments	Council Response
	<p>planning authorities with Green Belts in their area should establish - Green Belt boundaries in their Local Plans which set the framework for Green - Belt and settlement policy. Once established, Green Belt boundaries should - only be altered in exceptional circumstances, through the preparation or - review of the Local Plan. At that time, authorities should consider the Green - Belt boundaries having regard to their intended permanence in the longer - term, so that they should be capable of enduring beyond the plan period.” Paragraph 85 also requires the Council to satisfy themselves that Green Belt boundaries will not - need to be altered at the end of the plan period. Safeguarding land for a significant period post - 2037 would potentially mean that the Green Belt boundary could endure for a significant length - of time without the need for further review. This would also ensure that West Lancashire would - be able to meet their housing and economic growth targets as there would be further development - options if strategic sites fail to deliver.</p>	

Question 11: Are the proposed spatial areas appropriate? If not, how should the Borough be divided up to help identify where development should go?

ID	Representor Comments	Council Response
1	Development should be spread all over west Lancashire - not everyone wants to live in Skelmersdale..people who were - brought up in parbold want to live in that area.and that goes - for Croston Ormskirk wrightington and so on.	The Local Plan will seek to ensure each area of the Borough is able to accommodate some new development to meet local demand / need, but this can be quite challenging in some locations due to the nature of constraints to development in those areas. As such, it can be hard to find suitable sites in places like the Eastern Parishes.
2	Self building in all areas should be considered as people want to live - were there families are	Noted - self build will always be an option where residential development is permitted, but the Council acknowledges that it can be challenging for a self-builder to buy an appropriate site at an affordable value and will explore ways in which the Council can help identify suitable sites.
9	Skelmersdale is an entity all to itself. A new build "town" with no infrastructure, services or culture. It is deeply inappropriate that historic UpHolland and other surrounding areas are lumped in with this planning, economic and social disaster zone. Everything east of Skelmersdale should come under the "Eastern Parishes" area.	Noted. The spatial areas merely reflect where areas have connections in terms of residents travelling to access services. The individual identity of each settlement within those areas is still recognised and maintained.
14	I agree	Noted
18	No Comment.	
20	Too complex an issue for us to address in detail. However Ormskirk is a well established market and university town which does not make it a realistic fit with Aughton which is a semi rural residential village with its own history and characteristics. .	Noted. The spatial areas merely reflect where areas have connections in terms of residents travelling to access services. The individual identity of each settlement within those areas is still recognised and maintained.
21	No. Use brown field sites only.	See comments above
23	Yes	Noted
24	The subdivisions seem to make sense by the way of communities with different needs and attitudes.	Noted
26	This appears to be appropriate	Noted
28	The spatial areas as depicted do not reflect the current and historical position of Up Holland in relation to Skelmerdale. - The needs and character of Up Holland are very different to those of Skelmersdale and have more in common with the South Eastern Parishes and we cannot understand why the village of Up Holland is joined to Skelmersdale. - There is no shortage of housing in Up Holland village and in recent years Up Holland has been over-developed with many new housing estates at the expense of the environment.	Noted. The spatial areas merely reflect where areas have connections in terms of residents travelling to access services. The individual identity of each settlement within those areas is still recognised and maintained.
30	Newburgh and Parbold should be included within the proposed Skelmersdale and South Eastern Parishes area. - I live in the ecclesiastical Parish of Dalton	Noted
31	Proposed spatial areas are appropriate.	Noted
32	I believe so.	Noted

ID	Representor Comments	Council Response
35	The identified spatial area of Burscough and the Central Parishes is considered to be appropriate. At this stage, we have no further comments on this.	Noted
39	- Response A– Yes -	Noted
40	We generally agree with the spatial areas, it is common sense for the higher levels of growth to be directed towards the Key Service Centres that are generally more accessible and therefore sustainable. However, the approach outlined should not preclude sites from coming forward in other areas if it is demonstrated that they suitable development sites – for example, this could include PDL sites within the Green Belt that are not directly connected to a settlement, but nonetheless given their location to other settlements would be appropriate.	Noted
42	We have no strong views on this matter, which is peripheral to our core charitable remit.	
46	The proposed sub-division of the Borough is an improvement on the previous arrangements as it reflects a more realistic picture of how the settlements interact with each other.	
48	We don't have enough information to make an informed judgement. However, using the outlined plan seems reasonable given that existing brownfield sites are used with the parameter that there is existing transport, commercial and social services to support the development.	Noted
50	<p>The Topic Paper presents newly defined spatial areas for the Borough, which are considered to - better reflect how the different areas of the Borough function. The majority of the population of the - Borough is concentrated in three of the six Spatial Areas: Skelmersdale and the South-Eastern - Parishes; Ormskirk with Aughton; and Burscough and the Central Parishes. - This variable presents 4 scenarios for the distribution of employment and housing land within - these newly defined spatial areas: -</p> <ul style="list-style-type: none"> - ☐ Scenario 1: the existing pattern of household and employment land distribution; - ☐ Scenario 2: a focus on the key service centres; - ☐ Scenario 3: a focus on rural communities; and - ☐ Scenario 4: a focus on growing Skelmersdale in particular. - <p>- For Highways England, the crucial aspect of any scenario is the potential impact on the - safety and operation on the SRN. Highways England will look to encourage patterns of - growth that minimise the need to travel and promote the use of sustainable modes. This - does not, however, mean that patterns of growth should be promoted solely on the basis of - minimising travel on the SRN, nor should this preclude the encouragement of development - that seeks to capitalise on the connectivity of the SRN, provided that it can be - demonstrated through evidence that these sites can be safely and sustainably - accommodated by the SRN (any resulting requirement for improvements / capacity - enhancements necessary improvement works being identified for inclusion within the authority's - Infrastructure Development Plan). - It stands to reason that locating a greater proportion of employment land and dwellings in close - proximity to the SRN and popular commuter destinations (e.g. Liverpool, St Helens, or Wigan) - could increase vehicular demand for the SRN, as opposed to locating development sites in the - rural areas, which are a considerable distance from the SRN. - However, the precise impacts of proposed site allocations will be dependent on a number of other - factors, such as use class, proportion of affordable housing, policy support and masterplanning for - sustainable and active travel, sustainable interventions (for example, a new rail station at - Skelmersdale) and the proximity of employment and facilities. - It is also noted that under the postulated scenarios whereby West Lancashire looks to - accommodate an under-provision of large-scale logistics employment usage from neighbouring - authorities, these are likely to require locating in close proximity to the SRN and have a potentially - significant impact. -</p> <p>- Key Points - ☐ The Strategic Development Options presented in the Strategic Options Topic Paper present - significantly different variables in terms of</p>	Noted

ID	Representor Comments	Council Response
	<p>the amount of development intended, the location - for development, and even the length of the plan period. In this context, it is difficult to - draw conclusions on the expected impacts of each variable or on the combination of - variables. - <input type="checkbox"/> Nevertheless, certain options present a significantly higher potential for impacts on the - SRN, and were the option to accommodate the unmet requirements of the LCR to - materialise, then these impacts could be significantly higher. - <input type="checkbox"/> Rather than press the Council toward one option or the other, Highways England looks to - work proactively in partnership with West Lancashire Borough Council towards assessing - the implications for the SRN of all likely scenarios as these are determined. - The Location of New Development - This chapter presents four options for the precise location of development within the newly defined - Spatial Areas. These options can be summarised as: - <input type="checkbox"/> Prioritising infill developments and building higher within the existing settlements; - <input type="checkbox"/> Locate new development adjacent to existing settlements; - <input type="checkbox"/> Create brand new settlements; and - <input type="checkbox"/> Entirely restrict new development in areas at risk of flooding. - It is noted within the Topic Paper that these options are not necessarily mutually exclusive. - As identified in the commentary presented in the Options Paper, locating new development - adjacent to existing settlements is likely to be the most cost effective approach to creating - sustainable developments, by maximising the use of existing sustainable and active travel - infrastructure without the loss of green and open space associated with Option 1. - However, there are merits to each option, especially were the Council to adopt a longer plan - period and select a variable for a higher level of development. In this instance, it may be more - appropriate to consider all available options, as the potential for growth may exceed the available - capacity for infill or require interventions that are not cost-effective. - Highways England encourages site allocations to be located where there are realistic - options for sustainable travel and to minimise private car usage. Through the development of - the Local Plan and the accompanying transport evidence, the potential for usage of these modes - is expected to become better understood. - At this stage, while it is less likely that development in rural areas will be able to achieve modal - splits comparable with urban areas, these options should not be immediately discounted or - discouraged until feasibility work on potential locations has been undertaken. - - Key Points: - <input type="checkbox"/> Highways England supports any potential site allocations that can reasonably promote - sustainable travel patterns. This is more likely to be those that are located near to existing - urban areas with good sustainable and active travel connectivity. - <input type="checkbox"/> Where areas are considered for potential site allocations, studies should be undertaken to - assess the likelihood of sustainable travel usage and the potential for cost-effective - interventions. - Site Allocations - The Topic Paper includes a further call for sites, with details of requirements for supporting - information. At this stage of the Local Plan process there are no proposed sites to comment upon. - Providing Infrastructure and Services - This section of the Topic Paper offers high-level commentary on the potential impacts of the - distribution of development on existing infrastructure, and potential future requirements as a - consequence. - There is no discussion of the SRN within the Options Paper. However, it should be noted that - the M58 could be considered to be under-capacity, although not without localised - congestion and operational issues at a number of junctions, particularly at each terminus.</p>	
54	<p>Issue 3 seeks opinion on the distribution of new development, with Scenario 3 focusing on rural communities and seeking to allocate more new development to the rural areas. - We strongly support the ambitions of scenario 3 in enabling rural areas and the smaller villages, in particular Wrightington, to become more sustainable and reduce the burden of new development on the Borough's towns.</p>	Noted
56	<p>The spatial distribution of development should assist in the creation of sustainable patterns of development in accordance with national guidance</p>	Noted

ID	Representor Comments	Council Response
	<p>and this should be one of the key determinants of the locations and sites identified for development. - In order to ensure a robust and flexible Local Plan and ensure that the Council is able to demonstrate a deliverable 5 year supply of housing land throughout the life of the plan, it is important that the spatial distribution of development allows all sites identified for development to conform with the deliverability criteria set out in footnote 11 of the Framework [§47]. - With regard to the four scenarios for distributing new development in the new Local Plan set out in the SDO Paper. Scenario 1 would see new development distributed according to the current distribution of existing housing and employment land. Scenario 2 would see most development directed towards the 3 'key service centres' (and less to rural areas) with Scenario 3 the opposite (more development to rural areas). Scenario 4 is a variation on Scenario 2 which would see the development in the key service centres more weighted towards Skelmersdale. - Taylor Wimpey does not have a strong preference at this stage for any of the 4 scenarios set out but notes that the Council must ensure that the long term sustainable growth of all settlements in the Borough is supported through the Local Plan. - The SDO Paper states that under Scenario 2, up to 90% of new development would be distributed to the three key service centres. Distributing this much development to the key service centres could potentially threaten the long term growth of the Borough's other sustainable settlements, particularly the 'Key Sustainable Villages' and 'Rural Sustainable Villages' identified in the adopted Local Plan. Therefore distributing 90% of development to the Key Service Centres is considered too high particularly in the context that the adopted Local Plan distributes 76% of development to the Key Service Centres. - The SDO Paper states that Scenario 3 is 'the opposite' of Scenario 2 [§3.4.9] and would be: - "...appropriate if it was considered that rural areas need to be grown in order to make them more sustainable and to reduce the burden of new development in the Borough's towns". - Taylor Wimpey welcomes that the Council is considering distributing more development to rural areas which is the most sustainable option. In this context, Taylor Wimpey does not wish to make detailed comments on but generally supports the definition of the spatial areas set out in the Spatial Portrait Paper [SP Paper]. The adopted Local Plan distributes development in rural areas by spatial area (i.e. Northern Parishes, Eastern Parishes and Western Parishes). In the new Local Plan, rather than broadly distributing development outside of the key service centres this way, the Council should consider specifying the level of development in identified sustainable rural settlements (e.g. Appley Bridge) where sustainable growth is necessary. - In summary, whilst the focus of new development in the new Local Plan may be the key service centres, the Council must ensure that the sustainable growth of other settlements in the Borough is adequately supported by distributing an appropriate level of development to the more rural areas.</p>	
57	<p>The detail of the sub-division of the borough is almost entirely irrelevant. What matters is that each community should be allowed to develop in an appropriate manner.</p>	Noted
64	<p>Our Clients' support the Council's approach in terms of the distribution of the spatial areas. However, it is our Clients' view that the location for Green Belt release should be identified within these spatial areas.</p>	Noted
67	<p>see attached submissions</p>	Noted
69	<p>Possibly, but this issue is a supporting factor to the crucial question 12 below. The principle for any significant development should be that it takes place primarily within existing brownfield sites, and only where the resources - transport infrastructure, public transport/health/social/educational services and facilities, utility supplies and infrastructure, commercial facilities to meet daily needs - exist.</p>	<p>Noted, although, in relation to brownfield land, all those developable brownfield sites in West Lancashire have been identified through the Council's Brownfield Land Register, and the supply of development they can provide will be accounted for in the Local Plan. However, this will not be sufficient to meet the development needs of West</p>

ID	Representor Comments	Council Response
		Lancashire and as such, some greenfield land will be required as well.
70	Whilst the Commissioners do not have any specific comments about the spatial areas - identified, there should be an acknowledgement regarding the synergy and connections - between these areas. For instance, the Western Parishes clearly have linkages with Ormskirk - and Aughton and can help support the growth of these settlements. They also have linkages - to settlements in the neighbouring authority of Sefton (relevant to the Duty to Cooperate) and - the possibility to accommodate some of Sefton's future housing needs in line with the longer - plan period suggested through this consultation document (which goes beyond the current - plan period of the adopted Sefton Local Plan).	Noted
72	I think that Appley Bridge should be taken out of the eastern parishes as it naturally conjoins with Wigan rather than West Lancashire	Noted, although Appley Bridge is part of the Parish of Wrightington.
73	The University agrees that the broad Spatial Areas identified by the Council appear - appropriate. However, it will be important to recognise that these areas do not operate - independently and a number of themes will require consideration at the Borough-wide - level.	Noted
75	Whilst we agree that a 'blend' of the four scenarios would be the most sustainable, we welcome Scenario 4 and a focus on growing Skelmersdale. This would support Lancashire County Council's ambitions to provide a new rail station and public realm improvements to Skelmersdale town centre.	Noted
77	The larger development should be where infrastructure is more prevalent - e.g. Skelmersdale.	Noted
78	Small mixed development in villages - affordable for locals only. Larger where there is good infrastructure as in Skelmersdale.	Noted
81	Broadly support the Spatial Areas and consider appropriate in terms of boundaries. - - We reserve the right to comment further on the importance in terms of these Spatial Areas hierarchy in terms of housing and employment distribution.	Noted
82	Development should be on existing brownfield sites and where there is an existing infrastructure and facilities to support it i.e. transport, commercial land, and services (schools, social services, healthcare).	Noted, however, the remaining available brownfield land will not be sufficient to meet the development needs of West Lancashire and, as such, some greenfield land will be required.
87	Burscough Parish Council supports a focus on developing Skelmersdale. If Skelmersdale is going to improve it needs lots of help, and further housing will support an improved town centre offer: these should go hand in hand. Ormskirk is now out of balance and is dominated by the college and its town centre is failing. More housing, particularly on the south side of Ormskirk would boost the town centre and create a more balanced community. New residents are more likely to work in Merseyside and locating new homes in the south of the borough or close to the motorway network makes most sense because it has the least impact on the road network. Burscough is set to grow massively over the next decade. Faster growth may de-stabilise what is currently a fairly healthy community.	Noted
89	Section 3.4 of the Options Paper provides 4 differing scenarios for spatial distribution across West Lancashire. -	
95	The Topic Paper proposes a new definition of Spatial Areas to inform any LP review. The new definition reaffirms that Ormskirk with Aughton continues to be identified together. BDW supports this approach. Most of the built development in the Aughton parish forms part of a continuous urban settlement with Ormskirk and we would agree with WLBC's suggestion that Aughton now effectively performs as a 'suburb' of Ormskirk.	Noted

ID	Representor Comments	Council Response
96	<p>AIUH is generally supportive of the proposed Spatial Areas. It will however be important to ensure that if it is recognised that housing delivery in Skelmersdale itself is challenging, then allocations should be made in other parts of the Spatial Area which provide stronger prospects of substantive contribution to the unmet needs for affordable housing, market housing and accommodation for older people. Sites in and adjacent to the Upholland development limit are the obvious next consideration, and this site is particularly well-placed to provide a substantial contribution to housing supply and also meet other planning objectives.</p>	Noted
97	<p>St Modwen makes no comment on this matter.</p>	
98	<p>In terms of the distribution of development requirements across the Borough, McDermott Homes broadly supports scenario 2 which seeks to focus new development in and around the Key Service Centres of Skelmersdale, Ormskirk with Aughton and Burscough so, for housing, the areas encompassing these towns take a larger proportion of new housing development (perhaps as much as 90% in total) while the rural areas take less. - This is considered to represent the most sustainable approach to delivering housing in West Lancashire. As detailed in the Spatial Portrait Paper (February 2017) Ormskirk with Aughton benefits from good transport links to surrounding areas, with a fifteen minute frequency electric rail service to Liverpool and a less frequent diesel service to Preston. A number of bus routes converge at Ormskirk Bus station, connecting to Liverpool, Southport, Preston and Wigan. The M58 Motorway can be accessed 3km south east of the settlement, and the A59 provides good north-south road links, whilst the A570 provides north west-south east links. - Aughton is one of the most affluent areas of the Borough with good market demand but does have issues over affordability. The settlement provides a number of services and facilities for its residents. Overall, it is considered that designating new housing allocation(s) around Aughton would contribute to achieving the Council's overall vision for the Borough and would contribute to addressing current issues of affordability/ downsizing challenges.</p>	Noted
99	<p>Our Clients' support the Council's approach in terms of the distribution of the spatial areas. However, it is our Clients' view that the location for Green Belt release should be identified within these spatial areas.</p>	Noted
111	<p>Section 3.4 of the Options Paper provides 4 differing scenarios for spatial distribution across West - Lancashire. Scenario 1 seeks to spread new development around West Lancashire in accordance with the - current distribution of existing households and employment land. This option effectively continues - the current situation in terms of the proportionate size of settlements in West Lancashire and the - availability of local employment opportunities. Our Client does not support this spatial distribution option as it is deemed to be unsustainable. - Paragraphs 3.4.5 and 3.4.6 of the Strategic Options Paper identifies some of the concerns - associated with this option by stating: "However, when the distribution of employment land, in particular, is - considered, the current spread of employment opportunities from offices, - industrial units and warehousing is extremely skewed towards Skelmersdale - and the South-Eastern Parishes, with the Borough's second largest settlement - (Ormskirk with Aughton) making a negligible contribution (although there are - of course many other types of employment opportunity in Ormskirk). - Likewise, in relation to housing distribution, simply maintaining the same - proportionate distribution going forward does not necessarily reflect the - most sustainable approach as it could mean that some settlements have to - take more development than their existing infrastructure, services and - environment can practically cope with and/or that other settlements take less - development than they could otherwise cope with." We agree with the concerns outlined by West Lancashire; it is vital that future housing and - employment development is provided in locations which are</p>	Noted

sustainable. The distribution of too - much housing to Skelmersdale and the south-eastern parishes may not be viable and may result - in serious under-delivery of housing across the plan period Scenario 2 seeks to focus new development in and around the Key Service Centres of - Skelmersdale, Ormskirk with Aughton and Burscough. Paragraph 3.4.7 indicates this could be - as much as 90% of the overall housing distribution to be located within these settlements. A - further difference between scenario 1 and 2 is that Ormskirk with Aughton would take a much - larger share of new employment opportunities. This Scenario is supported by our clients, as locating housing within existing key service centres - is the most sustainable option. The sustainability credentials of this proposed Scenario are - recognised within paragraph 3.2.8 of the Strategic Options Paper which states: - "This scenario essentially adjusts the historic pattern of development in - Scenario 1 to make it more sustainable by locating more new development - around the Key Service Centres (which have more key infrastructure) in a - broadly proportionate way, though not entirely removing the historic patterns. - This is especially the case for employment land where Skelmersdale and - Burscough still have a larger share than their populations might ordinarily - justify." Our Client supports the delivery of development within accessible locations as this will - significantly improve the sustainability of proposed developments, increase the viability of existing - services and seek to provide improvements in locations where the benefit will be experienced by - the most people. Scenario 3 is the opposite to scenario 2 and seeks to allocate more land within the rural areas. - It is identified within paragraph 3.4.10 that this scenario could be partially met by creating a new - village, whilst the focus would generally be on the rural areas in the Northern Parishes. Provision of housing on a large scale within the Northern Parishes would require vast - infrastructure improvements which could render development unviable. However our client has - identified a need for appropriately scaled provision of specialist elderly accommodation within - these areas. Towns such as Skelmersdale, Ormskirk with Aughton and Burscough are all well connected by - both road and rail to the wider region which is why existing businesses have located here. - Locating significant amount of housing development in locations away from these centres without - significant transport improvements would result in the perpetuation of unsustainable - transportation methods. If infrastructure improvements are required these should also be located where the most benefit can be realised. Our Client does not support this option; this would not meet the immediate needs of the Borough as delivery of a Strategic Village would require significant levels of new development which takes time. Hourigan Connolly Completed a Study in Respect of the Delivery of Urban Extensions for - Gladman Development Limited. This study compared Sustainable Urban Extensions of sites of - 500 dwellings upwards from all over the country. The Study identified the following timescales in - terms of delivering development: - ☐ Achieving an allocation takes on average 8 to 10 years - ☐ Obtaining outline planning permission takes an average 34 months from - submission to approval. - ☐ Agreeing planning obligations takes an average 23.6 months from - resolution to grant to issuing of the decision notice. - ☐ Achieving reserved matters planning permission takes an average of 6 to - 9 months from submission to issuing of the decision notice. The report surveyed several House Builders and undertook significant discussions with developers, which provided an average annual delivery rate of 30-35 dwellings per annum per single housebuilder. This information clearly indicates that from the point of achieving an allocation it is reasonable to - assume it would take a developer approximately 5.5years to achieve a start on site. In addition to the lack of immediate delivery, there would be a significant amount of additional - costs associated with development where there is a lack of existing key infrastructure. This could - render development in the rural areas unviable Scenario 4 is a variation of scenario 2 with the exception that more development is required from Skelmersdale than the other Key Service centres. This is not supported by our Client, as skewing development towards Skelmersdale is not viable. - The adopted

ID	Representor Comments	Council Response
	<p>Community Infrastructure Levy (CIL) charging schedule allocates a zero rate to - Skelmersdale to render development in this location deliverable. Delivering a greater amount of - development in Skelmersdale will not provide the affordable housing and infrastructure the - Borough needs for growth. Table 5.27 of the Annual Monitoring Report (AMR) 2016 identifies that only 20% of development - allocated to Skelmersdale has been delivered since 2012. This is significantly below the 43.2% - target allocated to the settlement within the adopted Local Plan. This therefore demonstrates that - the adoption of Scenario 4 would not be positively prepared and the sites would risk being deemed - undeliverable when assessed against the definition provided in Footnote 12 of the Framework.</p>	

Question 12: Which scenario for the distribution of housing and employment land requirements around the Borough is most appropriate? Why? Would you prefer a completely different option or distribute development differently in anyway?

ID	Representor Comments	Council Response
1	Spread the development over west Lancashire - 98 percent green belt there is massive potential -	Noted
2	All development across West Lancashire small and large not everyone - wants to live in Skelmersdale	Noted
9	As much as I would like to plump for option 4, the fact is that Skelmersdale is beyond reprieve- people don't want to live there given its well earned and dire reputation- so mass building of houses would be futile. The fairest option would seem to be to spread new development around in proportion to the size of existing towns and villages, although again, I cant stress enough that greenbelt should not be touched.	Noted
14	scenario 2, because you are providing what is wanted not what you think people need, that is to live in burscough, skem, and Ormskirk.	Noted
18	McCarthy & Stone recognises the need to plan for housing delivery quantitatively but is more concerned as with the qualitative aspect of housing delivery i.e. ensuring that the right mix of housing is delivered to meet the diverse needs of all residents, particularly the elderly.	Noted
20	Out of the 4 options....Scenario 4 is the preferred option. However an alternative proposal is the building of affordable houses in Ormskirk Town Centre which would aid in its rejuvenation.	Noted
21	Yes. We do not need housing and employment land. We need to produce more food not less. The population is increasing.	The evidence suggests that new development is required both nationally and in West Lancashire, not least because the population is still increasing, but also because of other demographic changes in household sizes and numbers. However, the Council recongises that food production is also important, and so the right balance must be struck to ensure the majority of farmland is still available to grow crops.
23	Scenario 1. An even spread of development will have the least impact on pre-existing settlments while allowing each area to expand in a natural manner.	Noted
24	Any new development should take place OUTSIDE green belt sites. Any development should be served by existing services such as transport, health services, education etc ect. Scenario 4 seems to be the best option	Concerns noted. However, the supply of new development that can be provided outside the Green Belt will not be sufficient to meet the development needs of West Lancashire. As such, it is likely that some land will need to be released from the Green Belt for development. The Council agrees that provision of infrastructure alongside new dvelopment is important and the Local Plan seeks to address this.
26	No comment	
28	In Scenario 2 and 4 - do you mean Skelmersdale or Skelmersdale with Up Holland? - - Scenario 1 is the most appropriate option although considering the recent housing developments in UpHolland we consider minimal new development and regeneration of existing stock is the only	Noted

ID	Representor Comments	Council Response
	suitable option for Up Holland.	
30	Scenario2. I would prefer Scenario 4 but the poor state of the town centre combined with the poor image the council paints of the town in documents such as this detracts from the attractiveness of the town to would be house purchasers. The use of the golf course for landfill "improvements" gives visitors the impression that no one cares.	Noted
31	Scenario 2 or 4 - Housing development should be concentrated around Skelmersdale and Ormskirk with Employment development being concentrated in Skelmersdale and the Western Parishes. - I am strongly against option 3 as this puts an unacceptable burden on the Northern Parishes which are known to suffer from traffic gongestion and infrastructure difficulties.	Noted
32	Scenario 4 appears to be the best option, giving housing development and providing employment will help lower levels of deprivation in Skelmersdale.	Noted
35	The Council's own assessment of Scenario 1, that this does not necessarily reflect the most sustainable approach is supported. Instead, the distribution should reflect where recent development and demand for development is taking place and the locations where growth could be supported, and to what extent. - Scenario 2, which seeks to focus new development in and around the Key Service Centres of Skelmersdale, Ormskirk and Burscough is supported. This reflects the role of these settlements within the settlement hierarchy of the Borough, as shown by their identification as Key Service Centres. Furthermore, settlements such as these often have a wide range of shops and services and are well connected by a range of public transport links, meaning they are sustainable settlements, capable of accommodating increased development. - Scenario 3, to allocate more development to the rural areas is not considered appropriate. This approach would not reflect the accessibility of settlements where development is to be focused and would not utilise existing infrastructure, likely resulting in the need to provide increased infrastructure to serve new developments at an increased cost and a greater impact on the environment. - Therefore, it is considered that new development within the Borough should be focused towards areas where there is existing infrastructure to support such growth, and consideration should be given to what type of development can be accommodated within different areas. Additionally, distribution of development should be considered depending on where there is the ability to upgrade infrastructure to support such levels of development. - It is necessary to note that it may not be appropriate to specify the distribution of development at the start of the Plan period without some flexibility to ensure that development comes forward to meet the requirements of the Borough and is not unnecessarily hindered, responding to changes in circumstances and needs during the Plan period.	Noted
39	Response A – Scenario 1 - - Scenario 1 – Distributes development in accordance with current development and population patterns. -	Noted
40	We strongly support Scenario 2 which focusses development in and around the Key Service Centres of Skelmersdale, Ormskirk and Burscough. Caution, however, will need to be paid to the ultimate level of growth identified for Skelmersdale as the market may struggle to deliver very significant levels in this area. In the first instance a full understanding of site availability needs to be established to determine the exact nature of distribution.	Noted
42	It is not possible, at this scale, to assess specifically how each scenario might impact on the functionality of the district's and counties' (intentional plural) ecological network. To minimise such risks, we would expect to see strong protection provided in Development Management Policies for ecological networks, including their key components such as the whole	Noted

ID	Representor Comments	Council Response
	<p>hierarchy of designated wildlife sites, and habitats & species of principal importance. In designing development schemes, regard must be had to ensuring that the biodiversity of the development sites is protected, and wherever possible enhanced, with links and preferably enhancements to the identified surrounding ecological network. - - We would also wish to see similar protection for established green infrastructure and the enhancement of the ecosystem services that it provides.</p>	
46	<p>Definitely Scenario 4. Focus development on Skelmersdale. because the needs of Skelmersdale in terms of environmental improvements, housing stock improvements and the fact that there is hardly any provision in terms of retail and service provision relative to the size of population of the town. The close proximity of Skelmersdale to the M58 corridor ideally positions it as a springboard for improvement with existing infrastructure far better than any other part of the borough in terms of roads, drainage and mains services ready to build and extend upon. In order to attract good quality jobs and a good range of housing, capitalising on the Liverpool City Region and Greater Manchester Region means that Skelmersdale can truly lift itself into a whole different level of ambitious regeneration which will not only significantly improve the lives of the residents of Skelmersdale but will also greatly benefit the borough of West Lancs as whole. The patchy nature of potential employment opportunities throughout the borough means that we need to maximise the possibility of where we can actually genuinely attract quality employment in sufficient concentrations to bring about regeneration.</p>	
47	<p>I think the main problem with all scenarios is that the planning department is mainly allowing housing developments without sufficient amenities.</p>	<p>The Local Plan will seek to ensure sufficient amenities and services are provided to support new development, but such provision is not always in the control of the Council.</p>
48	<p>Scenario 4 as the area already has the infrastructure to hand and the availability of brownfield sites.</p>	<p>Noted</p>
54	<p>Issue 4 seeks views on the broad location of new development, of which option 2 proposes locating new development adjacent to existing settlements. The Options Paper acknowledges that this option will inevitably involve the loss of Green Belt due to the current tight boundaries drawn around existing settlements. Whilst this is the case, locating new development directly adjacent to existing services and employment will reduce the need to travel and emissions thereto, which is considered to be the optimum sustainable growth strategy. - We strongly support option 2 and consider that our client's property and adjacent land at Derby House, Wrightington is a suitable allocation site for development under this option, involving the release of the property and the adjacent 6 hectares of agricultural greenfield land from the Green Belt. - Derby House is an existing successful retail and leisure destination, providing important services and employment for the locality and wider Borough. Its future sustainability and success must therefore be protected by its formal recognition and allocation within the emergin Local Plan. - Land adjacent to Derby House is a greenfield site with no significant constraints to development and sustainably located with good access to bus routes and the nearby M6. The site is available for development and thus capable of delivering new development, assisting the Council in being able to demonstrate a flexible supply of deliverable sites for new development. - Derby House and land at Derby House, Wrightington has also been submitted to the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2017 consultation to further enable its consideration through the Local Plan process.</p>	<p>Noted. Site suggestion will be considered as part of the SHELAA and Local Plan preparation.</p>
57	<p>Either Scenario 1 or 2 would promote sustainable development more effectively than 3 or 4.</p>	<p>Noted</p>
58	<p>The HBF does not have any particular preference regarding the options for</p>	<p>Noted</p>

ID	Representor Comments	Council Response
	<p>the spatial distribution of housing and employment land. It is, however, imperative that - whichever option is chosen that it is demonstrated to be deliverable and viable over the plan period. This assessment should conform to footnote 11 of the NPPF, paragraph 47.</p>	
59	<p>“• Scenario 1 seeks to spread new development around West - Lancashire according to the proportionate size of existing - settlements. As pointed out above, simply maintaining the - same proportionate distribution could mean that some - settlements have to take more development than their existing - infrastructure, services and environment can practically cope - with and / or that other settlements take less development than - they could otherwise cope with. For the higher development - requirements (e.g. Options D and E) and the longer plan period - (Option II), it is probable that just about all spare existing - infrastructure capacity would be ‘used up’ in all settlements. - However, even for the lower development requirements it is - highly likely that this scenario would require the significant - improvements to infrastructure such as waste water treatment - serving Ormskirk and Burscough that are identified in the 2012 - IDP and the highways implications for the same towns would - - • Scenario 2 seeks to focus new development in and around the - Key Service Centres of Skelmersdale, Ormskirk and Burscough. - This scenario locates more new development around the - Key Service Centres which have more key infrastructure. As - with Scenario 1, there would be a requirement for significant - improvements to waste water treatment for Ormskirk and - Burscough and careful consideration of highways impacts of new - development in Ormskirk and Burscough. - - • Scenario 3 seeks to allocate less development to the Key Service - Centres and more to the rural areas such as the Northern - Parishes, where there is currently less key infrastructure. As - such, this scenario would necessitate significant investment - in infrastructure in the rural areas. As highlighted above, this - could involve the significant expansion of a small village or even - the creation of a new settlement. As such, there will be a need - to introduce new infrastructure in locations where it does not - currently exist. In some cases, enhancing existing provision (e.g. - broadband) is easier than creating it ‘from scratch’; in other - cases (perhaps road capacity), new provision may be easier, - although there is no hard and fast rule. - - • Scenario 4 focuses development on Skelmersdale, and could - reflect a need, or policy objective to grow Skelmersdale - significantly more than the other Key Service Centres. This - may tie in with current infrastructure capacity that exists in - Skelmersdale (for example, highways capacity), and mean that - infrastructure constraints in other Key Service Centres (for - example waste water treatment capacity) are not exacerbated - to any great extent. High levels of development in Skelmersdale - could aid the business case for major infrastructure - improvements such as a rail station at Skelmersdale.” - - The problem with all scenarios 1 to 4 is that the circles on small-scale maps are misleadingly small for what is being mooted. For example, the inclusion of Bickerstaffe Ward with Skelmersdale and Upholland is not illustrated by any of the scenarios but the outer circles showing new development areas seem to cover only areas that have already been developed. We conclude that the real proposal is to extend Skelmersdale significantly in a westerly direction but avoiding Lathom, Newburgh, Parbold and Dalton Parishes. This is being obscured. Outward development inevitably entails urban sprawl and tends towards the merger of towns. At present the distance separating the towns of Ormskirk and Skelmersdale is about the minimum to retain real separation and the Green Belt in between the towns should be guarded resolutely. - - The dangers presented by Green Belt release apply to most of the Borough but the area to the west of Ormskirk (up to the Scarisbrick boundary) seems to carry the least risk of merging towns; development there would at least be in an area of greatest daily commuting (Ormskirk to Southport and Southport to Ormskirk) which is still within relatively easy reach of Ormskirk railway station, served by a circular bus route and the Southport to Wigan services. One caveat is that we do not favour basing development plans on</p>	Comments Noted

ID	Representor Comments	Council Response
	<p>huge estates, which are difficult to absorb into local communities. Instead, much development could be absorbed in small extensions to the many villages and benefit those communities by supporting schools, pubs and play/sports facilities and small village halls, by virtue of an influx of younger families. - - The addition of Bickerstaffe Ward to Skelmersdale and Upholland is not logical in terms of the expansion of Skelmersdale, which, in any case, is not justified in advance of much-needed improvements to parts of the existing built up areas. It is logical only in the context of proximity to the M58 and then only to the areas which are immediately adjacent to the motorway. Very limited and controlled development of small centres would be possible without destroying the essential rural nature of the area. - - The review of Lancashire County Council Divisions indicates areas of common interest in the Borough, as well as balancing populations, and we can see no better way of dividing the borough than following that. The Spatial Portrait recognises that there is nothing of note to justify combining Bickerstaffe Ward with the “Regional Town” of Skelmersdale with Upholland, recognising that the Simonswood industrial area stands alone. - - Within the limited time available we have been unable to study and digest the whole suite of documents and supporting information which underpins this set of proposals. Unfortunately, volunteers do not have the resources to devote to this task, bearing in mind that full time employees of the Council and consultants have spent many months assembling them. - - Please note also: - - 1. We query the annual average migration numbers shown in table 9 of the HEDNA, in which the numbers appear to have been reversed between ‘internal’ and ‘international’ columns in the 2008 to 2015 period. - 2. We have been unable to locate the SHELMA on the Council’s website, contrary to the statement in para 3.2.2. -</p>	
60	<p>4.1 Our scenarios for the distribution of development are set out in paragraph 3.4.3. They are: - • Scenario 1: the existing pattern of household and employment land distribution; - • Scenario 2: a focus on the key service centres; - • Scenario 3: a focus on rural communities; and, - • Scenario 4: a focus on growing Skelmersdale in particular. - 4.2 Our overarching view is that one of the above specific scenarios should not be chosen and the distribution of development should be based according a settlement hierarchy and the needs of each settlement. This would be more broadly in accordance with a mix of Scenarios 1 and 2 as a settlement hierarchy would be based on the existing pattern of housing and employment land distribution and the majority of newly arising need would be best placed at the Key Service Centres as that is where they would be best served. This should not be at the expense of rural settlements which the Framework is clear that development should enhance or maintain the vitality of rural communities. - 4.3 Therefore the settlement hierarchy as set out in Policy SP1 of the adopted local plan is supported. A concern we had at the Local Plan Examination was how development was distributed in Policy SP1 where Burscough was given 850 dwellings whereas the significantly larger and more accessible Ormskirk with Aughton was given 750 dwellings. Going forward it should be recognised that the existing Local Plan has provided Burscough with sufficient land to meet its needs going forward in the LPS through the allocation and safeguarded land at Yew Tree Farm for 1,000 dwellings and 60 at Red Cat Lane (Plan B). The clear and compelling needs for Ormskirk with Aughton must be addressed and its role in West Lancashire and the wider region recognised which reflects its services, facilities and rail links and the growing status of Edge Hill University. - 4.4 It is therefore apparent that with Burscough being able to deliver that level of development provided all sites come forward, then Ormskirk with Aughton and Skelmersdale are the two most sustainable locations to meet need. - 4.5 Therefore we can conclude that future development should be based on the settlement hierarchy set out in Policy SP1 and that each settlement should be allocated the requisite share of the overall housing requirement to reflect their role and status.</p>	Noted

ID	Representor Comments	Council Response
61	<p>I think scenario 4 is the most appropriate. This is because Skelmersdale has good road infrastructure with easy access to major motorways. It is ideally placed to take advantage of the opportunities that will be presented by Liverpool 2. Developing Skelmersdale will help to narrow the disparity in deprivation between Skelmersdale & the Northern parishes. I think Burscough centre has been greatly improved over recent times, but the other key service centre of Ormskirk has not.</p>	Noted
62	<p>The Options Paper sets out four potential scenarios in respect of distribution: - · Scenario 1: the existing pattern of household and employment land distribution; - · Scenario 2: a focus on the key service centres; - · Scenario 3: a focus on rural communities; and, - · Scenario 4: a focus on growing Skelmersdale in particular. - - It is considered that distribution should be a hybrid of Scenarios 1 and 2. Development should be distributed around West Lancashire and whilst providing development in the current distribution format is supported in principle (development proportionate to the size of the settlements) it is important for employment to be better distributed. It is considered that Ormskirk and nearby areas, such as Bickerstaffe could accommodate a greater employment provision going forward (as suggested in Scenario 2). Scenario 1 is therefore considered - a sound basis for assessing the future distribution of development but is not the most appropriate approach on its own. - Scenario 2 supports greater development in the Key Services – particularly Ormskirk with Aughton. This is considered a more sustainable Scenario (particularly when considering existing services and infrastructure etc.) than Scenario 1. Notwithstanding this, whilst it is important for the Key Service Centres to support a large percentage of development, some smaller scale development should still go to the smaller settlements to ensure that these villages remain proportionally vibrant (but not to the extent suggested by Scenario 3). - We therefore support Scenario 2 and consider it to be the most appropriate option, particular emphasis should be given to development around Ormskirk (with Aughton) and to those locations which could accommodate large scale logistics sites.</p>	Noted
64	<p>In terms of the proposed distribution, it is noted that there are difficulties associated with each approach in terms of housing and employment land requirement distribution. It is our Clients' view that a hybrid approach should be adopted which focuses on the growth of Skelmersdale as a Regional Town, alongside the growth of Key Service Centres and rural communities. Whilst our Clients have land interests specifically to the west of Skelmersdale, it is recognised that there is a need for more housing and employment land throughout the Borough. The current approach of development within the existing pattern of household and employment land distribution has not worked effectively. - - It is our Clients' position that without the release of Green Belt land, none of these options are deliverable. The NPPF confirms in Paragraph 83 of the NPPF that the Green Belt should only be altered in exceptional circumstances, through the preparation or review of the Local Plan given the Green Belt constraints which exist throughout the Borough. It is therefore appropriate to undertake a Green Belt review at this time, particularly given the aspirations of the Council to extend the Plan period to 2050. If this is the case, it is pertinent that the Green Belt is reviewed, and Green Belt land is released to meet the needs of the Borough in full within the Plan period and beyond.</p>	Noted
66	<p>In the first instance the Council should identify what the OAN for the borough is before any decision is made on the spatial approach. - - In terms of the proposed spatial distribution, the current options being considered explore a series of options which consider the various potential strategies. Gladman would be supportive of delivering growth towards principle settlements within the borough, especially those considered to be sustainable with access to a variety of services and facilities. This should however not be at the expense of allowing proportionate growth</p>	Noted

ID	Representor Comments	Council Response
	opportunities from coming forward in sustainable lower order settlements. - - Paragraph 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and vitality. It is essential, therefore, that the needs of sustainable rural settlements across the borough are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability.	
67	see attached submissions	Noted
69	Scenario 4 is the most sustainable, given the existence of greater brownfield space, actual and potential infrastructure. - - The principle for any significant development should be that it takes place primarily within existing brownfield sites, and only where the resources - transport infrastructure, public transport/health/social/educational services and facilities, utility supplies and infrastructure,commercial facilities to meet daily needs - exist.	Noted, see comments on brownfield land above.
70	The distribution of development for the Borough needs to ensure opportunities for growth are - provided for both larger and smaller settlements. This ensures that whilst there is growth in - the main towns within the Borough, it also allows for sustainable growth in rural areas. We - believe this is important in order to ensure the future vibrancy and viability of smaller - settlements in West Lancashire. - - Whilst this would reflect Scenario 3 to a certain degree, we have strong concerns that all the - scenarios considered do not identify or make an allowance for spatially accommodating needs - from other authorities within the Borough. For instance, there is a clear opportunity to - accommodate additional growth as sustainable extensions to existing coastal settlements - within Sefton (such as Ainsdale) in line with the longer plan period suggested through this - consultation document (which goes beyond the current plan period of the adopted Sefton Local - Plan) or to accommodate any further uplift in housing needed in the area as a result of further - growth opportunities. This needs to be included within the strategy for distribution. The - development of land on the edge of Sefton (and Ainsdale in particular) would be appropriate - given the town's significant population and its ability to offer employment opportunities and - services for West Lancashire. - - We would therefore advocate a new scenario based on these above comments. - - Given the amount of development we believe is needed for West Lancashire over the plan - period, releasing land from the Green Belt will need to be considered. Whilst we note that the - Council undertook a Green Belt Study in 2011, this needs to be re-examined and revised; especially as the assessment does not appear comprehensive in nature and we believe does - not assess the Commissioners' land correctly.	Noted
72	Scenario 3 is the only scenario that will work economically and produce growth. It sits naturally within a plan to grow the agricultural economy in its broadest sense. Options 1,3 and 4 will fail.	Noted
73	WLBC has presented four potential scenarios for distributing economic and housing - growth across the Borough, which can be summarised as follows: - 1) Replicating the existing pattern of household and employment land distribution - 2) A focus in and around the Key Service Centres of Skelmersdale, Ormskirk and - Burscough - 3) A focus on rural communities - 4) A focus on growing Skelmersdale, in particular - These scenarios are considered in turn below. - • Scenario 1: The University is concerned that Scenario 1 could continue the - existing pattern of employment development, which is heavily 'skewed' towards - Skelmersdale. Continuing to replicate this pattern could compromise the ability of - Ormskirk with Aughton to contribute to economic growth and meet development - needs in the future. - • Scenario 2: Focusing the majority of new development within those parts of the - Borough that are identified as being the most sustainable in terms of connectivity - and the number of services and facilities is a sound planning principle. As - indicated above, the University considers that Ormskirk with Aughton should - receive more development	Noted

ID	Representor Comments	Council Response
	<p>than currently envisaged in the adopted Local Plan - owing to its sustainability, scale and function. - Scenario 3: Focusing new development on rural communities would be likely to - lead to unsustainable patterns of development and increased reliance on travel by - private car. Such an approach is also likely to require significant investment in - supporting infrastructure and services. This option should be discounted. - • Scenario 4: A specific focus on Skelmersdale has the potential to result in - housing and employment needs in other settlements failing to be met. Such an - approach would also fail to reflect the significance of Edge Hill University – which - is located in Ormskirk – to the economic growth of the Borough. - In light of the above, Edge Hill University considers that Scenario 2 is the most - appropriate starting point to adopt in the distribution of housing and employment land - across the Borough but would advocate that Ormskirk with Aughton should receive - more development than currently envisaged in the adopted Local Plan owing to its - sustainability, scale and function.</p>	
74	<p>The white paper on housing provides a clear direction of travel to providing more houses more quickly across the Borough. A particular focus of this is providing smaller development sites for small and medium housebuilders as a way of ensuring that delays in delivery can be addressed, not relying solely on a few large sites for a few major housebuilders. In order to attract such development, a focus should be given to providing smaller sites in more locations across the Borough. A variation of Scenario 1 would be appropriate, spreading development to more settlements. - Potential sites adjacent to existing settlements, in locations with good accessibility or services should be promoted as much as possible.</p>	Noted
77	Keep smaller developments in villages and allow locals to buy/rent.	Noted
78	Where there is good access and suitable roads.	Noted
79	<p>The Strategic Development Options Paper sets out the following four scenarios with regards to - the spatial distribution of development: - ☐ Scenario 1: The existing pattern of household and employment land development. - ☐ Scenario 2: A focus on the Key Service Centres - ☐ Scenario 3: A focus of rural communities - ☐ Scenario 4: A focus of growing Skelmersdale in particular - The four Scenarios are discussed in further detail below. - - Scenario 1 seeks to spread new development across West Lancashire according to the current - distribution of existing households and employment land. The Council advises that this option - effectively continues the current situation in terms of the proportionate size of settlements in - West Lancashire. - Story Homes do not consider that Scenario 1 should be the basis of the spatial distribution of - development in the Local Plan Review. The Spatial Portrait Paper (February 2017) identifies the - following key issues for Skelmersdale with Up Holland: - Skelmersdale 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. - ☐ Skelmersdale town centre would benefit from enhancement of its retail, leisure and - evening economy offer to cement its role as the highest level centre in the Borough. - ☐ Whilst Skelmersdale with Up Holland has reasonable bus services to nearby towns, - Skelmersdale at present lacks a rail station. Whilst it is understood plans are being - considered for a new garden village which would include a new train station, it is - considered that it will take a considerable length of time for the housing market to - improve in Skelmersdale, even with a new station. Furthermore there cannot be absolute - certainty at this stage if and when the new station would be delivered. - The above factors make Skelmersdale a very unattractive location for the housing market. The - adopted Local Plan’s dependence on Skelmersdale has already appeared to be impacting - housing delivery in West Lancashire (as set out at paragraph 2.6) and the promotion of a -</p>	Noted

ID	Representor Comments	Council Response
	<p>strategy within the Local Plan Review which seeks to continue this approach will make - achieving increased levels of housing delivery extremely difficult. Continuing this approach will - further stifle development within West Lancashire. The Local Plan Review should look to deliver - housing in areas which will enable a range and choice of dwellings to be built to meet market - and affordable needs. Scenario 1 is not justified as it is not the most appropriate strategy, when - considered against the reasonable alternatives, based on proportionate evidence. - Scenario 2 seeks to focus new development in and around the Key Service Centres of - Skelmersdale, Ormskirk and Burscough so, for housing, the areas encompassing these towns - will take a larger proportion of new housing development under Scenario 2. The Strategic - Development Options Paper considers that Scenario 2 “essentially adjusts the historic pattern of - development in Scenario 1 to make it more sustainable by locating more new development - around the Key Service Centres (which have more key infrastructure) in a broadly proportionate - way, though not entirely removing the historic patterns.” - Story Homes consider that a spatial distribution scenario which focuses growth on Key Service - Centres provides the basis of a reasonable approach, subject to the quantum of development - allocated to each settlement and their surrounding areas. The Local Plan Review needs to - promote an approach that will meet housing market requirements for choice and competition, - therefore promoting an approach which would, at the appropriate time in the Plan’s production, - allocate a range of sites across the Key Service Centres. The adopted Local Plan’s approach of - concentrating development in Skelmersdale and on a large site in single ownership does not - present the required flexibility to enable choice and competition. - The Key Service Centres, and their supporting towns, benefit from existing infrastructure which - would be able to support development within these locations. As such, Scenario 2 presents a - sustainable approach to development - An approach, such as Scenario 2, would assist in ensuring that development potential meets - housing requirements by delivering a diverse supply of sites. Story Homes therefore consider - that Scenario 2 would be a good starting point in determining the spatial distribution of - development for the Local Plan Review. Is imperative, however, that development allocations - are not skewed heavily towards Skelmersdale, for the reasons set out in the response to - Scenario 1. - Scenario 3 is presented as “the opposite of Scenario 2”, seeking to allocate more new - development to the rural areas, and so less to the Key Service Centres. The Strategic - Development Options Paper advises that the Northern Parishes in particular would therefore - see a greater level of development under this Scenario, as would the Eastern and Western - Parishes. - Story Homes do not support Scenario 3, however do recognise that a number of the rural - communities, specifically the large and medium-sized villages, play an important supporting role - to the Key Service Centres and therefore, where infrastructure is able to support development, - the Local Plan should consider how villages (such as Rufford) could be considered as part of a - Scenario 2 spatial distribution of development. - For the reasons set out in response to Scenario 1, Story Homes do not consider that Scenario 4 - should be pursued by the Council. This will not provide the foundations for an effective plan. - In summary, Story Homes consider that Scenario 2, which proposes to focus development - within Key Service Centres, would provide a reasonable starting point to determine the spatial - distribution of development within the Local Plan Review. Story Homes, however, consider that - an updated SHELMA would need to influence the proposed distribution of the OAN to each Key - Service Centre to ensure that the development allocations will be deliverable and developable.</p>	
81	<p>We consider the four options presented to be unbalanced and is not a sustainable approach for the Borough, if it is to achieve its Draft vision and objectives, as proposed or as we submit above. - - Importantly, development in terms of spatial distribution should be proportional, but it must meet the needs of the Borough as a whole. - - It cannot, as these 4</p>	Noted

ID	Representor Comments	Council Response
	<p>options suggest advocate a one or the other approach, whereby either one part of the Borough seeks the benefits and the other loses out. This is not good planning, nor is it sustainable and does not meet the requirements of the NPPF. - - In our view, a more balanced approach should be taken, where development should be directed based on the needs of those areas; for example, Scenario 2, proposes a 90/10 split for housing towards the key services centre (90%) and 10% for everywhere else - On what basis has this calculation been assessed? - - The Northern Parishes, which contains the majority of the Agriculture and food production industry are particularly important to the West Lancashire economy. According to agricultural census data, there are 400 agricultural holdings in West Lancashire employing 2,300 people. The annual BRES data collected by ONS reports and additional 200 employees are employed in agriculture in 2015, in addition to those employed on farms. - - In terms of food processing, BRES data indicates that there are 2,250 jobs in food production in West Lancashire representing a third (32%) of the manufacturing jobs in the district and 4.7% of total jobs. - - Food production has been the source of much of the growth in manufacturing employment both in West Lancashire and also across GB. However West Lancashire has been much stronger growth accounting for 17.1% of manufacturing jobs since 2009, This has helped support overall growth of manufacturing employment in the borough, whereas GB has seen a fall in total manufacturing employment. - - Together, agriculture and food production account for 10% of jobs in West Lancashire compared to fewer than 3% nationally. - - None of the Options, as proposed takes into consideration the importance of providing housing for this key sector within the West Lancashire economy. - - In conclusion we strongly disagree with Options, 1, 3 and 4, and consider that further work should be undertaken on Option 2, to assess a more accurate distribution between the key service centre and key sustainable villages (i.e, Tarleton), in terms of housing and employment.</p>	
82	<p>Scenario 4 is the most sustainable option, Skelmersdale was initially planned for a much larger population and already has the infrastructure and services - although these will need to be invested in and improved.</p>	Noted
84	<p>Scenario 1: the existing pattern of household and employment land distribution - On the surface this appears to be a logical and sustainable approach to the locational strategy. - The main reservation with this option is the overreliance on Skelmersdale and under reliance on - other sustainable local centres. - - Scenario 2: a focus on the key service centres - This is Persimmons Homes preferred option as it would represent the most sustainable approach - to future development. However, it is not considered positive planning to move all rural areas to - completely zero contributions and consideration should be made to support and even strengthen - their role without detriment to the growth the key service centres. - - Scenario 3: a focus on rural communities - Persimmon does not support a focus on rural communities to the detriment of the sustainable - growth of existing service settlements. This would likely present the greatest impact on - infrastructure resulting in the greatest requirement for development led infrastructure (both - physical and social). This will have a significant impact on the viability of development, and will - therefore impact on delivery and present unnecessary unknowns when considering the supply of - development land. - - Scenario 4: a focus on growing Skelmersdale in particular - Persimmon Homes would not support an over focus on growth within Skelmersdale. It is - appreciated that Skelmersdale presents the most challenging housing market in West Lancashire - and it is not considered that concentration of all development in this location is the most effective - option for delivery of new homes. In the Council's last Annual Monitoring review it was identified that only one of the 10 sites over 8units delivering units in 2015/16 was in Skelmersdale. This site - presented approximately 15% of the overall total annual unit completions. This was an affordable - led scheme for new Council Housing. No market</p>	Noted

ID	Representor Comments	Council Response
	<p>units (on sites above 8 units) were delivered in - Skelmersdale in the last monitoring period. It would therefore be naive to consider that a reliance - on Skelmersdale for the majority of housing development represented a sustainable approach to - delivery. - - Overall it is considered that a balanced approach of a couple of the options is taken.</p>	
89	<p>Scenario 1 seeks to spread new development around West Lancashire in accordance with the current distribution of existing households and employment land. This option effectively continues the current situation in terms of the proportionate size of settlements in West Lancashire and the availability of local employment opportunities. - Our Client does not support this spatial distribution option as it is deemed to be unsustainable. Paragraphs 3.4.5 and 3.4.6 of the Strategic Options Paper identifies some of the concerns associated with this option by stating: - “However, when the distribution of employment land, in particular, is considered, the current spread of employment opportunities from offices, industrial units and warehousing is extremely skewed towards Skelmersdale and the South-Eastern Parishes, with the Borough’s second largest settlement (Ormskirk with Aughton) making a negligible contribution (although there are of course many other types of employment opportunity in Ormskirk). - Likewise, in relation to housing distribution, simply maintaining the same proportionate distribution going forward does not necessarily reflect the most sustainable approach as it could mean that some settlements have to take more development than their existing infrastructure, services and environment can practically cope with and/or that other settlements take less development than they could otherwise cope with.” - We agree with the concerns outlined by West Lancashire, it is vital that future housing and employment development is in locations which are sustainable. The distribution of too much housing and employment land to Skelmersdale and the south-eastern parishes may not be viable and may result in serious under-delivery across the plan period. - Scenario 2 seeks to focus new development in and around the Key Service Centres of Skelmersdale, Ormskirk with Aughton and Burscough. Paragraph 3.4.7 indicates this could be as much as 90% of the overall housing distribution to be located within these settlements.. - This Scenario is supported by our clients, as locating employment land within existing key service centres is the most sustainable option. The sustainability credentials of this proposed Scenario are recognised within paragraph 3.2.8 of the Strategic Options Paper which states: - “This scenario essentially adjusts the historic pattern of development in Scenario 1 to make it more sustainable by locating more new development around the Key Service Centres (which have more key infrastructure) in a broadly proportionate way, though not entirely removing the historic patterns. This is especially the case for employment land where Skelmersdale and - Burscough still have a larger share than their populations might ordinarily justify.” - Our Client supports the delivery of development within accessible locations as this will significantly improve the sustainability of proposed developments, increase the viability of existing services and seek to provide improvements in locations where the benefit will be experienced by the most people. - Scenario 3 is the opposite to scenario 2 and seeks to allocate more land within the rural areas. It is identified within paragraph 3.4.10 that this scenario could be partially met by creating a new village, whilst the focus would generally be on the rural areas in the Northern Parishes. - Over-provision of employment land within the Northern Parishes would require vast infrastructure improvements which could render development unviable. Towns such as Skelmersdale, Ormskirk with Aughton and Burscough are all well connected by both road and rail to the wider region which is why existing businesses have located here. Locating significant amount of housing development in locations away from these centres without significant transport improvements would result in the perpetuation of unsustainable transportation methods. - If infrastructure improvements are required these should also be located where the most benefit can be realised. - Our Client does not support this option; this would not meet the immediate needs of the Borough as</p>	Noted

ID	Representor Comments	Council Response
	<p>delivery of a Strategic Village would require significant levels of new development which takes time. Hourigan Connolly Completed a Study in Respect of the Delivery of Urban Extensions for Gladman Development Limited. This study compared Sustainable Urban Extensions of sites of 500 dwellings upwards from all over the country. This information clearly indicates that from the point of achieving an allocation it is reasonable to assume it would take a developer approximately 5.5years to achieve a start on site. In addition to the lack of immediate delivery, there would be a significant amount of additional costs associated with development where there is a lack of existing key infrastructure. This could render development in the rural areas unviable. - Scenario 4 is a variation of scenario 2 with the exception that more development is required from Skelmersdale than the other Key Service centres. - This is not supported by our Client, as skewing development towards Skelmersdale is not viable. The Community Infrastructure Levy (CIL) charging schedule which has been adopted allocated a zero rate to Skelmersdale to render development in this location deliverable. Delivering a greater amount of development in Skelmersdale will not provide the infrastructure the Borough needs for growth.</p>	
95	<p>Context - 3.32 WLBC's updated evidence base4 confirms that: - "One of the key aims of the Local Plan is to create sustainable communities and promote sustainable development. Housing, employment opportunities and services should be located close together to reduce the need for travel, particularly by private motor vehicle. Development should generally be directed toward those settlements that have a good range of services and employment opportunities" - 3.33 In reflecting its evidence base, as set out in section 2, the Options Paper proposes 4 scenarios for the future spatial distribution of development around the borough, including: - • A distribution of development according to the proportionate size of existing settlements (1); - • A focusing of development in and around the Key Services Centres of Skelmersdale, Ormskirk and Burscough (2); - • A greater share of development outside of the Key Service Centres with higher levels of provision in the more rural parts of the borough. This could involve the creation of a new settlement (3); and - • A focusing of development on Skelmersdale (4). - 3.34 There is a longstanding and growing undersupply of new homes in West Lancashire. In the first four years of the current Local Plan from 2012 to 2016 just 1,016 dwellings (net) were delivered against a requirement for at least 1,208 dwellings (net). This means that there is already an undersupply of 192 new homes, despite the relatively recent adoption of the Local Plan and the lower housing target set in the early years of the plan period. This exacerbates an existing shortfall of a further 679 dwellings which built up prior to the adoption of the current Local Plan, when housing delivery was guided by the North West Regional Strategy. This is illustrated in Figure 3.1 below. - 3.35 This shortfall is likely to exacerbate in the coming years. WLBC's own data forecasts that just 1,209 new dwellings (net) will be delivered over the next five years, against a baseline requirement for at least 1,642 dwellings (net). This means that: - • A shortfall of 625 new homes will have built-up in the first nine years of the Local Plan, equivalent to almost a fifth of the minimum number of homes required; and - • WLBC has a land supply equivalent to just 2.75-years – far less than the 5-years required by the NPPF. - - [see document for chart] - - 3.36 The land supply provided by the current Local Plan is clearly not delivering enough new homes. This is due, at least in part, because it is located principally in areas of low market demand. In particular, the spatial focus of current Local Plan is to secure the regeneration of Skelmersdale, with 2,100 dwellings to be delivered in the town, supported by a reduced amount of development in the two Key Service Centres of Ormskirk with Aughton and Burscough (750 dwellings and 850 dwellings respectively). However, the amount of development delivered to date in both Skelmersdale and Burscough is significantly below that required, as shown in Table 3.3. - - [see document for table 3.3] - - 3.37 Moreover, despite the availability of development land in Skelmersdale and Burscough, there is a</p>	Noted

significant shortage of sites with planning permission to deliver the new homes urgently required. There is a total land supply in Skelmersdale of 2,649 dwellings, but only 270 dwellings (10.19%) have planning permission. This equates to a land supply of - 14 - just 1.93-years against the need for an average of 140 dwellings pa in the town, or just 1.62-years when the requirement is adjusted for under-delivery to date. Similarly, in Burscough just 145 dwellings have planning permission, equating to a supply of just 2.54-years against the average annual need for 57 dwellings, or just 2.28-years when adjusted for under-delivery to date. - - [see document for figure 3.2] - - 3.38 It is clear that the land supply in Skelmersdale and Burscough is not delivering the new homes required and this failure is exacerbating the longstanding housing shortfall in the Borough. The low rates of delivery reflect the relatively weak demand in those settlements. For example, compared to the Borough average of £206,636, house prices in Skelmersdale and Burscough (£139,239 and £188,957 respectively) are below average⁵. This is particularly the case in Skelmersdale, where house prices are just 67.38% of the average across West Lancashire. The scale of prices in Skelmersdale mean that it there are significant market difficulties in delivering a sizeable number of new homes in the town – they simply do not deliver the commercial returns required to ensure that new development is viable. Large-scale development in the town is therefore very challenging. - 3.39 Skelmersdale and Burscough between them have 63.08% of the Borough’s available land supply, despite having just 48.72% of the population and the weak demand and market challenges. Conversely, Ormskirk with Aughton – an area of comparatively higher demand (see below) – has just 13.42% of the land supply but almost a quarter (24.53%) of the population. In effect, the Local Plan provided both Skelmersdale and Burscough with a share of the land supply which is disproportionate to their size and role within the settlement hierarchy, with Burscough placed on an equal – or indeed higher – footing to Ormskirk with Aughton, despite its reduced size, sustainability and market demand. By comparison, it is clear from Figure XX below that Ormskirk with Aughton has been poorly provided for in terms of new housing supply. - - [see document for figure 3.3] - - 3.40 DWH welcomes the ongoing regeneration of Skelmersdale. However, it is likely to take many years to overcome the market difficulties which are being present in the town. As such, whilst DWH anticipates that Skelmersdale will remain a focus for development in the emerging Local Plan Review – and indeed supports such an approach given the status of the town in the settlement hierarchy – the town already has a substantial supply of available development land which is not presently being delivered. It would be unsustainable to plan for significant land releases in the area. It is clear that the spatial distribution established in the current Local Plan – which focusses to a significant and disproportionate extent on delivery in Skelmersdale, and to a lesser extent in Burscough – cannot be continued if the housing needs of the Borough are to be met, as required by national planning policy. - 3.41 A subtle change of development strategy is required. The housing needs of the Borough will only be met if significant land is made available in areas where there is market demand and where new development is viable. Such an approach will complement and could help to facilitate the regeneration effort in other locations. In this context, DWH’s strong view is that the Ormskirk with Aughton must receive a much greater share of development in the Local Plan Review. - The need in Ormskirk with Aughton - 3.42 The current Local Plan identifies that Ormskirk with Aughton is a Key Service Centre. It is the second largest settlement in the Borough after Skelmersdale. In terms of population it is well over twice the size of Burscough. Despite this, it has been critically under-provided for in terms of new housing supply. - 3.43 WLBC’s own evidence clearly points towards the opportunity for and demand for new homes in Ormskirk with Aughton. If an appropriate scale of development is not delivered to meet a number of issues and drivers, it is likely to have severe consequences for the future sustainability of the settlement. In particular: - (a) Ormskirk is the second largest settlement in West Lancashire with a population of 18,000 people.

Together with Aughton, the total population of the settlement increases to some 27,000 people (representing 24.53% of the overall population of the borough). By comparison, Skelmersdale has a population of 35,000 (38%) while Burscough has a population of 9,500. A similar picture is presented when one looks at households. WLBC's own evidence confirms that while Skelmersdale contains the largest proportion of households (38.8%) it confirms that Ormskirk with Aughton contains the second highest proportion (23.8%). Burscough, in contrast, contains just 10% of the Borough's households – less than half that in Ormskirk with Aughton. - (b) Ormskirk with Aughton represents the administrative hub of the Borough, with a large student population – associated with Edge Hill University – and several major employers including the University, Ormskirk Hospital and WLBC. The location of these employers alongside its infrastructure connections is reflective of its position as a market town and large Key Service Centre. - (c) Ormskirk with Aughton is highly sustainable. It is well served by rail with railway stations in Ormskirk, Aughton Park and Town Green and excellent access onto the main strategic highway network (A59, A570, M58). The proximity of the M58 to Ormskirk in particular is referenced in the various parts of WLBC's evidence base with the expectation that this provides the potential to support future economic growth in key sectors such as logistics⁶. The area is also well-served by regular bus services, which provide links to destinations throughout Merseyside and beyond. - (d) Ormskirk with Aughton remains a desirable place to live and is a strong market area. Owing to its strong transport connections, compared to other parts of the borough, Ormskirk with Aughton has stronger travel to work connections with other large employment centres across the City Region. The forecast higher growth across the City Region is therefore likely to have a significant impact on increasing the need/demand for further housing in Ormskirk with Aughton than other parts of the borough. - (e) Edge Hill University is a significant asset to the Borough. It makes a significant contribution to the local economy, estimate in 2011, to be in the region of \$75 million Gross Added Value (GVA). It is also one of the most significant employers in West Lancashire, employing over 1,500 members of staff in 2015/16; the vast majority being full time. It also provides a wide range of high class facilities which are well used by the community. - It is understood that the University has ambitions to further grow and expand from its previously established 'vocational-led' learning approach towards to a more 'mainstream' research-led university and its current faculties are investigating ways to further diversify their programme offer (to include postgraduate and masters programmes) as well as notable growth in research. Indeed the expansion of new areas of teaching and learning are already emerging through the opening of the Creative Edge and there recent completion of a new Technological Hub which is anchored by the Technology and Computer Sciences and supports the University's expansion in Digital Creative and Food Sciences (Biotechnology) disciplines. The hub also includes a 'enterprise hatchery' for fledging businesses and SME's (as well as the local community) and will result in the emergence of a comprehensive corridor of a science and technology quarter at the campus. - It is anticipated that this evaluation of the University will require further growth and expansion of its Ormskirk campus and generate further benefits for the borough and sub-region in terms of employment (direct and in-direct), highly skilled graduates and spin-off employment opportunities through entrepreneurship and SME activity. This continued economic growth of the University will need to be supported by providing homes commensurate to this growth. - (f) Our analysis of local market signals in the accompanying submission 'Housing Need – Evidence Based Critique' identifies that the settlement currently demonstrates symptoms of relatively significant imbalance between the supply and demand for housing compared to other parts of the borough. This is driven by strong demand for housing illustrated through higher average house prices which has in turn implications for affordability. In particular, the average house price in Ormskirk with Aughton is c.£240,000, which is well above the

ID	Representor Comments	Council Response
	<p>Borough average of c.£207,000. WLBC's own evidence⁷, which states that "...much housing is unaffordable, making home ownership, including for first time buyers, increasingly difficult...". If this is not addressed, this will present challenges for working age households and those looking to enter the housing market for the first time in remaining in the area and risk in delivering an unsustainable and unbalanced community in the settlement. It will also potentially threaten delivering upon WLBC's economic ambition and economic growth. - (g) Our analysis confirms that the population in Ormskirk and Aughton is ageing, with WLBC's evidence identifying that the area has "...one of the highest proportions of people over 65..."⁷ in the Borough. Without suitable new housing stock to retain and attract young families, the average age of the population will continue to rise and the proportion of younger and working age households will decline further. This will have adverse impacts on the local economy, the vitality of local shops and facilities, and increase the burden on health-related services. - 3.44 It is clear from the above that there is a significant and growing need for an increase in the number of new homes which are being delivered in Ormskirk with Aughton. The settlement is under-provided for in the current Local Plan, with the amount of development proposed falling far short of the role of the area in the settlement hierarchy. This must be rectified by the Local Plan Review. - 3.45 DWH considers that the amount of residential development provided for in Ormskirk with Aughton must be commensurate with its size and profile in the Borough. It should, as a minimum, accommodate at least 25% of the development requirement established in the Local Plan Review; this share of growth would be equivalent to the size of the settlement and its population. An uplift to this proportion should also be applied, mindful of the market signals which clearly highlight the strength of demand and, by implication, the scale of the need in the settlement.</p>	
96	<p>It is noteworthy that whilst the Spatial Portrait refers substantively to the identified Spatial Areas, the above - scenarios only name the key service centres. For consistency, and to promote delivery, we would suggest that - the scenarios should be amended to refer to Spatial Areas or alternatively for a further scenario which expressly - confirms that approach. - AIUH has land interests in the Up Holland area that could be suitable for housing and commercial development - subject to market conditions. This falls into the proposed Skelmersdale and Up Holland Spatial Area. - The Council is aware that market conditions for new residential development in the Skelmersdale area are - challenging. AIUH considers it appropriate that reference should be given to the wider Spatial Area to give an - opportunity for the delivery of residential development in existing stronger market areas, with the potential for - delivery in Skelmersdale should market signals improve later in the Plan period.</p>	Noted
97	<p>St Modwen clearly has land interests in the Skelmersdale area that could be suitable for housing and commercial development subject to market conditions. St Modwen considers it appropriate that residential development opportunities in Skelmersdale be supported but as part of a broader approach which also encourages development in stronger market areas. - In respect of retail and town centre uses, St Modwen reminds the Council that the Skelmersdale town centre area is substantial and provides latent physical opportunity to support further town centre uses to supplement the existing town centre offer for Skelmersdale. This includes the leisure-led scheme to extend the town centre in terms of its offer, ability to trade into the evening and to link other areas such as the College. In respect of town centre uses, we support Scenario 4.</p>	Noted
99	<p>In terms of the proposed distribution, it is noted that there are difficulties associated with each approach in terms of housing and employment land requirement distribution. It is our Clients' view that a hybrid approach should be adopted which focuses on the growth of Skelmersdale as a Regional Town, alongside the growth of Key Service Centres and rural communities. Whilst our Clients have land interests specifically to the west</p>	Noted

ID	Representor Comments	Council Response
	<p>of Skelmersdale, it is recognised that there is a need for more housing and employment land throughout the Borough. The current approach of development within the existing pattern of household and employment land distribution has not worked effectively. - - It is our Clients' position that without the release of Green Belt land, none of these options are deliverable. The NPPF confirms in Paragraph 83 of the NPPF that the Green Belt should only be altered in exceptional circumstances, through the preparation or review of the Local Plan given the Green Belt constraints which exist throughout the Borough. It is therefore appropriate to undertake a Green Belt review at this time, particularly given the aspirations of the Council to extend the Plan period to 2050. If this is the case, it is pertinent that the Green Belt is reviewed, and Green Belt land is released to meet the needs of the Borough in full within the Plan period and beyond.</p>	
108	<p>Scenario 4. - The most sustainable option is to build where the infrastructure and services are already. - Unfortunately areas of Skelmersdale are unappealing for people to live, and this is a huge job to improve/change</p>	Noted

Question 13: Where should new development be located in principle? Are there any key constraints (potentially such as flood risk) which would mean development should be severely limited in the areas affected by those constraints?

ID	Representor Comments	Council Response
1	Build higher were appropriate adopt Staffordshire councils - lead they allow local people to self build on greenbelt land - but they are only allowed to sell at 60 percent of the value - this will ensure genuine people apply 350 houses have been - built so far	The Council will explore Staffordshire Council's approach to self-build and consider if it is appropriate for West Lancashire.
2	Of course all flood risks should be assessed	Noted
9	Option 1 every time. You cant get greenbelt back once it has been destroyed.	Noted
14	concentrate in the 3 towns	Noted
18	Housing for older persons is most appropriately located on infill developed in urban areas. Accordingly we support Option 1.	Noted
20	Skelmersdale is the obvious choice for a New Garden City. It has the space,capacity and infrastructure and is well linked to the Motorway networks.	Noted
21	Rufford has frequently been flooded. The land is not suitable for building.	Noted.
23	Option 3. If new development must occur it is logical to create a well supported "New town" with appropriate infrastructure rather than straining what already exists.	Noted
24	I think we should try and conserve as much of the countryside as is humanly possible - for our future generations to enjoy. Therefore I would opt for Option 1. Option 1 I think should apply particularly to Skelmersdale. It is a very large community but they have very little in the way of facilities or transport. Option 4 seems to be common sense.	Noted
26	Option 1 will ensure that the infrastructure is already there in a lot of cases.	Noted
28	Option 1	Noted
30	These options are not mutually exclusive, Option 4 must be adopted until decisions are made to continue to operate the pumps currently under notice of closure by the Environment Agency. The impact of flooding will be felt by the economy, infrastructure and those travelling from and through West Lancashire as well as the houses at greater risk of flooding. Option 1 should include building higher. I have identified option3 as a key issue not identified by the council/author.	Noted
31	Option 3, close to Skelmersdale	Noted
32	New development should be in and around Skelmersdale there is easy motorway access. Also the potential for bringing in employment will help protect the environment be hopefully reducing the daily commute thus reducing car emissions. - Areas in flood zones should not be built on. Nor should areas with critical drainage issues	Noted
34	We support Option 4 as it follows the methodology specified within the NPPF. However if through evaluating these options for locating new development you are unable to restrict development out of flood risk areas then any site allocations within the flood risk zones will require the application of the Sequential approach and a Level 2 Strategic Flood Risk Assessment (SFRA). If Option 4 is brought forward then there will still need to be consideration of ensuring development will not increase flood risk elsewhere through effective surface water management whilst recognising	Noted

ID	Representor Comments	Council Response
	<p>current problems. - As identified by the Spatial Portrait Paper and the level 1 SFRA there are current issues of flood risk within Burscough which is within Flood Zone 1. Through assigning areas for new development consideration should also be given to opportunities for resolving current problems. - In regards to the issues at Burscough, there has been previous discussions over if this could be designated as an 'area with critical drainage problems'. Unfortunately the flooding issues do not impact a main river and the Environment Agency are therefore unable to designate it ourselves as it does not meet the criteria stipulated by the NPPF. - Despite this it is recognised that there are problems locally resulting from surface water run-off which impact local drainage systems. The new Local Plan presents an opportunity to resolve/ensure future development does not exacerbate the problem. To resolve/manage this the Local Plan and subsequent Site allocations could include policies to guide developments and help address such concerns. We would be happy to help in the creation of such policies alongside consultation with the LLFA. Consideration should also be given as to whether the use of Community Infrastructure Levy (CIL) funding could be utilised from future development to effectively manage surface water for developments within Burscough to create a joined up solution. - In terms of flood risk we recommend a catchment approach to managing flood risk and drainage. This can include using slow the flow upstream where possible and could also be done through the use of CIL funding. This may require working with neighbouring authorities. Such an approach can bring many benefits including reducing pollution and improving water quality and biodiversity. - Another item to draw your attention to are the Alt Crossens Pumping Stations. Whilst this is mentioned within the SFRA it does not feed through to the Local Plan document and could be a significant issue for West Lancashire. The Environment Agency prioritises flood risk management activity that provides the greatest protection for people and property, and to support this, it is stopping land drainage activity including the operation of pumping stations in areas where evidence shows that it does not deliver sufficient flood risk benefit to people and property. A sustainable alternative needs to be agreed to manage land drainage in Alt Crossens for the benefit of agriculture, the environment, communities and businesses to form part of the overall water level management strategy in the catchment. We note that the plan refers to the high quality agricultural land within West Lancashire and some of this is within the area that is managed through the pumping stations. A solution therefore needs to be sought for this area.</p>	
35	<p>Whilst the approach of option 1 to maximise the capacity of existing settlements through the prioritisation of infill developments is generally supported, there are a number of factors related to such development which must be carefully considered, not least that it is expected that if such sites were available for development (given their location and likely availability to infrastructure and services), in many instances it is likely that these would have already come forward for development. It is highly unlikely that there will be sufficient such sites available to meet the needs of the Borough and therefore further sites will still need to be identified. - Should the Council seek to progress this option (either as a single option or through a combined approach), it will be necessary to ensure that they do not seek to prioritise brownfield land; such an approach is not supported the National Planning Policy Framework and therefore, would prevent the Plan being found sound. - Option 3, the creation of new settlements, would have the greatest impact upon the countryside and Green Belt. Furthermore, such an approach would require the creation of considerable infrastructure to support such developments, at increased cost and timescales. - The second option is considered to be the most appropriate to effectively meet the needs of the Borough. This approach would ensure that the viability of some existing settlements is maintained and would also make use of existing infrastructure and, as discussed previously within these representations, would also provide the opportunity for these to be</p>	Noted

ID	Representor Comments	Council Response
	improved and upgraded to the benefit of the existing population, as well as future residents, workers and visitors. - As with the previous question asked however, it is necessary for the Plan to ensure an element of flexibility is applied to allow development to come forward where sites are available to meet needs.	
36	Safeguarded Land - we think it an absolute priority that land that is currently protected as 'safeguarded land' is carried forward to the next plan. This land was safeguarded for very good reasons, in the current Local Plan, therefore it is imperative that this continues, and this land is not released for development of any kind. With specific regards to Dalton, the field at the top of Beacon Lane/Higher Lane opposite St Michaels Church, is currently safeguarded. With the development that is occurring at Whalleys, this field is all that separates the rural village of Dalton, from the urban sprawl of Skelmersdale. It is vital that this field is kept as safeguarded to not only define a boundary between the two settlements, but to also maintain the rural open character of Dalton, Beacon Country Park, Ashurst Beacon & St Michaels Church.	The field referred to is not currently designated as "safeguarded land" (which is covered by policy GN2 of the adopted Local Plan, but as "protected land" under policy GN1(b) of the adopted Local Plan. Comments about the desire to continue the protection of this land noted.
39	Response A– They should be concentrated in areas suggested on the previous question but outside Flood Risk zones 2 & 3 in all cases (New Cut Lane, Moss Road etc). - -	Noted
40	In terms of Green Belt release, we generally support the release of sites that adjoin existing urban areas as these tend of have a lesser impact on the Green Belt and its associated purposes. However, as outlined elsewhere within these representations, this should not preclude the redevelopment of other suitable sites.	Noted
42	It is not possible, at this scale, to assess specifically how each scenario might impact on the functionality of the district's and counties' (intentional plural) ecological network. To minimise such risks, we would expect to see strong protection provided in Development Management Policies for ecological networks, including their key components such as the whole hierarchy of designated wildlife sites, and habitats & species of principal importance. In designing development schemes, regard must be had to ensuring that the biodiversity of the development sites is protected, and wherever possible enhanced, with links and preferably enhancements to the identified surrounding ecological network. - - We would also wish to see similar protection for established green infrastructure and the enhancement of the ecosystem services that it provides. - - That said, Option 4 would have the likely advantage of reducing the political pressure for further degradation of remaining functionality of wetland ecological networks through old-style hard engineered flood defences, with consequent impacts on biodiversity and landscape, and of improving potential availability of low-lying open land as green infrastructure for temporary and seasonal storage of flood waters ("slowing the flow"), to reduce the potential of high and/or persistent periods of rainfall flooding extant built property in the district and in other districts downstream and simultaneously improve the connectivity and functionality of the borough's wetland ecological network.	Noted
46	A blend of Options 2 & 3. Option 2. because There should be some, albeit restricted and of the right type, i.e. affordable development adjacent to existing settlements in order to address the acute shortage of truly affordable homes where there has been a predominance of 'Executive' type developments due to a market driven housing trend in recent times. - Option 3. because there needs to be a transformational approach in terms of design for the provision of settlements for the long term future. Current research into the potential for 'Garden Towns and Villages' needs to be thoroughly investigated and explored within the process of this Local Plan, so as to future proof the quality of housing and living design taking into account all the latest energy efficient and environmentally good design practises.	

ID	Representor Comments	Council Response																																																
47	I am in favour of low rise high density developments. Houses and flats and business premises up to four storeys high. No new development in areas of flood risk. Smaller gardens but larger areas for 'the commons' - wide pavements and public green areas.	Noted																																																
48	The list of options are not correct. Option 4 should be the main priority followed by Option 1. A mix of options 1 and 2 should be the next in priority status but decided on a case by case basis. Option 3 should not be included.	Noted																																																
57	No options should be ruled out. A local plan should enable sustainable development and not hinder it.	Noted																																																
60	<p>5.1 Under this section four options are set out, these being: - 1. Maximise the capacity of existing settlements; - 2. Locate new development adjacent to existing settlements to reduce the need to travel and reduce emissions; - 3. Create brand new settlements with the necessary associated infrastructure; and, - 4. Entirely restrict new development in areas at risk of flooding (i.e. in Flood Zones 2 or 3 or in a Critical Drainage Area). - 5.2 We propose that the location of development should be based on options 1 and 2. As the LPR recognises relying too much on Option 1 may result in the risk the loss of valuable urban green space or cause over-development in existing built-up areas, potentially markedly changing the character of our existing towns and villages. We agree and therefore the Strategic Housing and Employment Land Availability Assessment (SHELAA) will indicate the level of development that could be achieved. Table 1 of the Draft SHELAA concludes that there is capacity for 422 dwellings. If that figure is robust it demonstrates that Option 2 is inevitable. - 5.3 The main concern with Option 2 in the LPR documents is that this would inevitably involve the loss of Green Belt and open countryside (because the Green Belt boundary is so tight around the built-up areas of most settlements in West Lancashire). However it also recognise that this would locate new development as close to existing services and employment as possible without unduly overdeveloping the existing settlements. - 5.4 With the loss of Green Belt being inevitable under options 2, 3 and 4, to minimise Green Belt loss, then the LPR must allocate all the Plan B sites and safeguarded land in Policy GN2 of the adopted Local Plan as a priority. These sites would provide 1,540 dwellings. - 5.5 Taking account of existing commitments, the SHELAA capacity, Plan B and safeguarded land, then there will be a residual need to be met in the LPR. The current total potential supply is: -</p> <ul style="list-style-type: none"> • Completions 2012 to 2016 – 1,208 dwellings; • Commitments in 2016 AMR – 2,160 dwellings; and, - • Delivery 2021 to 2027 – 1,989 dwellings. - <p>5.6 The current housing trajectory in the 2016 AMR would expect 5,357 dwellings to be completed between 2012 and 2027. If we add in the Plan B sites (830 dwellings) that would increase to 6,187 dwellings and also adding on the safeguarded land (710 dwellings) would total 6,897 dwellings. - 5.7 The table below takes the above figures and sets out them against the 5 options in the LPR. This then calculates the residual requirement that the LPR would need to plan for assuming all the sites the above components of supply are deliverable. -</p> <table border="1" data-bbox="156 1657 986 1803"> <thead> <tr> <th>Year</th> <th>Option A</th> <th>Option B</th> <th>Option C</th> <th>Option D</th> <th>Option E</th> </tr> </thead> <tbody> <tr> <td>2012-2037</td> <td>Residual for LPR to plan for to 2037</td> <td>1,897</td> <td>7,600</td> <td>703</td> <td></td> </tr> <tr> <td>2012-2050</td> <td>Residual for LPR to plan for to 2050</td> <td>Option A</td> <td>5,000</td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td>Option B</td> <td>7,500</td> <td>03</td> <td>11,400</td> </tr> <tr> <td></td> <td></td> <td>Option C</td> <td>3,203</td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td>Option D</td> <td>10,000</td> <td>3,102</td> <td>15,200</td> </tr> <tr> <td></td> <td></td> <td>Option E</td> <td>12,500</td> <td>5,603</td> <td>19,000</td> </tr> <tr> <td></td> <td></td> <td></td> <td>3,203</td> <td></td> <td></td> </tr> </tbody> </table> <p>- 5.8 The conclusion from the above table is that under all options with one exception then even with all sites in the adopted local plan allocated, there will be a need for additional land and Green Belt release to take place under as part of the LPR. Option 2 is inevitable and the most sustainable.</p>	Year	Option A	Option B	Option C	Option D	Option E	2012-2037	Residual for LPR to plan for to 2037	1,897	7,600	703		2012-2050	Residual for LPR to plan for to 2050	Option A	5,000					Option B	7,500	03	11,400			Option C	3,203					Option D	10,000	3,102	15,200			Option E	12,500	5,603	19,000				3,203			Noted
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61	I think it would be responsible to entirely restrict new development in areas of risk of flooding for say the first 3/5 years of the plan for review to see whether this restriction has caused the settlements affected to stagnate.	Noted																																																

ID	Representor Comments	Council Response
62	<p>Following on from the distribution of development section the Options Paper sets out four Scenarios in respect of the location of new development: - 1. Maximising the capacity of existing settlements by prioritising infill developments within the built-up area or by building higher; - 2. Locating new development adjacent to existing settlements to reduce the need to travel – this option would inevitably involve the loss of Green Belt but would locate new development as close to - existing services and employment; - 3. Create brand new settlements with the necessary associated infrastructure; and, - 4. Entirely restricting new development in areas at risk of flooding (i.e. in Flood Zones 2 or 3 or in a - Critical Drainage Area). - Again it is considered that a hybrid and flexible approach should be taken in respect of the location of new development. In principle Scenario 1 is the most appropriate approach. However, it is clear that infill development within built up areas will not meet development needs. Again, it is not considered that there would be strong demand for high rise / high density developments within the borough. It follows that pursuing Scenario 2 is absolutely necessary if the borough is to deliver the right amount of development in the right locations. - In respect of Scenario 3, it is unclear as to whether there is sufficient evidence available to judge whether this is a viable option. However, our client is a major landowner in the Borough and has the potential to deliver a comprehensive scheme adjacent to key transport infrastructure. Therefore, if the Council was minded to explore opportunities for a new settlement as part of the Local Plan Review we would wish to engage further with you to explore opportunities in close proximity to the M58 and without the need to address extensive landowner assembly that is often associated with strategic sites. - - Whilst we agree with Scenario 4 in principle, it is considered that taking a blanket approach to flood risk (Zones 2&3) may rule out some parcels of land that are suitable for development, where suitable mitigation can be provided. Indeed, it is clear that a Green Belt Review is required. The Green Belt Review process, will identify those parcels of land that are severely constrained and therefore those which are considered to be unsuitable for development. Furthermore, sustainable drainage systems, such as swales can be incorporated into developments as part of public open space, potentially providing mitigation as well as nature and biodiversity benefits. - It should also be noted that our client owns a substantial amount of land adjacent to Edge Hill University. A key part of both the Councils vision and objectives is to ensure that there is sufficient student accommodation in the borough as well as being able to successfully retain graduates. It therefore follows that expansion of Edge Hill University will be necessary. Indeed we understand that the University are trying to diversify and increase their offer to attract a wider range of students. - It is understood through discussions with the Universities representatives that additional land for campus expansion is likely be required beyond 2022 to meet development needs. The University has begun to speak to adjoining landowners about potential further land acquisition to deliver an expansion of the Ormskirk campus and we consider that this expansion should form part of a wider mixed use development expansion proposal of Ormskirk.</p>	Noted
64	<p>It is our Clients' view that Green Belt release is essential to meet the future needs of the Borough both in terms of housing and employment. Without Green Belt release, none of these options are possible. - - It is our Clients' view that Option 2 is the most appropriate option, which relates to locating new development adjacent to existing settlements to reduce the need to travel and reduce emissions. Our Clients' have significant land interests for housing and employment at land to the west of Skelmersdale and it is considered that building a large urban extension to the west of Skelmersdale would be the most appropriate option. Whilst it would result in the inevitable loss of Green Belt, as alluded to previously, Green Belt release is required within West Lancashire to meet the growth aspirations over the Plan period.</p>	Noted

ID	Representor Comments	Council Response
66	<p>To meet identified housing need the Council will likely need to undertake a review of the existing Green Belt boundaries. It is essential that in conducting a Green Belt review the Council are satisfied that enough land will have been released to ensure housing needs are met both within this plan period and beyond for the next plan period to ensure that they do not have to be reviewed again in the short term. - - Indeed, the Framework is clear that 'when defining boundaries, local planning authorities should not - include land which it is unnecessary to keep permanently open.' Once established, revised Green Belt boundaries should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. - - Gladman appreciate that the release of sites from the Green Belt is a controversial issue, but this is - likely to be necessary to meet full OAN for housing and in the likely event that WLBC need to assist - neighbouring authorities in the HMA to meet unmet needs. Releasing sufficient land during this Plan - will remove the risk of further pressures in the future, will help to meet local housing needs and will - begin to tackle the significant issue of housing affordability in the borough which is placing a significant strain on the local area in terms of young people being able to afford accommodation. The Council need to be confident that the level of Green Belt release will be sufficient to meet this need and outlast the plan period as stated by the Framework guidelines.</p>	<p>The Local Plan will propose an amendment to the Green Belt boundary should land need to be released from the Green Belt to meet development needs. However, a Green Belt Review (i.e. an assessment of whether the land that is currently within the Green Belt fulfils at least one of the purposes of the Green Belt) was prepared in 2012 for the last Local Plan, and its findings still stand (that virtually all land within the West Lancashire Green Belt around existing settlements fulfills at least one purpose of the Green Belt). As such, for the Local Plan Review, should Green Belt release be necessary, determination of which sites to release for allocation will be based upon other factors, as the fact that all potential sites in the Green Belt meet a purpose of the Green Belt has been established.</p>
67	<p>Option 2 would appear to be the only logical option. - Opportunities within existing settlements are limited having been the focus for many years - the potential within settlements is finite. - - see attached submissions. - - In terms of flood risk matters and the utilisation of areas most at risk of flooding it is the case that the NPPF and PPG set out a clear sequential test to be applied in the preparation of Local Plans. The unequivocal national policy position is that development be directed away from areas most at risk of flooding (Flood Zones 2 and 3) as a preference. Therefore, sites which are largely free from flood risks constraints (i.e. sites that are wholly or predominantly in Flood Zone 1) should be considered ahead of other sites more at risk (i.e. wholly or largely in flood Zones 2 and 3. it is assumed that the emerging Local Plan will be subject to thorough and robust sequential testing.</p>	Noted
69	<p>This is not satisfactory as a list of options. "Option 4" is essential, and surely not in reality an option! - - Option 1 would in many cases be the most sustainable (resource-efficient). A mixture of Options 1 and 2, decided on a case-by-case basis, may be best. Maximising the use of existing development would be better still. Option 3 would not appear sustainable even in solely financial terms.</p>	Noted
70	<p>The options discussed within this section of the paper outline a number of options for locations - including infill, development adjacent to existing settlements and creating brand new - settlements. - - Whilst undertaking infill development can contribute towards the Council meeting its housing - target, it is considered unlikely that this alone would provide the required housing numbers - and that the Council will likely need to look at new development adjacent to existing - settlements. The Commissioners believe this is the most desirable option as it will provide the - opportunity to meet the housing requirements in the Local Plan whilst at the same time utilising - and 'plugging into' infrastructure which exists in current settlements. - - Any decisions on the location of development will need to be informed by the SHELAA in terms - of local constraints and a revised Green Belt Study.</p>	Noted
72	<p>Produce the best spaces you can where demand guarantees success by sensitively growing the existing smaller settlements into peripheral green belt with much needed residential development. This will attract inward investment and kick start growth. Build on brownfield sites within green belt irrespective of where it is located within the Borough as long as there is demand. the alternative is stagnation, decline and reduced local</p>	Noted

ID	Representor Comments	Council Response
	authority funding in West Lancashire. Make the most of the Authority's strengths rather than focus on its weaknesses.	
73	<p>Edge Hill University is keen to ensure that the new Local Plan strongly supports the - University's continued development and growth. The University is a key economic driver - for the borough, a job generator, a producer of graduates with key skills and a provider - of well used community facilities. The importance and the contribution the University can - make to the borough and its economic growth will only increase through the Local Plan - period. - The University is currently preparing an update to its Estates Strategy, which will - crystallise the University's growth ambitions and provide an updated Development - Framework demonstrating how this could be achieved. Through this process, the - University has identified development opportunities within the campus for the next 4 – 5 - years. - In the circumstances, the University is keen to ensure that a new Local Plan supports - and encourages the institution's growth aspirations to be met and further economic - value to be captured and realised in the borough. It will be important for the Plan to - provide sufficient flexibility to adapt to changing circumstances over the plan period, and - to include relevant 'triggers' for review. This will be especially relevant if WLBC opts to - prepare a plan up to 2050. - While the University is in the early stages of development planning for the longer term, it - can confirm that additional land for campus expansion is likely be required beyond 2022 - to meet development needs (as articulated above). As such the University has begun to - speak with the adjoining landowner about potential further land acquisition to deliver an - expansion of the Ormskirk campus and which is likely to form part of a wider mixed-use - expansion proposal of Ormskirk. - The University is keen to work with WLBC and other stakeholders to develop this - concept further over the coming months to inform the Local Plan process.</p>	Noted
74	Option 2 – Locating new development adjacent to existing settlements	Noted
75	<p>We agree with the Sustainability Appraisal, that Options 1 and 2 are the most sustainable. However, Option 1 should be revised to include prioritising infill development or high-rise buildings on under-utilised land. Infill development should also improve the quality of housing and urban green space that is available.</p>	Noted
76	<p>To ensure future development is sustainable by way of location, new development should be principally located within and adjacent to existing settlements. This includes settlements that do not fall within the borough of West Lancashire, as is the case with my client's Site, which effectively functions as part of Simonswood (Knowsley Council). - Previously developed sites in these locations benefit from existing utility connections and direct links to sustainable transport connections as well as being in close proximity to existing local services and facilities. This will enable future households to support existing services, as opposed to requiring the provision of new facilities etc. This approach will ensure new development, in terms of its location, is sustainable. - Discounting sites purely on high level technical constraints is not considered to be appropriate. Each site should be assessed on its merits, particularly in respect of flooding and drainage. As part of the Local Plan Review process opportunities should be made available to explore these technical issues to ascertain the source and the true element of risk as well as the potential to mitigate against it whilst also ensuring that the risk of flooding elsewhere is not increased in accordance with the NPPF.</p>	Noted
77	No in flood areas or encroaching on greenbelt.	Noted
78	Not in flood areas or near nature reserves and natural habitat - so important to many visitors or encroaching on green belt and agricultural land should grow more locally.	Noted
81	Option 2 is the most sustainable option, being new developments should	Noted

ID	Representor Comments	Council Response
	<p>be located adjacent to existing 'settlements' to reduce the need to travel and reduce emissions. - - New developments should be proportionally distributed between key service centres and key sustainable villages, in the Northern Parishes (i.e. Tarleton). - - Such new sustainable developments, through the development on land, should be considered in the following chronological order: - - i. within existing settlement boundary - ii. Protected Land (that is a logical expansion of existing settlement boundary) - iii. Land released from the Green Belt, where appropriate, provided that the housing needs cannot be met by land within the policies (i and ii above) - - a separate explicit policy to enable residential development on previously developed land within the Green Belt - - Notwithstanding, 'settlements' should include Key Sustainable Villages (i.e Tarleton) and Rural Sustainable Villages (i.e. Mere Brow), as defined in the Adopted Local Plan 2012-2027. - - Given the geographic location of the West Lancashire Borough, it is unreasonable to exclude any development that it is a Flood Zone, provided that it meets the requirements under the NPPG.</p>	
82	<p>Option 4 is essential - and surely not just an option. Option 1 is the most sustainable choice, but - a mixture of Options 1 & 2 decided on a case by case basis could be beneficial but only after maximising the use of existing developments. - - This list would make more sense as priorities rather than options -</p>	Noted
89	<p>Section 3.5 of the Strategic Options Paper considers the precise location of new development within a spatial area. - Option 1 seeks to maximise the capacity of existing settlements by prioritising infill development within the built-up area or by building higher. - Our client does not support this option due to the potentially higher build costs associated with these locations for employment uses, which could render development unviable or require unreasonable and unsightly noise mitigation. - West Lancashire identify that Option 1 could also potentially result in the loss of valuable urban green space or cause the over-development of built up areas. Our Client agrees that these are significant concerns in relation to this option. This policy could result in development which does not accord with section 7 of the Framework and significantly alter the character of the existing settlements. - Option 2 seeks to locate new development adjacent to existing settlements with a view to reducing the need to travel and lessen emissions. This Option is supported by our Clients as this comprises sustainable development in accordance with Paragraph 30 of the Framework which states: - "Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport." - It is acknowledged by West Lancashire, within this Option, that Green Belt release will be required for this development scenario to be delivered. We support the Council and accept the need to release Green Belt around existing settlements to meet the needs of existing and future residents. - Option 3 suggests that a new settlement is built with the necessary infrastructure. - Our Client does not support this option; this would not meet the immediate needs of the Borough as delivery of a Strategic Village would require significant levels of new development which takes time. As detailed above, the study undertaken by Hourigan Connolly in Respect of the Delivery of Urban Extensions concluded that from the point of achieving an allocation it is reasonable to assume it would take a developer approximately 5.5 years to even achieve a start on site. - In addition to the lack of immediate delivery, there would be a significant amount of additional costs associated with development where there is a lack of key infrastructure existing already. This could render development in the rural areas unviable - The adoption of Option 4 would entirely restrict development in areas at risk of flooding. Our Client agrees that this option would conform with the policies in Chapter 10 of the Framework.</p>	Noted

ID	Representor Comments	Council Response
	<p>Restricting development in areas at risk of flooding is supported in principle. However, it is recognised that some small development may be required in order to ensure the vitality and viability of settlements.</p>	
95	<p>3.46 The preferred strategic development option selected by WLBC will inform the spatial framework from which development is to be allocated. However, equally pertinent is the precise location of new development within a spatial area, especially in relation to minimising the impact of new development on the natural environment and planning for the impacts of climate change. WLBC has proposed a series of (not necessarily mutually exclusive) options which are currently being considered, including: - (i) Maximise the capacity of existing settlements by prioritising infill developments within the built-up area or by building higher. - (ii) Locate new development outside of but adjacent to existing settlements to reduce the need to travel and reduce emissions. - (iii) Create brand new settlements with the necessary associated infrastructure. - 3.47 DWH acknowledges the aspiration to focus development within the built-up area of existing settlements and supports the objective of re-using brownfield land. However, there is simply not enough land of this type to meet the housing needs of the Borough and it is not coming forward at anything like the rate needed. This is evident in the slow rate of delivery of new homes in Skelmersdale. In Ormskirk with Aughton, WLBC's evidence identifies a maximum land supply of just 94 dwellings within the existing urban area. Even if there was sufficient land within the existing urban areas to accommodate housing needs, doing so would not necessarily result in a sustainable pattern of growth. Prioritising infill development and/or building upwards would risk the loss of valuable urban green space or cause over-development in existing built-up areas, potentially markedly changing the character of our existing towns and villages. - 3.48 There is therefore a need to undertake the early release of greenfield land alongside ongoing regeneration schemes. This is particularly the case in Ormskirk with Aughton, given the significant shortage of land supply within the existing urban area and the emerging significant economic growth opportunities in the local area. Given that the Green Belt is tightly drawn around the existing urban area, the release of land from the Green Belt for development will be necessary. - Exceptional Circumstances for Green Belt release - 3.49 The Green Belt is not an environmental designation; it is a strategic planning tool which was introduced to manage the growth of urban areas. It is wholly appropriate to revisit Green Belt boundaries when development requirements justify this. Given the critical shortage of deliverable land supply in the Borough, DWH's strong view is that there are likely to be clear "...exceptional circumstances..." (NPPF, paragraph 82) to amend the existing Green Belt boundaries. Those exceptional circumstances are particularly evident in Ormskirk with Aughton; Green Belt releases in the settlement are now critical if it is to grow sustainably, meet its housing needs, and capitalise upon the economic growth opportunities which are available in the local area. - 3.50 WLBC has expressed concerns that Government policy may prevent Green Belt releases from being undertaken unless they relate solely to the minimum baseline demographic needs of the Borough. The Government has recently set out its approach to 'exceptional circumstances' in the Housing White Paper⁸. This states that: - "...authorities should only amend Green Belt boundaries when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements..." (Annex 2) - 3.51 This makes it clear that Green Belt releases can be undertaken to meet the identified 'development requirement' for the Borough, as long as "all other options" for doing so have been explored. A Local Plan development requirement is derived not just in respect of the baseline demographic needs, but also mindful of the forecast economic growth within the relevant area and other emerging growth opportunities. This is one of the 'Core Planning Principles' set out at paragraph 17 of the NPPF, which states that Local Plans should not only seek to meet the objectively identified needs of their areas but should also</p>	Noted

ID	Representor Comments	Council Response
	<p>“...respond positively to wider opportunities for growth...”. - 3.52 For example, in West Lancashire the recent development of Liverpool 2 and the continued development of assets such as Edge Hill University will result in a higher level of economic growth in the Borough, above that captured in baseline economic forecasts. Such growth opportunities will only be successful if they are accompanied by a commensurate level of housing growth. Such housing growth must therefore be factored into the development requirement of the Borough and can justify Green Belt release if there are no other reasonable options to provide it. DWH does not consider that Government would act to prevent a local planning authority from undertaking a Green Belt release if it is necessary in order to secure positive and sustainable growth opportunities. - 3.53 WLBC has set out that it intends to use the previous Green Belt Assessment – prepared in 2011 to inform the current Local Plan – to inform decisions about potential releases. DWH does not agree with this approach. It was prepared over six years ago and there may have been material changes in respect of both the sites to be considered and to the methodology which should be applied, which should be taken into account as part of the Local Plan Review process. The Green Belt Assessment should therefore be updated to ensure that it is capable of forming a robust part of the evidence base. - Approach to regeneration - 3.54 DWH notes that WLBC is raised the prospect of undertaking a Green Belt review to facilitate the delivery of a large-scale urban extension on the edge of Skelmersdale. DWH strongly disagrees with this approach. As set out earlier in this report, there are significant market challenges associated with the viable delivery of a large number of new homes in Skelmersdale. This is evident in the slow rate of delivery experienced in recent years, with large areas of available land being available but unused as a result of the weak market demands in the town. A new large-scale sustainable urban extension on the outskirts of the settlement would need to be accompanied by significant investment in new infrastructure; it is highly unlikely that this would be viable, given the challenges associated with the development of land which is available now and which does not require such investment. - 3.55 WLBC has advised that there are emerging plans to deliver a rail station in Skelmersdale, alongside a branch line on the Kirby-Wigan rail line. This proposal may help to improve the strength of the market in the town in the future. However, it will be many years before such proposals are realised and, even if it is, it is only one of many steps required to address the lack of demand in Skelmersdale. - 3.56 DWH’s strong view is therefore that the delivery of a large-scale urban extension on the edge of Skelmersdale is not a deliverable or justifiable response to the Borough’s growth needs. Even if it was deliverable it would not address the urgent and growing need for new homes in other high demand locations, such as in Ormskirk with Aughton. However, the delivery of new homes in such locations could help to facilitate the regeneration of Skelmersdale. - 3.57 Development in areas of high demand is typically more capable of viably contributing towards the delivery of infrastructure or affordable homes. WLBC could seek to re-direct a proportion of such contributions towards the regeneration efforts in other areas of the Borough where financial returns are more limited in scale. DWH would welcome a discussion with WLBC regarding the feasibility of such an approach, mindful of the legal and financial mechanisms available.</p>	
96	<p>The current Local Plan has largely adopted Option 1, with a refinement wherein development opportunity has - been focused in regeneration areas to encourage investment and vitality. Regrettably, market conditions in areas - such as Skelmersdale have resulted in low housing delivery despite the favourable policy position. - We would therefore suggest that Option 1 would not represent a positive way forward to achieve the ambitions - of the Vision. We would suggest that Option 2 provides a positive way forward and in the case of land at and to - the south of St Joseph’s Seminary provides an opportunity to deliver development adjacent to the settlement - boundary and not requiring any further built development</p>	Noted

ID	Representor Comments	Council Response
	north of the Seminary complex. - Option 3 represents a feasible option only necessary where development cannot be identified under Option 2, - and is not thought necessary at least in the context of the Skelmersdale and Up Holland Spatial Area. We do not - support Objective 4, which runs contrary to founding principles of the planning system which seeks to ensure that - proposals are considered on their merits through a planning balance exercise.	
97	Clearly national policy directs development towards urban areas and indeed defined centres. with respect to commercial development. The experience of West Lancashire through the most recent Local Plan is to give substantial preference to housing development in the Skelmersdale area to support regeneration, and whilst encouraging the town centre expansion it also introduced a mechanism to safeguard the existing retail core which is underperforming. - - The resultant under-delivery of housing and town centre development in Skelmersdale is an unintended consequence, but regrettable. It is recommended that the Council consider a broader range of development options for housing development to include a greater emphasis on areas with stronger market signals to pumpprime delivery including unmet needs for affordable housing. Development for town centre uses should be focused in Skelmersdale town centre and that land identified through a primary shopping area (PSA). The PSA will cement the opportunity for the extension to supplement the existing offer of the Concourse, and must therefore include both the Concourse and the consented extension scheme. - Should the Council conclude that there is merit in progressing a scheme for a retail warehouse park, opportunities to site that in other parts of the current Skelmersdale town centre should be investigated. In the event that a suitable site cannot be identified in the current Skelmersdale town centre area, only at that point should the Council look to progress out-of-centre options.	Noted
99	It is our Clients' view that Green Belt release is essential to meet the future needs of the Borough both in terms of housing and employment. Without Green Belt release, none of these options are possible. It is our Clients' view that Option 2 is the most appropriate option, which relates to locating new development adjacent to existing settlements to reduce the need to travel and reduce emissions. Our Clients' have significant land interests for housing and employment at land to the west of Skelmersdale and it is considered that building a large urban extension to the west of Skelmersdale would be the most appropriate option. Whilst it would result in the inevitable loss of Green Belt, as alluded to previously, Green Belt release is required within West Lancashire to meet the growth aspirations over the Plan period.	Noted
101	I feel extreme caution should be applied in any increase in development in the high flood risk zones. - The Strategic Flood Risk Assessment (Level 1, February 2017) is a very thorough review, but admits (paragraph 9.1 and 9.2) that it takes no account of increased future risk of flooding due to climate change. Although the local plan only covers a few years, we should be considering the lifetime of the housing development - which could easily be up to the end of the century. (Built in 2037 its first mortgage could be till 2067!). By 2100 we can expect sea-level rise of up to around 1 metre [this is my area of expertise, although I don't have explicit figures for the Lancashire coast which may be lower or higher than this global average figure]. This rise may substantially increase the low-lying areas at risk - the spring tide will reach over 6m compared to the Ordnance Survey datum. It will also put increased pressure on flood defences and pumping, so it would be wise to assume that these resources may not continue to be available indefinitely. - There are also possible changes in rainfall, storminess and river flow, all of which make local prediction very difficult and explain why the Environment Agency have not yet carried out the mapping. It is worth bearing in mind that this is an extremely active area of research and improved data may come to light during the lifetime of the Local Plan. - -	Noted

ID	Representor Comments	Council Response
	<p>However I understand the argument that complete rejection of planning in those areas will be damaging to the existing villages, and the older settlements are generally on small areas of higher ground. Is it possible to implement an option that development in these areas is only permissible subject to investment in specific flood-protection measures, at either household or village level? We may choose to build houses on stilts! Sewerage, Power and roads to developments also need protection.</p>	
107	<p>Option 1, could provide solutions to a number of issues. - 1. Building higher level apartments within Ormskirk town centre could provide both privately owned affordable - Housing and the additional population needed to drive rejuvenation. - - 2. This could also work for Skelmersdale which again needs both more affordable housing and a major population increase.</p>	Noted
108	<p>Option 4 seems necessary within the other options. No development should be done in flood risk areas. - Option 1 is the most sustainable and should be done where possible. - Option 2 is the right option in some cases . - This would work better if it was priority list eg - 1. No new development in flood areas - 2. Prioritise infill developments (option 1) - 3.Then use adjacent to existing settlements(option 2) if this was deemed necessary on a case by case basis - - -</p>	Noted
111	<p>Section 3.5 of the Strategic Options Paper considers the precise location of new development - within a spatial area. Option 1 seeks to maximise the capacity of existing settlements by prioritising infill development within the built-up area or by building higher. Our client does not support this option due to the potentially higher build costs associated with taller buildings, which could render development unviable or unable to deliver the required affordable housing and infrastructure required. West Lancashire identify that Option 1 could also potentially result in the loss of valuable urban - green space or cause the over-development of built up areas. Our Client agrees that these are - significant concerns in relation to this option. This policy could result in development which does - not accord with section 7 of the Framework and significantly alters the character of the existing - settlements. Option 2 seeks to locate new development adjacent to existing settlements with a view to - reducing the need to travel and lessen emissions. This Option is supported by our Clients as this - comprises sustainable development in accordance with Paragraph 30 of the Framework which - states: - "Encouragement should be given to solutions which support reductions in - greenhouse gas emissions and reduce congestion. In preparing Local Plans, - local planning authorities should therefore support a pattern of development - which, where reasonable to do so, facilitates the use of sustainable modes of - transport." It is acknowledged by West Lancashire, within this Option, that Green Belt release will be required - for this development scenario to be delivered. We support the Council and accept the need to - release Green Belt around existing settlements to meet the needs of existing and future residents. Option 3 suggests that a new settlement is built with the necessary infrastructure Our Client does not support this option; this would not meet the immediate needs of the Borough - as delivery of a Strategic Village would require significant levels of new development which takes - time. As detailed above, the study undertaken by Hourigan Connolly in Respect of the Delivery - of Urban Extensions concluded that from the point of achieving an allocation it is reasonable to - assume it would take a developer approximately 5.5 years to even achieve a start on site. In addition to the lack of immediate delivery, there would be a significant amount of additional - costs associated with development where there is a lack of key infrastructure existing already. - This could render development in the rural areas unviable. The adoption of Option 4 would entirely restrict development in areas at risk of flooding. Our - Client agrees that this option would conform with the policies in Chapter 10 of the Framework. - Restricting development in areas at risk of flooding is supported in principle. However, it is - recognised that some small development may be</p>	Noted

ID **Representor Comments****Council Response**

	required in order to ensure the vitality and - viability of settlements.	
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Question 14: In your experience, what are the infrastructure and transport constraints in the areas of West Lancashire that you live, work and spend leisure time in? Where is infrastructure and transport well-provided for in West Lancashire and in what way?

ID	Representor Comments	Council Response
9	I chose to move to a semi-rural area therefore I accept that I need to drive to most places. If people want good public transport they should move to a city.	Noted
14	I think this is very important. Transport should be prioritised. - We need better trains, more frequently to Preston, also to link into skem if possible to the proposed new station. - Cycling is positively dangerous along main roads, many more would cycle if it were not so. Allow cyclists to share pavements with pedestrians, link the towns with cycle tracks. - find ways somehow to get people out of their cars for short round town rides.	Noted - the Council recognise that the provision of improved transport and cycling infrastructure alongside new development is important, and the Local Plan will reflect this. The Council's Green Infrastructure & Cycling Strategy sets out a series of proposals that it is hoped can be delivered in West Lancashire to improve cycling if funding can be identified to deliver it.
18	no comment	
20	Although Aughton is well served by railway stations and served by the A59, there are traffic issues on other roads in Aughton which are not designed to carry large numbers of vehicular traffic and would certainly not be able to cope with such an increase brought about by a large influx of new housing developments.	Noted
24	As above, I think priority should be given to Skelmersdale in all areas, to make it a better place to live, to improve transport (train particularly), to provided better and more housing.	Noted
26	No comment	
28	The road infrastructure is adequate and serves the needs of business and industry based on the existing industrial estates and service centres. - Rail linkage is poor and the plan for a rail station at Skelmersdale would have limited impact on Up Holland. - - Investment in environmental corridors, walkways and cycleways should be a major priority. - This includes pavements alongside existing roads to link residential areas with service centres.	Noted
30	Please see suggestion previously made about parking at Pimbo for Up Holland Station. Educational provision in Skelmersdale is poor and has declined while I have lived here. It is not now possible to study for "A" levels. The closure of Glenburn and loss of its sporting facilities is regretted. Land must be made available in the new plan for a new school on the former Westbank/Glenburn site, easily accessed on foot. It is not sustainable to encourage children to travel out of town for education. Lathom High had to provide "temporary shed accommodation to accommodate children displaced from Glenburn. Not an attractive option and one that will not encourage people to buy on the new development at Woodlands. Should the new Skem Town Centr station ever materialise it will need to be supported by a multistory car park. To create a 500 place Park and Ride Car Park will involve destruction of all town centre playing pitches. An attractive feature and major design feature of the New Town plan. It gives a good impression when entering from the M58. I	Noted
31	I live in Tarleton, close to the boundary with Hesketh Lane. The Local Plan acknowledges Hesketh Lane as one of the three most congested roads in West Lancashire. It typically grinds to a halt twice per day during school term times. Cycle travel around the villages of Tarleton and Hesketh bank is hazardous. I do not believe the proposed Green Lane link would allieviate the problems as this would be mainly of benefit to commercial hauliers that	Noted

ID	Representor Comments	Council Response
	mostly avoid Hesketh Lane at peak times.	
32	<p>There are significant infrastructure issues in the Northern Parishes. Hesketh Lane can barely cope with the traffic it is currently handling, it was not designed to handle the amount of traffic it now sees on a daily basis. - Tarleton village centre struggles with large lorries going back and forth to growers in the area. - There are also drainage issues, as well regular problems with water pressure. - I travel to work from Tarleton to both Ormskirk and Upholland the roads are in very poor repair and although they are being patched up this is not adequate. - Skelmersdale has an excellent road network and motorway access.</p>	Noted
34	<p>When the site allocations are at a stage ready for consultation, we will be happy to review future site allocations against our remit and associated environmental constraints. We would request advance notification of an upcoming consultation where possible and that shape files are provided to allow for efficient analysis.</p>	Noted
35	<p>As discussed throughout these representations, it is recognised that infrastructure within some locations of the Borough, including within Burscough, may be close to capacity or in need of upgrading/improvement works. Where new development is proposed, it may be possible for improvements to infrastructure to be undertaken to mitigate the impacts and in conjunction with the Council, could result in upgrades to benefit the wider community. - The opportunities for such should be given careful consideration, although it must be the case that contributions made towards infrastructure improvements as a result of a development are proportionate to the development coming forward.</p>	Noted
39	<p>Response A– The constraints in Halsall are poor quality network of rural roads (Moss Roads) which with current driving speed limits represent a serious safety hazard with deep drainage ditches abutting roads and numerous accidents recorded and barely able to serve the agricultural vehicles serving those areas. - - The lack of bus service to Shirdley Hill providing a severe mobility problem for many elderly residents and employees and visitors to businesses and the hospital situated in the area,exacerbated by lack of pavements on roads used by Southport and Ormskirk traffic. - - Lack of suitable drainage provision to numerous areas in Halsall causing localised flooding (sewage) to Housing situated within the village and at it borders. -</p>	Noted
42	<p>Our core charitable concern is the current lack of a strategic and integrated approach to West Lancashire's green infrastructure. Such an approach would include the identification of the location and types of current green infrastructure within, adjacent to and crossing the borough, the ecosystem services each delivers, and the current gaps in green infrastructure provision and maintenance; and the related efficient and effective delivery of ecosystem services at the times and places where these are most needed.</p>	Noted. The Council do have a Green Infrastructure & Cycling Strategy and have sought to ensure that the Ecological Networks previously identified by the Wildlife Trust for Lancashire County Council are not unduly affected by the proposed GI network.
46	<p>There are significant infrastructure restraints throughout the rural areas of the borough and even within some of the main settlement centres, especially Burscough where the highways, drainage and sewage facilities are at or near capacity. The northern Parishes suffer from being in effect 'terminus' settlements as most residents are employed outside of where they live and thus there is a commuter style of living which has the effect of producing dormitory settlements leading to traffic congestion.</p>	
48	<p>Finance is the main constraint. Affordable, regular and targetted bus routes would encourage greater use. Better and affordable train links from Ormskirk to Southport, Preston, Skelmersdale and Manchester would reduce the need and use of private car use. Lack of a regional public transport system does discriminate against the least well off and reinforces social segregation. The decline of Ormskirk town centre as a market and shopping centre should be addressed.</p>	Noted

ID	Representor Comments	Council Response
57	Effective public transport is non-existent in the majority of this rural borough and this is highly unlikely to change. Therefore, the needs of private transport (ie private cars, etc) needs to be properly planned for.	Noted, although the Local Plan seek to see public transport provision improved alongside new development and cannot be overly-reliant on a rural highway network which is not always suitable for taking significantly more traffic than existing.
61	In the Northern parishes road infrastructure is poor, particularly Hesketh Lane , the one road between Tarleton & Hesketh Bank. - Even the A59 , the main road between Preston & Ormskirk struggles to deal with the existing volume of traffic. An accident or road works on or near Bank Bridge on A59 can cause major traffic delays and disruption. - In addition, water pressure is low in Hesketh Bank & Tarleton. - The proposal to switch off pumping stations is a major concern for potential flooding in Rufford.	Noted
64	Our Clients understand the need for developer contributions to help secure both on and off site infrastructure provision, where this is necessary to make development acceptable in planning terms. It is a well-documented position that there are infrastructure constraints within Skelmersdale and the wider Borough, many of which could be addressed by improvements to the infrastructure throughout the Borough. These constraints are identified within the Draft Infrastructure Delivery Plan ("IDP"). - - The Council should ensure that the emerging Local Plan can facilitate the level of infrastructure needed to prevent delays in delivering housing sites. Emerging Local Plan policies should ensure that they are not so onerous that they restrict or delay delivery. - - Further details are required as to how the adopted Community Infrastructure Levy will apply to new developments, including strategic sites. - - We support the Council's position that the IDP is an evolving document which will be updated as part of the Council's evidence base.	Noted
69	The reductions over recent years in our already-limited public transport is a severe constraint on people needing or wishing to travel for work, shopping, and all services, around the borough or to and from adjacent places/regions [apart from those able to access the Merseyrail trains between Ormskirk and Liverpool.] - - This is a significant factor in reducing the footfall and thus the economic success of Ormskirk market and town centre shops, for example, to the detriment of largely independent and local businesses. The absence of any convenient rail services or station has held back the potential development of Skelmersdale. Bus services are few and far between now, and fail to connect the town and activity centres with the outlying villages and rural areas. - - Lack of public transport discriminates sharply and in multiple ways against those least economically and socially advantaged - e.g. those who most need jobs are less likely to be able to run a car . - - For those who need to make work or social journeys in the evenings or on Sundays, there are few if any "non-car" options. - - Road haulage based businesses (and longer distance commuters using cars) here appear to be better provided for, with an adequate motorway coverage/connections and adjacent industrial/distribution sites.	Noted
70	The provision of infrastructure is important to support future development and growth; - however, the Commissioners believe that the phasing of such infrastructure will be key to - ensuring that house building is not unduly delayed and that the infrastructure burden is not - so high as to make providing new homes unviable. - - Key to this for some sites will be maximising existing infrastructure, transport and services - that are already present in the area (particularly in urban areas). For instance, the nearby - town of Ainsdale in Sefton has such infrastructure which would make new development on the - settlement's edge a deliverable prospect. This is commensurate with the need to locate - development in this area as expressed in our comments above. - - We note that the vast majority of Borough-wide infrastructure can be provided through the - adopted Community Infrastructure Levy ("CIL") which was last updated in November	Noted

ID	Representor Comments	Council Response
	<p>2016. It - may be that a further update to the Regulation 123 list is required depending on which - scenarios/options are chosen for the Local Plan Review. We note that the Council has - undertaken an Infrastructure Delivery Plan and would expect this to guide any further changes - to CIL. - - As this is the case, this would mean any further infrastructure required to support development - should be site-specific in nature and as such, the scope and timing of such contributions is - best discussed through the development management process (along with other potential - contributions such as affordable housing).</p>	
72	<p>Where possible you should focus development close to Grid and Primary Electricity substations to reduce the physical size and ecological damage of the Electricity Grid and to take up existing transformer capacity before the existing cheaper electricity capacity is taken up by adjoining Local Authorities such as Chorley and Wigan which are competing with West Lancashire for economic growth and prosperity.</p>	Noted
74	<p>Spreading development across the Borough, on more smaller sites can reduce the need for major significant infrastructure requirements, with existing capacity more likely to be able to meet development needs. The spread across the Borough also reduces the potential for a particular location to feel the burden of providing the majority of new development over a long period, particularly where associated infrastructure may be phased.</p>	Noted
75	<p>Road Safety - The draft of the local plan should recognise the issue of road safety more prominently. Killed and Seriously Injured (KSI) levels are only currently represented as an indicator within the Sustainability Appraisal, but are not referenced within the Issues and Options papers. - Figure 1 displays KSI casualties for West Lancashire between 2009 and 2014, with the district level significantly worse than the England average. - Figure 1 Killed and Seriously Injured (KSI) casualties on England's roads – West Lancashire between 2009 and 2014. (see charts on PDF) - - It is recommended that highway safety should be a key area for consideration when preparing the Preferred Options Paper. This will help West Lancashire to deliver healthier communities in accordance with National Planning Policy Framework. - The plan preparation should properly consider existing evidence on KSIs, with a view to supporting the Towards Zero Lancashire Road Safety Strategyiii which recommends a Safe Systems approach. - - Increasing road safety has the opportunity to not only reduce the number of road casualties but could also facilitate increased uptake in active travel and physical activity, through the provision of a safe highway system and public realm.</p>	Noted
77	<p>Within the Skelmersdale area where infrastructure is in place and not in small villages such as Appley Bridge, Parbold, Newburgh where roads/drains are already ruined.</p>	Noted
78	<p>The good roads around Skelmersdale and M58 should be maximised. Most villages suitable only for light industry - no roads! Appley/Parbold/Newburgh roads and drains destroyed by traffic far too heavy.</p>	Noted
81	<p>As set out at Para. 2.36 of the Adopted West Lancashire Local Plan (2012-2027), a Key Issue identified "there are issues with traffic congestion in the two villages, particularly along the main Hesketh Lane/Station Road route. HGV's accessing agricultural and produce/packing facilities combine with local traffic, particularly at peak times, and can cause significant problems." - - In addition, the West Lancashire Highways and Transport Masterplan 2013 sets out the vision of constructing the Green Lane Link and route management strategy, as a direct solution to the infrastructure constraints associated with the Northern Parishes. - - It is evident that the Green Lane Link nor a route management strategy has been implemented and it is critical that this is delivered through the emerging Local Plan and is maintained as a key issue in order to support the agricultural and food</p>	Noted - delivery of the Green Lane Link and other proposals emerging from the Highways & Transport Masterplan are the responsibility of Lancashire County Council, although the Borough Council would also support the need for the implementation of such transport and highways schemes.

ID	Representor Comments	Council Response
	processing industry in the Northern Parishes.	
82	Public transport - reduced bus services, especially to Skelmersdale is forcing people into cars. This makes commuting too expensive for those on low wages and is a major disincentive to taking up employment opportunities. The lack of affordable public transport also affects the elderly and disabled causing social exclusion and associated health problems.	Noted
83	I think to make the Skem housing market stronger you need a railway to link it properly to both Manchester and Liverpool so that as well as being a place to live for working locally it can also attract commuters for work and access cultural events in the major cities by sustainable public transport that runs regularly into the evening. To safely access the railway station the footpaths across skelmersdale would need making safe to use at night by adding LED lighting and upgrading them so they feel safe in the dark. (eg install CCTV from the police station and improve sight lines by removing dark trees. - - The third rail electric from Kirkby should be extended out into a station by Skem library and nye bevan pools. The Northern rail should be converted to a metrolink tram running through Wigan and into Manchester via Atherton/Walkden. - This would give Skem the pulling power of a commuter town like Parbold and Burscough- but additionally with the local motorway links being good for business too. Skem should put itself forward ahead of other distribution centres that are getting set up in Ashton or fringes of St Helens as the correct place for new development rather than other cluttered fringes of the M6 corridor. - It would also allow skem folk opportunities to work in the bigger cities which currently they cannot get to owing to the bad rail link from Upholland station. - I think the electric railway from Ormskirk should be extended to Burscough with a new station where the line cuts under the A5209 - this would serve the proposed new housing near to the old airfield industrial estate so that commuters for liverpool do not drive to work down the A59. The end station to the line should be at Burscough bridge by using the curves so that the diesel to Preston starts also at burscough bridge. - Ormskirk Skem and Burscough should have plans for cycle routes safe from the main roads to get to the railway stations and to the schools and hospitals with cycle parking at the main stations. cycle route from back of edge hill to ormskirk town centre uisng ruff lane also serving the hospital. - - Relocate ormskirk railway station or make a good walking route from the station into the town centre -	Noted
87	Burscough Parish Council is extremely concerned about the impact of new development on risk of surface water flooding and flooding from sewers. The Parish Council welcomes discussions regarding this and sharing information. The key issue for the local plan should be the improvement of Skelmersdale, so that it is a town that West Lancs can be truly proud of, and a place where residents want to live. This is achievable, but only if all our efforts are put into this. Otherwise it will never change.	Noted
89	Section 3.7 provides infrastructure delivery options to identify what infrastructure and services will be required to support new development within the Plan Period. Paragraph 3.7.3 states the following: - "The new Local Plan will cover the period to at least 2037, and will inevitably involve further housing and employment land development, over and above that set out in the 2012-2017 Local Plan..." - It is agreed that further infrastructure will be required to support development across the Borough, the level and nature of the improvements will be wholly dependent on the strategic development options chosen. Each infrastructure scenario responds directly to the development distribution scenarios 1 – 4 which are discussed above. - Development distribution Scenario 1 perpetuates existing patterns of development. Section 3.7 of the report identifies the following: - "For the higher development requirements (e.g Options D and E) and the longer plan period (Option 2), it is probable that just about all	Noted

spare existing infrastructure capacity would be 'used up' in all settlements. However, even for the lower development requirements it is highly likely that this scenario would require the significant improvements to infrastructure such as waste water treatment serving Ormskirk and Burscough..." - We accept that development within existing settlements would be likely to require improvements to existing infrastructure. It is recommended that the CIL charging schedule is revised once a development scenario and sites are selected to ensure that settlements can accommodate growth. - Development distribution Scenario 2 sought to focus new development in and around the Key Service centres of Skelmersdale, Ormskirk with Aughton and Burscough. As is identified within the discussion above, development within existing settlements will require infrastructure improvements. A review of CIL is supported to ensure this can be delivered, it is therefore suggested that development is focused in higher value areas to ensure that the level of infrastructure required across the Borough can be achieved, potentially through additional Section 106 contributions. - Our client agrees with West Lancashire's statement within Paragraph 3.7.10: - "...scenario 2 would accelerate the importance of transport improvements at these locations, particularly the need to review the road network to ease traffic congestion around Ormskirk and provide a new railway station at Skelmersdale. As a focus for public transport to serve surrounding areas these settlements would also benefit from improved interchanges between different modes of transport, for example from car to bus and/or to rail. This may include the provision/ improvement of park and ride facilities in key locations (such as rail stations)" - We agree that development in the key service centres will result in resolutions to existing infrastructure problems and therefore scenario 2 is the preferred scenario - Development distribution Scenario 3 focusses development within the rural areas. As has been previously discussed this scenario is not supported by our Client. West Lancashire identifies that this development distribution scenario would result in the need to introduce new infrastructure in locations where it does not currently exist. We identified previously that the provision of new infrastructure could result in additional abnormal costs which may render this development scenario unviable. - Within section 3.7 of the Strategic Options Paper, West Lancashire confirm that enhancing existing provision is easier than creating it 'from scratch'. This is confirmed further within Paragraph 3.7.11 which states: "Scenario 3 would involve more development in rural areas and would require greater emphasis upon improvements to rail and bus services in these areas whilst managing increased usage of rural roads. The challenge would be to improve transport over a wide area, especially public transport. " - Our clients agree with this assertion and would add that this renders development distribution scenario 3 unviable. Development distribution Scenario 4 built on scenario 2 but with a greater proportion of development to be delivered in Skelmersdale. West Lancashire suggest that this would ensure existing problems are not exacerbated to any great extent. We disagree strongly with this statement; existing infrastructure problems should be identified and development which can provide infrastructure delivery to improve these issues should be preferred to deliver benefits for existing and proposed residents of West Lancashire. Paragraph 3.7.12 of the Strategic paper states: - "Focussing development at Skelmersdale under scenario 4 would give increased support to the proposed Skelmersdale Rail Link and new railway station and could potentially minimise the increased demand on congested routes in other parts of the Borough." Our client does not support development distribution scenario 4. As is identified within the adopted CIL charging schedule development in Skelmersdale cannot contribute towards CIL payments. This scenario will not provide enough CIL monies to deliver new infrastructure within Skelmersdale let alone elsewhere within the Borough and therefore the infrastructure required to improve quality of life will not be achieved. In order for West Lancashire to achieve a new Rail Link within Skelmersdale development within higher value areas would need to be identified. - Paragraph 3.7.6 of the Strategic Paper identifies that siting

ID	Representor Comments	Council Response
	<p>new development where it is well located or can be made to be well located in relation to the transport network. Our Client agrees with this statement as it conforms fully with Paragraph 30 of the Framework. Development within Burscough would make best use of existing transport facilities.</p>	
92	<p>The strategic direction set by the Local Plan should be a balanced and sustainable development approach towards integrating land use and transport, regeneration and economic development, social inclusion and help tackle climate change. - - It should provide for the integration of land use and transport planning. For example location of development in accessible locations, use of TRACC software to assist with this, developments based around the need for access by all forms of transport, management of parking in new development, expectation that developers should contribute to cost of public transport access in areas that are not well served by existing public transport services. - - We welcome the transport policies outlined in the document. We note that you have mentioned the Local Transport Plan and Transport Plan for Growth but it would be useful to additionally make reference to other related transport strategies of the Liverpool City Region such as the Rail Strategy, Bus Strategy, Local Journeys Strategy, Freight & Logistics Strategy, etc. We are also working closely with Lancashire County Council on the proposals for a new rail line to and station at Skelmersdale. - - Spatial Planning shapes the places where people live and work and the country we live in. Good planning ensures that we get the right development, in the right place and at the right time. It makes a positive difference to people's lives and helps to deliver homes, jobs and better opportunities for all, whilst protecting and enhancing the natural and historic environment and conserving the countryside and open spaces that are vital resources for everyone. But poor planning can result in a legacy for current and future generations of run-down town centres, unsafe and dilapidated housing, crime and disorder, retrofitting of sustainable transport solutions and the loss of our finest countryside and green spaces to development. - Housing provision needs to reflect the economic ambition put forward in the City Region Growth Strategy and the Government's Industrial Strategy. Housing is just one element of many that go towards creating sustainable communities; it is not the only or most important element. All the various elements are of equal importance eg health, education, shops, community facilities, etc. Delivering just houses and not communities will just create dormitory suburbs and towns and so lead to greater commuting and long distance commuting; this will then have significant implications for the transport infrastructure. Currently across the UK there is a major shortage of affordable housing and housing to meet the diversity of everyone's needs. It is clear that there is a housing crisis caused due to a growing population and the failure to replace sold-off council stock over the past decades. Add to that greater numbers of students living away from the family home, as well as the increasing cost of housing relative to average incomes, and government estimates show that we need to build at least 225,000 homes per year to keep up with population growth and start to tackle years of undersupply, and this needs to be done as economically as possible. A comprehensive package of bold and transformative actions needs to be urgently delivered to address this housing crisis. If not people will be forced to live further and further away from their place of work and this will lead to greater commuting adding to the transport challenges. Not tackling this housing crisis adequately will compromise our nation's economic ambitions. - - Critical issues include land availability, finance availability, time taken from planning approval to delivery of new homes, affordable housing (that stays affordable for long term) and diversity of housing types and tenures, etc. Often there is a time lag between developers gaining planning approval and completion of the physical houses on the ground. Really we need to reduce this time to the minimum so that houses are actually delivered. One option to explore to speed up delivery of new housing could be factory built modular homes. These are far removed from</p>	Noted

ID	Representor Comments	Council Response
	<p>the old postwar prefabs and today are attractive, versatile, highly energy efficient and can easily be customised to the customer's specification. Such methods are commonplace in countries such as Sweden, Germany, Austria and the Baltic States. Here in the UK a number of providers such as Legal & General Homes are already exploring this to revolutionise the home building industry by providing precision engineered factory manufactured houses.</p>	
96	<p>AIUH note that in certain parts of the Borough that there are challenges in terms of public transport (i.e. the lack of a rail station in Skelmersdale and operational matters in terms of the timetable for bus services in that area) - and connectivity to the regional road network. In the context of Up Holland, there is excellent connectivity to the - regional road network, and public transport services include a local train station and bus services. - A more substantive infrastructure constraint is the fundamental lack of housing readily available in the - marketplace which is affordable. This drives up values yet further in terms of the stock which is available, and - results in the adverse affordability ratios. The HEDNA evidence base document sets out a startling affordable - housing need of circa 540 units per annum which is consistent with the above analysis. It is crucial to break this - cycle and deliver more housing in locations which have stronger market signals and where any adverse planning - effects can be weighed in the balance to arrive at a positive allocation.</p>	Noted
97	<p>St. Modwen note that in certain parts of the Borough that there are challenges in terms of public transport (i.e. the lack of a rail station in Skelmersdale). St. Modwen is encouraged that there is a clear objective to take forward the rail station for Skelmersdale and concludes that this will act as a catalyst to redress other operational matters in terms of the timetable for bus services in that area.</p>	Noted
99	<p>Our Clients understand the need for developer contributions to help secure both on and off site infrastructure provision, where this is necessary to make development acceptable in planning terms. It is a well-documented position that there are infrastructure constraints within Skelmersdale and the wider Borough, many of which could be addressed by improvements to the infrastructure throughout the Borough. These constraints are identified within the Draft Infrastructure Delivery Plan ("IDP"). The Council should ensure that the emerging Local Plan can facilitate the level of infrastructure needed to prevent delays in delivering housing sites. Emerging Local Plan policies should ensure that they are not so onerous that they restrict or delay delivery. Further details are required as to how the adopted Community Infrastructure Levy will apply to new developments, including strategic sites. We support the Council's position that the IDP is an evolving document which will be updated as part of the Council's evidence base.</p>	Noted
101	<p>The discussion of plan options superficially assume that everyone works locally... I'm sure it has been considered that this is not realistic. - At the moment there is good public transport to Liverpool from Ormskirk, and some (quick but infrequent) from Burscough and Rufford. There is fair public transport from Burscough and Parbold to Manchester. But public transport from Parbold to Liverpool is poor, and from Skelmersdale to Liverpool very poor, considering the size of the population. It shouldn't take 90 minutes to travel 15 miles between town centres. Any move to improve public transport should be encouraged. - Cycle routes in West Lancashire, outside Skelmersdale, are very poor. Some of the back lanes and sections of towpath provide safe routes, but in general cyclists are forced to share narrow roads with heavy (both senses) traffic. Considering the flatness of the borough, this is an area ripe for development to improve sustainable transport and public health. - Regarding both this and my answer to section 13, West Lancashire could perhaps learn many lessons from the Netherlands.</p>	Noted

ID	Representor Comments	Council Response
108	<p>Reduced bus services to Skelmersdale is a huge problem. - Reduced bus services across the borough especially to rural areas has had a big impact. - Good train links to Liverpool although we pay more than Merseyside. - - -</p>	Noted
111	<p>Section 3.7 provides infrastructure delivery options to identify what infrastructure and services will - be required to support new development within the Plan Period. Paragraph 3.7.3 states the - following: “The new Local Plan will cover the period to at least 2037, and will inevitably - involve further housing and employment land development, over and above - that set out in the 2012-2017 Local Plan...” It is agreed that further infrastructure will be required to support development across the Borough, - the level and nature of the improvements will be wholly dependent on the strategic development - options chosen. Each infrastructure scenario responds directly to the development distribution - scenarios 1 – 4 which are discussed above. Development distribution Scenario 1 perpetuates existing patterns of development. Section 3.7 - of the report identifies the following:“For the higher development requirements (e.g Options D and E) and the - longer plan period (Option 2), it is probable that just about all spare existing - infrastructure capacity would be ‘used up’ in all settlements. However, even - for the lower development requirements it is highly likely that this scenario - would require the significant improvements to infrastructure such as waste - water treatment serving Ormskirk and Burscough...” We accept that development within existing settlements would be likely to require improvements - to existing infrastructure. It is recommended that the CIL charging schedule is revised once a - development scenario and sites are selected to ensure that settlements can accommodate - growth. Development distribution Scenario 2 sought to focus new development in and around the Key - Service centres of Skelmersdale, Ormskirk with Aughton and Burscough. As is identified within - the discussion above, development within existing settlements will require infrastructure - improvements. A review of CIL is supported to ensure this can be delivered, it is therefore - suggested that development is focused in higher value areas to ensure that the level of - infrastructure required across the Borough can be achieved, potentially through additional Section - 106 contributions. Our client agrees with West Lancashire’s statement within Paragraph 3.7.10: - ...scenario 2 would accelerate the importance of transport improvements at - these locations, particularly the need to review the road network to ease traffic - congestion around Ormskirk and provide a new railway station at - Skelmersdale. As a focus for public transport to serve surrounding areas - these settlements would also benefit from improved interchanges between - different modes of transport, for example from car to bus and/or to rail. This - may include the provision/ improvement of park and ride facilities in key - locations (such as rail stations)” We agree that development in the key service centres will result in resolutions to existing - infrastructure problems and therefore scenario 2 is the preferred scenario. Development distribution Scenario 3 focusses development within the rural areas. As has been - previously discussed this scenario is not supported by our Client. West Lancashire identifies that - this development distribution scenario would result in the need to introduce new infrastructure in - locations where it does not currently exist. We identified previously that the provision of new - infrastructure could result in additional abnormal costs which may render this development - scenario unviable. Within section 3.7 of the Strategic Options Paper, West Lancashire confirm that enhancing - existing provision is easier than creating it ‘from scratch’. This is confirmed further within - Paragraph 3.7.11 which states: - “Scenario 3 would involve more development in rural areas and would require - greater emphasis upon improvements to rail and bus services in these areas - whilst managing increased usage of rural roads. The challenge would be to - improve transport over a wide area, especially public transport. “ Our clients agree with this assertion and would add that this renders development distribution - scenario 3 unviable. Development distribution</p>	Noted

ID	Representor Comments	Council Response
	<p>Scenario 4 built on scenario 2 but with a greater proportion of development to be delivered in Skelmersdale. West Lancashire suggest that this would ensure existing problems are not exacerbated to any great extent. We disagree strongly with this statement; existing infrastructure problems should be identified and development which can - provide infrastructure delivery to improve these issues should be preferred to deliver benefits for - existing and proposed residents of West Lancashire. Paragraph 3.7.12 of the Strategic paper states: - "Focussing development at Skelmersdale under scenario 4 would give - increased support to the proposed Skelmersdale Rail Link and new railway - station and could potentially minimise the increased demand on congested - routes in other parts of the Borough." Our client does not support development distribution scenario 4. As is identified within the - adopted CIL charging schedule development in Skelmersdale cannot contribute towards CIL - payments. This scenario will not provide enough CIL monies to deliver new infrastructure within - Skelmersdale let alone elsewhere within the borough and therefore the infrastructure required to - improve quality of life will not be achieved. In order for West Lancashire to achieve a new Rail - Link within Skelmersdale development within higher value areas would need to be identified. Paragraph 3.7.6 of the Strategic Paper identifies that situating new development where it is well - located or can be made to be well located in relation to the transport network. Our Client agrees - with this statement as it conforms fully with Paragraph 30 of the Framework. Development within - Aughton would make best use of existing transport facilities.</p>	
112	<p>I write these few comments on planning ideas for the years 2027-2037 and beyond with the background of 2012-2027 Plan ringing in one's mind and the effects of that plan still felt by all the people of Burscough. - I attended The Grove meeting of 27/3/17 where an insight was given into the future requirements of government in relation to Planning matters. I did speak with Mr MacFarlane 24/3/17 and with Mr Bengel 28/4/17 as well as they being at the Grove meeting so they will have an insight into my comments. I will document the main items of concern over current position especially in relation to completion let alone implementation of the 2012-2027 Plan, particularly those mentioned below. - 1st Road improvements to alleviate the dangers of Industrial Estate Traffic - a) en route to M6 via A5209 with severe overloading of Square Lane - Newburgh - b) for access to M58 via B5240 Square Lane again to Hall Lane - c) Access to M58 via the more westerly route has an 18T weight limit in Ormskirk. - d) So we need a link from Burscough to M6 and M58 which reduces volume of TRAFFIC on A59 through Burscough between the "Tesco" island and the "Booths" roundabout, a better link to M6 for northern areas and one also for M58 for the southern part of A59 to relieve the ever long suffering Burscough Town and Square Lane residents. - WE DO NOT NEED A BYPASS just better access to M6 and M58. This could well be helped by the ideas mooted for handling of residents' traffic that will come from the Yew Tree Farm houses. We shall see what happens to the 5 schools' access for 190 days per year when traffic lights are installed at the Higgins Lane junction with the A59. - - Item II - Another major issue with any further development to the Burscough and local area is the still unresolved issues with the flow of water under the railway on its way to the sea and Crossens Pumping Station. This is a real problem in times of heavy rainfall. - The sewerage works at New Lane are now taking vast areas of foul water from Rufford to the north, Scarisbrick in the west and Ormskirk in the south causing problems in fields in times of heavy usage in wet weather. - - Now to general ideas: - Item III - "Enough is enough" in the Burscough area. At present until the 2012-2027 Local Plan is nearing completion we do not want or need any more urbanisation forced upon us in our village and surrounding. - So what about present plans with the football pitch and area between the bridges? - Ideas: - 1) A Venetian style pedestrian bridge over canal from Library to Wharf with a multi-storey car park adjacent. This would reduce people walking over the A59 bridge in arms distance of 42</p>	Noted

ID	Representor Comments	Council Response
	<p>ton artics which are causing subsidence on the bridge very close to buildings and mothers with prams. - 2) Another thought the church grave yard to east of railway bridge is nearly full and there is waste land adjacent to it on its northern side. - 3)What is [the] future for [the] area around [the] station and its now unused new ticket office; could that area be used to better advantage? - With these comments I close thisquickly written letter hoping that the ideas of an 82 year old whose family have lived and farmed in the village for over 100 years may be of benefit to a new type village of yesteryear. - Thank you</p>	

Question 15: Which policy option or options above for how we should allocated land for employment sites do you think is the most appropriate for West Lancashire? Why? Is there an alternative option that you think is appropriate that has not been considered? If so, what?

ID	Representor Comments	Council Response
1	Option 2 we feel would be better	Noted.
12	Option 1 - Make use of derelict scrubland ie brown belt rather than green	Comments noted. As a general principle, brownfield land is a 'first port of call' when looking for land for new employment sites, but other factors mean that it is often necessary to use greenfield sites.
14	I would think all the options important and to be encouraged	Comments noted.
18	no comment	-
20	Option 1: Allocate sites specifically for strategic distribution and warehousing needs.....and the further opportunity to increase the development of Skelmersdale.	Comments noted.
21	Don't need employment sites - we need food production.	Comments noted. The importance of food production is acknowledged, especially in an area like West Lancashire with much prime agricultural land. However, there is considered to be a need for employment sites as well.
23	Option 1. - Location of warehousing near the M58 is appropriate	Comments noted.
24	Option 1 would seem to point to Skelmersdale as it has good motorway links and the land to accommodate large business premises. However, public transport is poor so encouraging businesses within the Skelmersdale area, which would be easy to reach by the local workforce, would be desirable.	Comments noted. The issue would be finding appropriate land / sites within Skelmersdale to fulfil this function.
26	<p>ECONOMIC IMPACT</p> <p>In 2010, sport and sport-related activity contributed £20.3 billion to the English economy – 1.9% of the England total. The contribution to employment is even greater – sport and sport-related activity is estimated to support over 400,000 full-time equivalent jobs, 2.3% of all jobs in England.</p> <p>'Traditional' jobs have changed and there is a growing job market created around sport. In West Lancashire in 2013 it was estimated that there was 462 jobs created directly in the sports industry and 580 jobs created indirectly. This equated to £18.8m and £23.7m respectively.</p> <p>The following link will give the details behind these figures:https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/</p>	Comments on sports-related jobs noted. The SHELMA study looks at needs for future employment land, based on an analysis of all sectors of employment.
28	Option 3	Noted.
30	There are sufficient warehouses underused on Pimbo for strategic distribution needs. The fact that Matalan warehouse has remained empty suggests there is no demand for more such large warehouses, A mixtire of options 2 and 4 if evidence of demand exists. There is a need to develop more highly skilled/graduate employment opportunities in Skelmersdale	Comments noted. There is expected to be a significant increase in demand for warehousing / logistics linked to the Liverpool2 Superport. It is agreed that there is a need to develop more highly skilled / graduate employment opportunities in Skelmersdale.
31	In order of preference, options 2, 1 & 3 - not option 4	Comments noted.
32	Rural and agricultural land in the borough needs to be protected, with growth in population comes higher demand for food production. Option 3	Comments on options 3 and 4 noted. The importance of food production is

ID	Representor Comments	Council Response
	allocating new sites for B class use seems appropriate for most areas, keeping work close to already built up areas. Option 4 increasing town centre office work, this can help redevelop run down town centres and provide work without impacting on already straining infrastructure.	acknowledged, especially in an area like West Lancashire with a high proportion of prime agricultural land.
39	<p>Response re :- Options 1,3 and 4 ...comments added</p> <p>1.Strategic distribution and warehouse needs specific allocation of sites likely in M58 Skelmersdale corridor.</p> <p>Comment ...agreed</p> <p>3. Allocate sites in all areas according to use class (1 – 4). Comment ...Business units for SMEs are required in all areas.</p> <p>4.Allocate sites around town centres for all business / employment use.</p> <p>Comment ..Due to the Victorian design and size of town centres, expansion is now an issue. Town centre rates, poor and expensive parking provision deters businesses to take up town centre units.</p>	Comments on Options 1,3 and 4 noted, including agreement re. M58 corridor and the need to encourage SMEs across the Borough. Comments on town centres acknowledged; Skelmersdale is different from the others, being a New Town.
42	We have no comment at this time.	Noted.
46	The above options should not necessarily be mutually exclusive, achieving the right balance of types of employment and economic activity will impact on the quality and range of housing and so lead to much better balance communities. Being aware of the different employment needs of the borough needs to take into account the differing existing areas of economic activities, i.e. the growing industry and related business in the rural sectors.	Comments noted. It is agreed that the options are not mutually exclusive, that there is a need for different types of jobs, and for different types of employment in the different areas of the Borough to achieve sustainable mixed communities.
47	I feel we should move away from factory fodder and warehousing jobs. I would like to see more attention give to land uses which facilitate rural livelihoods, such as local food production, agroforestry and woodland crafts. Integrated, self-sufficient developments in rural areas. Also, more skilled jobs including a big emphasis on entrepreneurship and self-employment. And non-polluting businesses, which could more easily be located in close proximity to housing.	Comments acknowledged. Whilst there is support for small / rural businesses, and non-polluting businesses that can be located close to housing, there is also considered to be a need for the larger / 'traditional' jobs, especially in the light of the Liverpool2 'Superport'.
48	Option 1 should be principally targetted at Skelmersdale with its good transport links to M58 and M6. Allocate B class users to industrial zoned areas like Burscough and other smaller trading estates in and around Ormskirk and Tarleton.	Comments noted / acknowledged.
50	<p>Providing the Right Scale, Mix, and Distribution of Employment Land</p> <p>However, the first Economic Policy Issue, Providing the Right Scale, Mix, and Distribution of Employment Land, does present the potential for impacts on the SRN. The Economic Policies Topic Paper presents four options on what type of employment land is required and where specific types may be appropriate. These options are summarised as:</p> <ol style="list-style-type: none"> 1. Allocate sites specifically for strategic distribution and warehousing needs; 2. Allocate sites to encourage geographical clusters of specialist employment uses; 3. Allocate all new sites for the range of B classes uses (business, general industry and - warehousing); and 4. Increase town centre office sites. <p>It is noted that these options are not mutually exclusive. From the perspective of Highways England, Option 1 is preferred over other options, or at least Option 1 in combination with other elements. Particularly under a scenario where West Lancashire looks to fulfil an under provision of large-scale logistics in neighbouring authorities, the ability to plan infrastructure requirements will be better facilitated through the precise determination of allocated sites' locations and size. However, it is anticipated that there is a requirement for employment allocations beyond largescale logistics. It may therefore be appropriate to allocate specific strategic sites with smaller generic employment sites available for all use types.</p>	Comments, and preference for Option 1 noted

ID	Representor Comments	Council Response
57	<p>The local plan should provide an appropriate policy context which accommodates the needs of the businesses which already exist in the borough and those which seek to locate there, subject to normal access and other sustainability criteria. The policy should also allow for alternative development of existing employment sites which no longer meet the needs of businesses.</p>	<p>Comments noted. It is agreed that the Plan should take account of the needs of existing employers. Policy needs to appropriately address the issue of non-employment uses mooted for existing employment sites, taking account of national policy. There is little point in allocating land for employment uses if it can go for housing relatively soon after the Plan's adoption, but it may be appropriate in certain cases on some 'older' sites.</p>
61	<p>Option 1 - would enable Skelmersdale to benefit from the opportunities presented by Liverpool 2 and this area has the appropriate links to the motorway network. Option 2 - To be able to capitalise on the benefits of potentially retaining students from edge Hill (and their skills) in West Lancashire if there are start up opportunities available locally.</p>	<p>Comments acknowledged, including references to Liverpool2 and retention of Edge Hill University graduates.</p>
62	<p>Economically, West Lancashire continues to grow, with a steady growth in jobs in particular and this growth is anticipated to continue. We therefore fully support an increase in employment provision in the Borough. It is important that in addition to stimulating housing growth the economic growth is delivered alongside this. However, in addition to meeting economic growth, it is vital that the local workforce has the housing choice to live and work in the Borough. As stated above our client owns a significant amount of land in the Borough with a particular focus around the M58, a sustainable location with easy access to important highways infrastructure, which is considered to have good capacity to accommodate employment growth in the area. It is therefore considered that the land around the Junction 3 could be easily delivered as there is no multiple landowner assimilation to consider. As set out above there is evidence to suggest that the borough could deliver large scale logistics development as part of the wider Liverpool City Region. As such, serious consideration should be given to the allocation of new sites for logistics/employment within the borough, well located next to key infrastructure.</p>	<p>Comments noted. It is agreed that housing and employment growth needs to be integrated, and that development land should have access to infrastructure. Comments on land around M58 Junction 3 noted.</p>
64	<p>It is our Clients' position that there is a need for additional employment land within West Lancashire, and consider that there is an appropriate opportunity for a new employment site at land to the west of Skelmersdale, to the south of the Motorway, which is suitable for logistics. On the basis of this approach, our Clients' would support Option 1. This Option seeks to allocate sites specifically for strategic distribution and warehousing needs, and in particular identify the M58 corridor as an appropriate location. It is however recognised that other specialisms such as start-up businesses for emerging business sectors are appropriate as set out in Option 2.</p>	<p>Comments noted, including support for Option 1, and acknowledgement that support for start-up businesses is appropriate.</p>
67	<p>See attached submissions. We see a mix/hybrid of these options as the preferable way forward with a focus on larger scale/strategic sites at Skelmersdale and the M58 corridor but also additional sites to meet more localised and smaller scale industrial and business requirements across the full range of economic development types as defined by the NPPF. Flexible allocation to accommodate a variety and choice (including but not exclusively the traditional B use classes).</p>	<p>Comments noted, including support for a mix / hybrid of the options, and the need to provide sites both for large and for small businesses across a range of employment types to provide flexibility / choice.</p>
68	<p>West Lancashire, particularly Skelmersdale, needs to attract and create a more highly skilled, more affluent work force with a good work-life balance. Highly skilled businesses are more effective at growing the local economy than large, land hungry warehouse units that provide limited employment opportunities and whose profits go to shareholders outside of West Lancs. Owners of highly skilled businesses are more likely to relocate here if we</p>	<p>Comments noted. It is agreed that it would be good to attract highly skilled workers to the Borough with appropriate employment and housing. There is also considered to be a need for logistics / warehousing, i.e. a range of employment opportunities.</p>

ID	Representor Comments	Council Response
	create aesthetically pleasing housing developments and smaller business units. - -	
69	Option 4 shows the right principle. As long as not to the detriment of other important town centre roles e.g. shopping and social/cultural life, the principle should be to reduce environmental and cost impact by using existing infrastructure and services, notably public transport for workers' access.	Comments noted. It is agreed that locating development in areas easy to access by public transport and where infrastructure already exists is a good thing. However, opportunities to meet employment needs in town centres may be limited in West Lancashire.
72	no comment	-
73	No comment.	-
75	Economic Policy Issue 1: Providing the Right Scale, Mix and Distribution of Employment Land - Option 1 may result in the allocation of large sites for strategic distribution and warehousing uses, most likely in the M58 corridor, however this location may not necessarily be the most accessible for all West Lancashire residents. It is critical that access to employment opportunities is fully considered particularly with regard to access by Skelmersdale residents.	The M58 corridor is chosen as an area of search for logistics for highways reasons, but also because it is close / accessible to Skelmersdale and can benefit local residents who desire such jobs.
77	Keep smaller light industries in the villages.	Comment noted; it is agreed that in general, rural employment types are more likely to be smaller / lighter, although there are some larger employers in rural areas (e.g. agricultural produce packaging). Some smaller businesses are also appropriate in towns.
78	As above 14. In Appley Bridge Skull House Lane offices and light industry appropriate - near M6 but not heavy industry - too much already.	Comments noted.
81	None of the above. A key strategic B1/B8 employment site situated to the south of Tarleton off the A59 is supported and the landowner (Tarleton Estates Limited) are committed to delivering this site, as there has historically been a lack of employment sites in rural/key sustainable villages. This is particularly relevant in this strategic locality, given the loss of the employment element of both the Tarleton Mill and Alty's Site, which contained allocated employment provision, following the grant of consent for housing under the existing Local Plan 2012-2026.	Comments noted, including comments regarding Tarleton Estates Land. It is acknowledged that 'traditional' employment opportunities in Tarleton have decreased over recent years, although other businesses do exist, e.g. at Windgate.
82	Building better business and finance models that stamp out short-termism and the pursuit of profits today with no regard for sustainability. Game-changing innovation should be embraced and nurtured, and should be active and clear about long-term sustainability targets like carbon reduction and the absolute reduction of resource waste. Local business should be supported, rather than just encouraging large enterprises to come to West Lancashire.	Comments noted. It is agreed that local businesses should be supported, as should sustainability, and there should be scope for innovation. Finance models may be beyond the scope of Planning.
85	Continue of current economic policy with industrial development centred on the three main areas of Ormskirk, Burscough and Skelmersdale but also take advantage of rural opportunities that come forward and potential tourism opportunities.	Comments acknowledged, including the role of tourism.
87	Recent experience shows that there has been limited opposition to changes of use between B class uses, within existing industrial areas in Burscough. This would allocate all employment sites for the range of business use without identifying any sites for specialist employment uses. We do not know what businesses will present requiring premises in Burscough and flexibility is required. Specific sites seeking change of use from Business use to Housing should not generally be allowed, or must be included in the local plan, so that total numbers can be quantified and suitable infrastructure planned for in line	Comments noted, including comments on the need for flexibility, the need to plan infrastructure, and the need to locate HGV-heavy uses close to the motorway network where possible.

ID	Representor Comments	Council Response
	<p>with developments.</p> <p>All proposed development must have regard for the poor road network and the increased weight of HGV and regular traffic. Warehousing, and businesses requiring substantial HGV traffic movements are more suited to locations close to the motorway network.</p>	
89	<p>Option 1 is to Allocate sites specifically for strategic distribution and warehousing needs. It is identified that this would primarily be within the area of Skelmersdale. Our Client supports the allocation of sites for strategic distribution and warehousing needs but thinks it would be unwise to focus only on Skelmersdale. Burscough would also provide a suitable location with links to the M6, M58 and the railway network. Restricting these locations to only Skelmersdale would not be positive as this could impact on delivery of development due to the viability of this location. Option 3 seeks to allocate all new sites for the range of B class uses. Our Client supports this approach as this provides businesses with flexibility and allows for market changes during the plan period. This Option is seen to be justified in accordance with the framework as it seeks economic growth.</p>	<p>Comments noted. Access from Burscough to the M58 / M6 is not as good as access from Skelmersdale. Support for Option 3 noted.</p>
90	<p>West Lancashire, particularly Skelmersdale, needs to attract and create a more highly skilled, more affluent work force with a good work-life balance. Highly skilled businesses are more effective at growing the local economy than large, land hungry warehouse units that provide limited employment opportunities and whose profits go to shareholders outside of West Lancs. Owners of highly skilled businesses are more likely to relocate here if we create aesthetically pleasing housing developments and smaller business units.</p>	<p>Comments noted. It is agreed that it would be good to attract highly skilled workers to the Borough with appropriate employment and housing. There is also considered to be a need for logistics / warehousing, i.e. a range of employment opportunities.</p>
95	<p>4.2 The Economic Topic Paper confirms that WLBC expect West Lancashire's economy to continue to gradually grow with steady jobs growth and this growth could increase at a higher rate owing to the significant opportunity to boost the local economy being presented by the anticipated surge in sub-regional demand for logistics facilities emanating from the operation of the Liverpool2 deep water terminal and the aspiration to retain more graduates within the borough.</p> <p>4.3 WLBC proposes a number of options:</p> <ul style="list-style-type: none"> (i) Allocate sites specifically for strategic distribution and warehousing needs (most likely to be in the M58 corridor) (ii) Allocate sites to encourage geographical clusters of specialist employment uses (iii) Allocate all new sites for the range of B classes uses (iv) Increase town centre office sites <p>4.4 It is considered that all of WLBC's identified options (in some form) will be required if the Local Plan is going to be positively prepared and seek to capitalise on economic growth aspirations.</p> <p>4.5 In terms of Ormskirk, it is acknowledged within the Economic Topic Paper that Ormskirk represents an important concentration of employment, in large part a result of the location of a number of major employers. It has, however, been acknowledged within WLBC's evidence base that the current amount of employment land in the settlement is comparatively low for its size, with an expectation that the Local Plan will look to support a proportionate level of employment growth within the settlement to reflect its economic potential in this regard.</p> <p>4.6 The role of Edge Hill University is evidently important as a driver of a range of employment opportunities in Ormskirk and as identified above, likely to grow its role and contribution in the future. Indeed WLBC's TSEP confirms that 'Edge Hill University has enjoyed success and growth over the past decade and is a major employer in the town</p> <p>The Social Policy Options Paper similarly notes that: - "Edge Hill University is a major employer in the Borough having grown significantly over the past two decades, and enjoys a good reputation nationally. Overall, it is considered that the University has a beneficial impact upon West</p>	<p>Comments noted, including qualified support for the 4 options. These options are not mutually exclusive.</p> <p>Comments on the significance of Edge Hill University and of Ormskirk are noted - as quoted, these points are acknowledged in the Options Papers and evidence base.</p>

ID	Representor Comments	Council Response
	<p>Lancashire, making a significant contribution to the local economy through direct employment, the ‘supply chain’ and patronage of local businesses”</p> <p>4.7 The Economic Policy Options Paper highlights the potential to capitalise upon this existing asset through the allocation of sites for clusters of specialist employment uses, as “...sites could be provided for forecast growth in emerging business sectors such as professional and scientific services or for start-up businesses which may be compatible with development scenario 2 (Key Service Centres focus) given the presence of Edge Hill University...”</p> <p>4.8 In addition to supporting employment, it has also been recognised that the University can also contribute towards sustaining and growing the younger working age population of West Lancashire, with the retention of graduates in suitable high quality jobs in the borough identified as a key planning objective for Ormskirk.</p> <p>4.9 Outside of the University the Local Plan and its evidence base includes specific reference to the economic opportunities associated with the anticipated growth in the logistic sector, and to a lesser degree, advanced manufacturing and its supporting sectors. Reference is made to the potential that West Lancashire has to benefit from and support this economic growth along the M58 corridor, with this forming an important consideration in the allocation of future employment land. In terms of capitalising on logistics growth, West Lancashire is geographically well placed with the M58 corridor connecting easily to the M6 motorway in the east and directly into the Liverpool (via the M58, A580 and Dunningbridge Road) and is a corridor which is relatively untapped in terms of its development potential. A positive approach towards accommodating some of the anticipated sub-regional need for logistics space would also bring significant economic benefits to the borough.</p> <p>4.10 Whilst the links between Skelmersdale and the Port of Liverpool are emphasised it is important to recognise that, as set out in WLBC’s evidence Ormskirk also enjoys comparatively strong links to the M58 noting that it can be “...accessed three kilometres south east of the settlement...”. This is also recognised within WLBC’s Economic Policy Options paper which in referencing the potential growth of the M58 Corridor notes that the location of jobs in the area would be most compatible with development scenario 2 (Key Service Centre Focus) as well as scenario 4 (Skelmersdale focus). In the context of the evidence presented in these representations it is apparent that Ormskirk has an important role to play in accommodating a share of additional need / demand generated from additional employment growth and associated housing resulting from this opportunity.</p>	
96	AIUH make no specific comment in these respects.	Noted.
97	St. Modwen make no specific comment in these respects.	Noted.
99	<p>It is our Clients’ position that there is a need for additional employment land within West Lancashire, and consider that there is an appropriate opportunity for a new employment site at land to the west of Skelmersdale, to the south of the Motorway, which is suitable for logistics. On the basis of this approach, our Clients’ would support Option 1. This Option seeks to allocate sites specifically for strategic distribution and warehousing needs, and in particular identify the M58 corridor as an appropriate location. It is however recognised that other specialisms such as start-up businesses for emerging business sectors are appropriate as set out in Option 2.</p>	<p>Comments noted, including support for development of clients' land west of Skelmersdale, and also support for Option 2.</p>
107	<p>A well evidenced combination of the above options should be developed to ensure a wide range of development options whilst ensuring we do not put all of our efforts into one options which may not deliver what is required. Consideration must be given to what will be the future employment needs of society and plan to be best placed to meet them. For example higher level manufacturing, regional and local distribution systems (drones etc). -</p>	<p>Comments noted. It is agreed that it would be wiser not to 'put all our eggs into one basket' employment-wise, and also to consider how employment and employment land needs are changing / may change in the future.</p>

ID Representor Comments**Council Response**

	Working from home with perhaps intermittent access to office facilities.	
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Question 16: What kind of protection do you think the Local Plan should give existing Employment Areas? Why? Is there an alternative option that you think is appropriate that has not been considered?

ID	Representor Comments	Council Response
14	option 1, plan and enforce employment sites and expansion	Comments noted.
18	no comment	-
20	Too complex an issue for us to address.	Noted.
23	Option 1. A case by case approach is most appropriate	Comments noted.
24	Option 1. I think there has been good progress in employment areas within the Ormskirk and Burscough areas.	Comments noted; it is agreed these employment areas are generally doing reasonably well.
26	With reference to my previous comments, it is import to understand how many jobs are being created. I would draw your attention to 2 planning applications for gymnastics clubs allowed in Employment sites in Sandwell (PA ref DC/16/59751) and Birmingham (PA ref 2016/09468/PA). Both clubs are employing and training a number of people. Therefore I agree some protection is required but as I suggest it should depend on employment and training opportunities created.	Comments noted. The approach advocated is effectively Option 3 - allowing some non-B class uses on some employment areas.
28	Option 1	Noted.
30	Option 1	Noted.
31	In order of preference, option 2 then 1	Comments noted.
32	Option one to continue with existing Local Plan approach seems the most sensible option	Comments noted.
39	<p>Responses re :- Option 1 ,2 &3.</p> <p>1. Continue with existing local plan policy including : - Strategic Employment Sites - Other significant employment sites - Other Existing Employment Sites All existing employment areas would be reassessed</p> <p>2. Increased development in rural areas Protect all existing employment areas for business class employment uses prevents change of use to residential from employment.</p> <p>3. A tourism and visitor economy policy The adoption of a strategy to increase non food retail income into the Borough could be modelled on the Cheshire Oaks approach, whereby a designated area for aesthetically pleasing high quality retail units,with good parking, and connecting road infrastructure, might be located in the Borough. This could include a cinema and boutique eating establishments. The advantage of this approach is that the development is located in a designated area, consumers can be offered a great variety of purchasing options in one easily accessible place, and without punitive parking constraints as a disincentive. Warrington New Town was also a model in the 1970s whereby a clear strategy was adopted and an officer was appointed to co-ordinate the project, although the large mass warehouse type of shopping unit in Warrington might perhaps be out of character with West Lancashire's more rural character. Nevertheless these development models are a potential precedent which could be emulated, and perhaps liaison with the officers who were part of these developments might be a way of gathering advice for a future similar strategy.</p>	Comments noted, including support for a large retail development. (These comments are more relevant to Question 19. In general terms, a large out-of-centre retail park is likely to impact negatively upon existing town centres, even if the aim is to claw back expenditure leaked to other districts.)
42	We have no comment at this time.	Noted.
46	Flexibility is important when considering Employment Areas as the needs	Comments acknowledged. It is agreed that

ID	Representor Comments	Council Response
	and types of employment change within the timescale of the Local Plan. There has been Employment areas designated but then subsequently struggled to fulfil their allocated sites with sustainable employment opportunities. So really, Option 1.	needs and types of employment change over time, and that the Plan needs to take account of this.
47	Some employment area types are not suitable in close proximity to housing due to pollution, noise, or heavy industrial traffic. So keep the Walkers Crips type business where it is. But things like Solid Sheds, electrical wholesalers and other businesses which are non-polluting and work 9am-5pm could be sited nearer to housing.	Comments noted - it is agreed that some employment uses can be located close to housing, whereas others need to be on industrial estates.
48	Continue with option1.	Noted.
50	<p>Existing Employment Areas</p> <p>Economic Policy Issue 2 discusses four potential options for existing employment land uses within the Borough. These are summarised as:</p> <ol style="list-style-type: none"> 1. Continue with the existing Local Plan approach; 2. Protect all existing employment areas for business class employment uses; 3. Designate selected employment areas either wholly or in part for non-business uses; and 4. Do not protect employment areas for B1, B2 and B8 uses. <p>Highways England's key guidance document, The Strategic Road Network: Planning for the Future (2015) states that: - "Capacity enhancements and the infrastructure required to deliver strategic growth should be identified at the local plan stage. In this way options for road capacity enhancement or other transport infrastructure to support strategic development sites can be considered long before the planning application stage."</p> <p>Where there is a greater degree of uncertainty over the use-class of a site, it will be more difficult to predict the likely impacts of the site on the local and strategic road networks; Option 4 in particular does not protect any land for employment use, instead allowing market forces to dictate the appropriate mix of uses within existing employment uses.</p> <p>We therefore would prefer that those options promoted facilitate a degree of certainty over the use-type of existing sites, allowing more accurate planning of infrastructure and lessening unforeseen impacts.</p>	Comments noted. It is not always possible to specify the use class for a site; often, employment sites are allocated for B1, B2 and B8 uses.
57	See above	(Noted.)
61	<p>Option 1 - protect employment uses on the most important sites. Allowing other uses, not automatically residential use, but leisure and other services needed in an area should be explored. The process to establish whether an employment site is viable should be more rigorous and more timely. A 'for sale' sign indicating an employment site is up for sale (sometimes for years) should not be sufficient evidence of viability (or not) for employment use. There should be key robust stages set out in the Local Plan that a land owner needs to meet before employment land is deemed unviable for that purpose.</p> <p>2 of the 4 sites identified in the current local plan for employment use are located in Hesketh Bank & Tarleton. One has already been deemed unviable for employment use and has moved to residential use and the other site is highly unlikely to deliver employment use. This is a waste of resources and time.</p>	Comments noted; Option 3 allows for other uses on certain designated employment sites. Employment needs change, as do circumstances relating to individual sites. The allocation of the sites in Tarleton / Hesketh Bank in 2013 was undertaken to the best of officers' knowledge at that juncture, and is not considered a 'waste of resources and time'.
64	For sites in existing employment use, these sites should be continued to be designated for this use.	Comments noted - this is similar to Option 2.
67	see above - a more pragmatic and flexible approach should be considered.	Comments noted.
69	Allocate as part of a holistic plan to focus on Skelmersdale and other existing hubs, so that existing infrastructure is used and work is accessible from where people live	Comments noted; it is agreed that it is prudent to locate development where infrastructure exists and where people can access it easily.
72	Grow the rural and ancillary rural economy.	Comments noted.

ID	Representor Comments	Council Response
73	No comment.	-
78	Encourage young locals for agricultural work	Comments noted.
81	If it can be demonstrated that there is no demand for the employment site and they can come forward for an alternative use, i.e. Housing and such development is sustainable, then this policy should be supported.	Comments noted. This is similar to current national policy in some respects.
82	Key issues must all relate directly to the need to support the projected population - number and profile - in a way that reduces our currently unsustainable impact on the planet and on our local environment.	Comments noted; the Local Plan does indeed seek to support the projected population, both in terms of number and profile - population projections strongly influence housing and employment land requirements.
87	Burscough's industrial areas have seen an increase in non-business uses, such as fitness centres, activity centres, professional services and direct sales of items that have both a business to business, and business to consumer market, such as sheds/windows/tool hire etc. While availability of good quality employment land must be maintained for all industry, the need for out of town locations for non-industry use is recognised. Serious problems exist where we see an increase in members of the public on foot in areas where there are no footpaths and no safe walking routes. Where this is considered proper and adequate provision must be made for pedestrians. This proposal will further increase traffic movements on and to our industrial areas: The capacity of our road network must be considered.	Comments noted. Option 3 acknowledges the increase in non-B Class uses on existing industrial estates, some of these uses related to the employment uses. In general terms, out-of-centre retail is not encouraged, but some forms are most appropriate on industrial estates. Whilst it is not disputed that providing for pedestrians is a good and necessary thing, most goods available for purchase at employment areas are likely to require a vehicle to carry them. The Local Plan will be subject to a transport assessment.
89	<p>Option 1 identifies a continuation of the existing Local Plan policy approach and states: - "This includes three types of existing site comprising: Strategic Employment Sites, Other Significant Employment Sites and Other Existing Employment Sites. B1, B2 and B8 uses as well as A1 retail warehouses on a like for like basis are allowed at Strategic Employment sites with more specialist uses (offices, hotels, D1) supported at selected sites. B1, B2 and B8 uses are permitted at Other Existing Employment Sites. B1, B2 and B8 uses are permitted at other Employment Sites whilst allowing their redevelopment under certain circumstances. All existing employment areas would be reassessed to confirm whether they would still meet criteria for their designation. The approach would assume that the previously describes relaxation in planning rules will not adversely affect the purpose and function of existing employment areas."</p> <p>- Our Client agrees with the protection of employment sites and would recommend that the Council include within their policies that opportunities to extend or enhance these employment areas would be sought and supported.</p> <p>West Lancashire identify the following within Paragraph 2.8: - "...There is a need to ensure that existing employment areas and premises continue to meet a diverse range of business needs and consider if it would be appropriate for them to allow alternative commercial needs beyond the traditional employment uses of business, general industry and warehousing..."</p> <p>- Our Client supports the statement and intention within paragraph 2.8 and asserts that seeking opportunities to extend and enhance with employment areas would assist the Council in achieving this. Strengthening existing employment locations and providing opportunities for companies to grow will retain these uses within the Borough. -</p>	Comments noted, including support for protection and enhancement (and expansion) of existing employment areas, including by allowing related commercial but non-B class uses.
96	AIUH make no specific comment in these respects.	Noted.
97	St. Modwen make no specific comment in these respects.	Noted.
99	For sites in existing employment use, these sites should be continued to be designated for this use.	Comments noted.

Question 17: What do you think about the policy options above for supporting the rural economy? Is there an alternative option that you think is appropriate that has not been considered? If so, what is it?

ID	Representor Comments	Council Response
1	Option 2 local people want to live were they were brought up - they can't afford to because of the lack of property in there area.	Comments noted; these comments are relevant to the Social Options paper also.
9	Option 3	Noted.
12	Option 3 eg camping/glamping.	Comments noted.
14	option 3, tourism and visitors are a growth industry, and can be integrated into our economy without being even noticed by most people	Comments noted.
18	no comment	-
20	Option 1: Continue with existing Local Plan Policy approach.	Comments noted.
21	Keep the pumps working and give more support to the farmers and producers. You have not given them enough consideration.	Comments noted. 'Keeping the pumps working' is outside the powers of the Local Plan, but the continued drainage of the Alt Crossens area is supported.
23	Option 3. Encouraging tourism and visitor economy by maintaining the character and countryside of West Lancashire will benefit everyone.	Comments noted; it is agreed that tourism should be encouraged, but not at the expense of the countryside and character that attracts people in the first place.
24	Option 1	Noted.
26	I think an overarching policy could be open to interpretation where as more specific policies may be better	Comments noted; this principle applies more generally, not just to policies for the rural economy!
28	Option 1	Noted.
30	Option 1 combined with Option 3 The Tawd Valley Park and Cloughs of Skelmersdale have much potential to be linked with Beacon Country Park and surrounding footpaths in Green Belt countryside as a destination for walkers/hikers.	Comments noted. It is agreed that Beacon Country Park is a valuable asset, that the Tawd Valley Park has significant potential, and that linking 'green infrastructure' can provide multiple benefits.
31	With option 1, EC3 has not been well supported in the Northern Parishes where a mixed use development was almost lost to a massive housing development without any real effort to deliver business use. Key Local Plan policies like Coastal Zone were side lined and the recommendations of the of the Inspector to the Local Plan were down played. Option 3 seems appropriate for rural communities. In regard to the Northern Parishes, any increased road use (hesketh Lane) is unlikely to coincide with peak commuter travel.	Comments regarding Options 1 and 3 noted. Development Plan policies are taken as the starting point when dealing with planning applications, but material considerations sometimes indicate that a variation from the policies may be appropriate.
32	Option 1 the existing Local plan option makes sense as it seeks to protect agricultural and rural land whilst providing employment at appropriate levels. Option 2 increased development would surely threaten the very nature of rural communities	Comments noted. Any rural development focus (if chosen) would need to ensure that development levels did not threaten the nature of rural communities or the general character of the rural area.
39	Responses... a multi faceted approach... 1. Protect the best agricultural land, protect rural; employment and re-use existing buildings to allow rural business growth, encourage renewable energy combine rural sites for mixed use rural development 2. Increase development in rural areas packing and distribution centres, larger farm shops 3. Tourism and visitors economic policy concentrating on larger scale	Comments on Options 1 and 2 noted. Option 3 was not intended to imply a large scale retail type development. (See also the Council's response to Q16 above.)

ID	Representor Comments	Council Response
	<p>tourist sites such as Martin Mere and caravan parks or holiday lodges, including a Cheshire Oaks style top end retail unit development in a strategically located site as described in our response to the previous question.</p>	
42	<p>Option 3) A tourism and visitor economy policy reads: "This could consider site specific criteria for the expansion of larger scale tourism sites such as Martin Mere or new facilities. In order to grow the rural economy this approach could also identify circumstances whereby the development and / or expansion of caravan parks or holiday lodges may be suitable. Careful consideration would need to be given to compatibility with Green Belt policy." However, Green Belt would not be the only significant policy with which it would need to be compatible. It would also need to comply with policies on Ecological Networks (including components recognised as nationally and internationally important sites as well as Local Wildlife Sites) and policies on Green Infrastructure and its related ecosystem services. Such an approach would potentially be more sustainable over a medium to longer term than the current unsustainable agriculture drainage and ploughing practice that delivers grade one and two agricultural land at the cost of rapid soil loss through the oxidation of peat with resultant substantial release of millennia of stored carbon, windblow of sand and silt, and eutrophication and degradation of watercourses. See: http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environmental-audit-committee/soil-health/written/26828.html for our locally specific expansion on that; though the recommendations in the report of the House of Commons' Environmental Audit Select Committee on Soil Health have broad local relevance. The stalled initiative on a Ribble Coast & Wetlands Regional Park (http://www.ribblecoastandwetlands.com) went some way to consider the local natural environment's contribution to a tourism and visitor economy, albeit in a somewhat wider geographical context; but the local government and NGO capacity and tourism and visitor economy in play at the time was unable to deliver. I'm unsure if local circumstances have changed sufficiently in the interim to revisit this in some form? I am well outside my own core expertise here, in terms of the tourism economy; but WWT Martin Mere and, our own experiences at our Mere Sands Wood nature reserve & visitor centre in West Lancashire and, on a larger scale at Brockholes in Preston City, may offer some guidance as may the RSPB's at Leighton Moss in Lancaster City District and the National Trust's at Formby in Sefton Borough.</p>	<p>Comments acknowledged. It is agreed that a tourism / visitor economy approach needs to comply not just with Green Belt policy, but also with policies to protect the natural environment and designated nature sites. Even leaving aside the nature conservation argument, it is in people's economic interest to preserve the assets and character of the countryside as this is what draws many tourists and visitors in the first place. And as stated, several of the Borough's attractions are strongly linked to the natural environment, e.g. Martin Mere. The effects of intensive agricultural practice (including turf growing) are acknowledged; much of this is beyond the control of Planning.</p>
46	<p>Option 3. has the greatest potential for economic opportunities throughout the borough. Keying West Lancashire into the wider 'Marketing Lancashire' framework is vital. We need to exploit and develop the unique potential of West Lancashire in terms of its positioning within wider Lancashire in particular in terms of its Ramsar sites and wildlife areas. In particular the water borne navigational potential within the borough uniquely places West Lancs at an advantage by being at the centre of the link of the canal systems throughout the North West and also as the gateway to the open sea via the River Ribble. Very few navigable alternative options are available in as close a proximity to significant numbers of the population as West Lancs, it being closer to the open coastal reaches of the Irish Sea than Preston Docks and far more easily navigable than Southport.</p>	<p>Comments on Option 3 noted. It is agreed that the assets and position of the Borough provide great potential and should be capitalised upon if the tourism / visitor economy is to flourish. It is agreed that the canal / navigable river network is an asset in the Borough, providing important links further north.</p>
47	<p>Basically, Skem town centre is rubbish. And the proposed new retail and leisure developments won't help much as it is just creating a clone town of chains with nothing unique about it, and therefore nothing to attract tourists. How about some unique artisan businesses (food and crafts) on a proper high street, in the fresh air, not in a mall, anywhere in West Lancs.</p>	<p>Comments noted; work is ongoing to regenerate Skelmersdale Town Centre. Ormskirk has some 'artisan businesses'.</p>

ID	Representor Comments	Council Response
48	All 3 options should be adopted with rural development restricted to small light industry on suburban and derelict farm building sites.	Comments noted; it is agreed that light industry would be appropriate on some derelict farm sites. There is also a role in West Lancashire for larger agricultural produce packaging facilities.
57	The existing approach is unduly restrictive, due to an overly rigid interpretation of Green Belt policy.	Comments noted.
61	<p>Option 1: The best and most versatile agricultural land should be protected for the continuity of the food supply for the country. Once lost this can not be re-gained. Tourism of an appropriate scale and renewable energy projects should be supported.</p> <p>As previously suggested, the criteria for retaining employment use should be more rigorous within the Local Plan in an attempt to keep this use and prevent it going for residential use. All other uses, such as leisure, should be fully explored before simply building more houses , which often is the easy option.</p>	Comments noted. It is agreed that the best and most versatile agricultural land is an asset of wider importance than this Borough, and should be protected where possible. In terms of non-employment uses on employment sites, any Local Plan policy must be compliant with national policy, which allows non-employment uses in certain cases.
64	Paragraph 28 of the NPPF supports economic development in rural areas, and our Clients are supportive of growth and development within these locations, where appropriate.	Comments noted.
69	Farming especially arable should be a priority given the advantages of the soil and conditions in West Lancs. A visitor economy that is carbon neutral and takes advantage primarily of existing assets would be worthwhile	Comments acknowledged. It is agreed that arable farming is an important 'element' of West Lancashire borough. It is agreed that a visitor economy that recognises the Borough's natural assets should be supported.
72	Option 2 definitely - increase development in rural areas sensitively. Option 1 isn't working.	Comments noted, although it is not agreed that Option 1 'isn't working'.
73	No comment.	-
75	<p>Economic Policy Issue 3: Spreading Economic Opportunities by Supporting the Rural Economy</p> <p>We welcome Option 2 of allowing for proportionate increases in development in rural areas through a more permissive approach, subject to detailed transport considerations. This option has the potential to deliver positive effects in terms of health and social inclusion benefits and rural employment opportunities.</p>	Comments noted; it is agreed that accessibility, especially by public transport, is an issue for rural employment.
78	Supporting 'farm' type enterprises and small work units encouraging the young at suitable affordable rates.	Comments noted. It is agreed that suitable employment opportunities should be provided for local young people.
81	Support Option 2 - A key strategic B1/B8 employment site situated to the south of Tarleton off the A59 is supported and the landowner (Tarleton Estates Limited) are committed to delivering this site, as there has historically been a lack of employment sites in rural/key sustainable villages. This is particularly relevant in this strategic locality, given the loss of the employment element of both the Tarleton Mill and Alty's Site, which contained allocated employment provision, following the grant of consent for housing under the existing Local Plan 2012-2026.	Comments noted. See response to Q15.
82	A sustainable and fair economy means measuring and starting to reduce our usage of the world's carbon, land, water and raw materials, and putting a much higher priority on non-GDP measures of national success and prosperity. It also means using all levers Government has to inspire dynamic and disruptive innovation to deliver the technology and new business models we urgently need.	Comments acknowledged, although much of what is recommended is beyond the scope of the Local Plan.
87	Burscough Parish Council supports option 1 which is to continue with the existing Local Plan Policy. However, a more substantive policy towards	Comments on Option 1 and support for a more substantive tourism and visitor

ID	Representor Comments	Council Response
	<p>supporting the tourism and visitor economy should be incorporated into this policy and more encouragement should be given to renewable energy projects. Please note that Burscough Renewable Energy CIC commissioned UCLAN to prepare a very excellent report into wind power in Burscough and this is available on the Parish Council's website. It is of use to any business considering wind power in Burscough and covers most industrial areas. We note that there was little objection to the recent application for a solar farm at Pippin Street so long as the site was properly screened and remained under some form of agriculture (such as grazing land). It is important that, within the local plan, various forms of renewable energy are dealt with separately, as the impact on local residents can be very different.</p>	<p>economy policy noted. Renewable energy is supported in principle; the Council intends to commission a study into renewable energy and how it can be best provided in West Lancashire. It is agreed that different types of renewable energy require different consideration.</p>
96	<p>The rural area can include some areas which are highly accessible to the regional road network. To that extent, these represent positive opportunities for high growth uses such as distribution. Opportunities to accommodate distribution uses should be encouraged as part of a broad-based initiative to improve employment land take-up. Housing development in and adjacent to Up Holland will inevitably provide a boost to services and retailing within Up Holland Local Centre which will support the local economy.</p>	<p>Comments noted; whilst access to the road network is an important consideration for distribution uses, there are other factors that need to be taken into account. Comments on housing noted.</p>
97	<p>St. Modwen make no specific comment in these respects.</p>	<p>Noted.</p>
99	<p>Paragraph 28 of the NPPF supports economic development in rural areas, and our Clients are supportive of growth and development within these locations, where appropriate.</p>	<p>Comments noted.</p>

Question 18: Do you have any comments in relation to the Network and Hierarchy of Centres in the Local Plan?

ID	Representor Comments	Council Response
14	no	-
17	We agree that Skelmersdale Town Centre should be identified as the principal town in the hierarchy of Centres.	Comments noted.
18	no comment	-
20	No comments.	-
23	No	-
24	Option 3	Noted.
26	No comments	Noted.
28	Hierarchy fine as long as Up Holland is considered to be a village centre and not part of Skelmersdale.	Comments noted.
30	I support the existing heirarchy. I welcome the reduction in land area allocated to Skelmersdale Town centre shown in Appendix 2. Is this a proposal or has the wrong plan been included by mistake?	Comments noted. The boundary shown for Skelmersdale Town Centre in Appendix 2 is the same as the boundary for the Town Centre marked on the 2012 WLLP policies map. (The wider boundary marked on the 2012 WLLP policies map was for the Skelmersdale Town Centre Strategic Development Site.) This is not an error.
31	no comments	Noted.
39	Response A: These should be reviewed to include Halsall and other village centres.	Comments noted. Whilst Halsall has a number of facilities (e.g. filling station, pharmacy, pubs), these are not together in one place. As such, there is not considered to be a village centre as such at Halsall.
42	We have no comment at this time.	Noted.
46	Hierarchy of centres should be flexible enough to take into account that some areas, Skelmersdale for example, need significant increases of activities associated with town centres. This could impact the amount and type of activities in the other town and village centres.	Comments noted. If town / village centres change to the extent that the hierarchy needs amending, this can be done in future through a review of the Plan. (Plans are to be reviewed every 5 years.)
48	Review the Local Centre heirarchy. However, developing new housing in the smaller centres increases transport pressure to service the increased rural population. Servicing any increase in rural population with additional shops etc. needs to be considered.	Comments noted; the respondent has not indicated how the local centre hierarchy should be reviewed. It is agreed that provision of additional services in rural centres would be beneficial and should be supported by policy; rural services tend to be lost through lack of patronage.
64	Our Clients are supportive of the continued growth and development of the identified centres within the settlement hierarchy.	Comments noted.
72	the existing hierarchical approach is failing because the small village centres are failing so review the hierarchy accordingly.	It is acknowledged that small village centres have struggled, due in part to factors beyond the control of the Local Plan. However, their continued designation means that provision of future services there is

ID	Representor Comments	Council Response
		supported, even if the services are not operational at present.
73	No comment.	-
75	<p>Economic Policy Issue 4: Network and Hierarchy of Centres</p> <p>We welcome the option of a review of the existing hierarchy with regard to increasing choice and accessibility to retail, employment, community services and facilities within the centres. Any changes to the hierarchy should take account of impacts on sustainability with particular consideration given to accessibility for residents from deprived areas, social and rural isolation, and detailed transport considerations.</p>	Comments noted.
81	<p>A key strategic B1/B8 employment site situated to the south of Tarleton off the A59 is supported and the landowner (Tarleton Estates Limited) are committed to delivering this site, as there has historically been a lack of employment sites in rural/key sustainable villages.</p> <p>This is particularly relevant in this strategic locality, given the loss of the employment element of both the Tarleton Mill and Alty's Site, which contained allocated employment provision, following the grant of consent for housing under the existing Local Plan 2012-2026.</p>	Comments noted. See response to Q15.
82	No	Noted.
87	<p>In the present local plan, the regional town is Skelmersdale and Ormskirk and Burscough are stated as equal in both being key service centres. In this Issues and Options Paper, a different scenario of three equal key service centres or town centres is proposed. The position of a settlement in the hierarchy may be intended to inform decisions about new developments such as housing. In this case the hierarchy is not defined by population, nor can it be defined by transport and drainage infrastructure – we assume it is defined by services available within each settlement. Burscough Parish Council would like to repeat its request for a discussion about this and other aspects of the Issues and Options papers before further decisions are made. In so much as the evidence base is not clear on the rationale for this classification, much more discussion is needed regarding the designation and the implications relating to this point.</p>	Comments noted. It is confirmed that the town / village / local centres hierarchy is defined by services available within each centre (and also the wider settlement). In terms of a discussion, it is recommended that Burscough Parish Council contact WLBC.
96	AIUH make no specific comment in these respects.	Noted.
97	St. Modwen make no specific comment in these respects.	Noted.
99	Our Clients are supportive of the continued growth and development of the identified centres within the settlement hierarchy.	Comments noted.

Question 19: Do any of the above options for Ensuring Healthy Town, Village and Local Centres get your support? If so, why? Is there an alternative option that you think is appropriate that has not been considered? If so, what is it?

ID	Representor Comments	Council Response
1	Option 1 as there is to much green belt in west Lancashire - we have the most green belt in England.the boundaries - should be moved to allow people to build were born	Comments noted.
2	Option 1 boundaries should be moved to allow local people to live in there area and be able to afford it	Comments noted.
14	I don't have any comment here	Noted.
17	<p>Option 1</p> <p>We have been instructed by The Skelmersdale Partnership who own the Concourse Centre to submit representations in respect of the emerging draft West Lancashire Local Plan Review Issues & Options Consultation. Our clients have owned the Concourse Centre since March 1997. It was constructed by the Commission for New Towns in the 1960s and is built over 3 floors with the main trading floor (two thirds of the retail space) on the first floor. We attach a site location plan and floor plans of the Centre. The Centre was originally designed for pedestrians and vehicles to be kept separate and therefore integration between car parking and the Centre is difficult. Access to the main trading floor is via a number of pedestrian bridges from the surrounding areas. In the 1980s the Centre was subdivided to include a 3 level multi storey car park which does not link directly into the trading floors of the Concourse at all levels. As a result, the distance between the car park and the shop floor is much larger than modern retail shopping centres. In order to traverse the centre it is necessary to travel between different levels by ramps, escalators, stairs or lifts. This makes trolley shopping particularly difficult. Not only does this negatively affect shoppers but it also results in a lower spend per trip as people tend to make smaller basket sales. As a result, the Concourse is particularly vulnerable to new shopping development either within the Town Centre or within its catchment area.</p> <p>The internal arrangement of the Centre is extremely tired. This is an inevitable consequence of the age of the Centre. Furthermore as can be seen from the submitted floor plans, a number of the large retailers occupy floorspace that is irregularly shaped, some of which is compromised by supporting pillars. This format is not ideal for some large space retailers who prefer a more regular layout which allows them to optimise and customise their store design.</p> <p>The Centre has struggled in recent years, there are currently a number of long term vacant units at the Centre. Including the second floor which is completely vacant other than some storage and represents about 10% of the overall floorspace. The Centre is currently 35% vacant. This level of vacant space is difficult but manageable. However, the current trading position of the Centre is fragile and it is vulnerable from other retail development in the town centre and elsewhere. For example, the owners remain extremely concerned about the impact of the St Modwen development on the Concourse Centre. They have held a number of meetings with the Council to express their concerns and would prefer to see the site developed for housing.</p> <p>For the reasons outlined above, the Concourse Centre is 'protected' in the Council's current Local Plan. In particular Policy SP2 of the Local Plan states that any new retail development in Skelmersdale Town Centre: "should not harm the vitality of the Concourse Centre and must provide sufficient linkage to the Concourse."</p> <p>The continuation of this policy protection is specifically supported. Furthermore, the retention and regeneration of the Concourse Centre is</p>	<p>It is acknowledged that the Concourse Centre has formed the key part of Skelmersdale Town Centre's retail offer for decades, and that the Centre has lately been struggling for a variety of reasons. The request to continue to protect the Concourse Centre by means of planning policy is acknowledged; this makes sense.</p> <p>In terms of the St Modwen development, this has received planning permission, subject to conditions (including preventing the occupation of units in the proposed scheme by occupiers of the Concourse) and has also survived a legal challenge. As such, the scheme cannot be 'deleted'.</p> <p>Retail studies have shown capacity (and need) for extra retail and leisure floorspace in Skelmersdale Town Centre. Whilst additional housing in and around the Town Centre is supported, it is not considered that this should replace or substitute the St Modwen scheme.</p>

ID	Representor Comments	Council Response
	<p>supported by a large number of residents and retailers. We attach a number of letters in support of the Concourse Centre.</p> <p>Turning to Skelmersdale Town Centre, the last retail study dated December 2011 concluded that the town had progressively lost ground in the national retail rankings with the pace of decline accelerating in recent years. A number of High Street retailers had all left the town e.g. Dunnes and had not been replaced.</p> <p>Other deficiencies include the fact that most comparison retail outlets in the town operate at the lower end of the retail spectrum; the very weak food and drink offer with no high quality restaurants, coffee shops or family eating places, only some public houses and no cinema or other leisure facilities. Furthermore, there is considerable leakage of comparison goods, expenditure leaking to destinations beyond the Skelmersdale town catchment area.</p> <p>In view of the above, the Town Centre is exceptionally weak for a town with a population of some 40,000 people and that it fails to function effectively as a town centre. We do not believe that the St Modwen scheme will do anything to correct this decline. Whilst it may offer the opportunity to provide a modern retail development with free car parking, all that it will do is to further assist with the decline of the Concourse Centre by eventually attracting all of the tenants from the Concourse Centre to the St Modwen development. Accordingly we do not believe that there will be any net benefits to the Town Centre.</p> <p>Recommendation</p> <p>So we believe that the Local Plan review is correct in continuing to identify the regeneration of Skelmersdale town centre as an important objective. However, we believe that the Concourse Centre must continue to be protected as per the existing adopted Local Plan i.e. Policy SP2. The reason being that the Centre is now even more fragile than it was during the preparation of the adopted Local Plan and so it is important that specific measures are put in place to ensure that its regeneration takes place. In doing so we would specifically request that the St Modwen scheme is deleted from the Town Centre and that retail and leisure uses are not considered appropriate for the site rather it be identified for residential development.</p>	
18	no comment	-
20	<p>Option 3: Review what we consider to be appropriate uses in town centres. Ormskirk town centre has lost a number of retail stores which seem to have been replaced by cafes, bars or charity shops. Surely there must be a 'saturation point' for such businesses to be granted permission to set up and trade.</p>	<p>Comments noted. Whilst charity shops may not be the preferred use for Ormskirk Town Centre retail units, these are considered better than empty units. Whether a 'saturation point' is reached is determined by the market, rather than by local planning policy which is in any eveny constrained by national policy.</p>
24	<p>I think the shopping areas in the Borough are central and encourage residents to visit but we need to keep reviewing what is there and if they meet the needs of the local population. I think therefore, that the need to review the boundaries is not necessary but we need to make sure the uses of the town centres are fit for purpose. Option 3</p>	<p>Comments noted and acknowledged; retail patterns are changing and town centres need to change as well.</p>
26	There is merit each of the options listed.	Comments noted.
28	Option 3 as retail and service demands are changing.	Comments noted.
30	Option1 combined with Option 3	Comments noted.
31	no comments	Noted.
32	All three options get my support, if town and village centres are to remain supported and thriving then ongoing reviews are necessary.	Comments noted.
39	Responses..a combined approach	Comments noted.

ID	Representor Comments	Council Response
	<p>Re Option 2 Allocate site(s) for town centre uses at Ormskirk. This approach would be in addition to site allocation at Skelmersdale town centre and would vary from recommendations in the West Lancashire Retail Study. Ormskirk town centre is currently performing relatively well but physical constraints exist to finding development sites as a result of the historic core and one way system; however, it needs to evolve and reinforce the commercial offer in order to remain competitive with other shopping and leisure destinations. The redevelopment potential of existing or likely future underused areas within the town centre would be investigated. It could also justify the development of an area based policy / strategy specific to the town centre.</p> <p>Response A - Renew primary shopping area boundaries in the Adopted Local Plan. Use local evidence to review boundaries of Ormskirk and Burscough and decide if there is a need to define a shopping area for Skelmersdale.</p> <p>Re Option 3 Allocate a non-town centre site for a retail warehouse park. This would be a radical approach, again varying from recommendations in the West Lancashire Retail Study and would seek to address the lack of a quality retail warehouse park in the Borough. It would look to reduce the loss of residents' non-food spending from the Borough by allocating an accessible site for a non-food retail warehouse park outside existing town centres, therefore acknowledging that town centre sites were unavailable and / or unsuitable. The most likely location would be either Ormskirk or Skelmersdale. However, this approach would not be without risk in terms of developing a potentially competing attraction with existing town centres.</p> <p>Response B ..This approach would be compatible with our suggestion of a Cheshire Oaks/Warrington Gemini Retail Park type model, as indicated above, and could be combined with the need to provide a site suitable for the retail needs in the North of the Borough</p>	<p>Re. Response A: it is agreed that Ormskirk is performing reasonably well given the recent and ongoing economic difficulties, but that the town needs to 'evolve'. The potential for a strategy / policy specific to Ormskirk can be investigated.</p> <p>Re. Response B: As noted in the response to Q15 and Q16, and as stated by the Representor, a large out-of-centre retail park, even if it was successful in 'clawing back' existing expenditure leakage from the Borough, would be likely to have a significant negative impact on existing town centres, adding to their current difficulties.</p>
42	We have no comment at this time.	Noted.
46	Greater consideration should be given as to the changing needs of town and village centres during this recent period of changing retail patterns and shopping/leisure habits, with enough policy flexibility to allow for fluctuations within communities.	Comments noted and agreed; these changes are indeed being taken into account, not just in planning policy.
48	All 3 options need reviewing. In relation to Ormskirk Centre, revitalisation is important as the town centre has declined markedly in the last 5 years. Parking costs (compared to free parking in trading estates), rate and rent prices should reflect the competition and overall dominance of the large retailers that makes many town centre sites uneconomic for smaller retailers. The mix of shops needs careful consideration, for in Ormskirk the number of charity and coffee shops has increased in relation to other food and retail units.	Comments noted; the past few years have been difficult for town centres in general. It is considered Ormskirk has been reasonably resilient over this period. Parking charges have recently been reviewed. Whilst several A1 retail units have been replaced by bars / cafes, etc. and whilst there are several charity shops, this is considered preferable to empty units. Under national policy / law, planning can only control the mix of uses to a limited extent.
61	I support prioritising Option 2 & option 3. - Option 2 because these centres are the biggest and will therefore have a bigger potential impact on healthier living for a wider population. The review should initially concentrate on areas of concern for example high childhood obesity. - Option 3 because where planning policy permits it should be used effectively to encourage healthy lifestyles.	Comments noted. Obesity and healthy lifestyles are important considerations, not just in Planning, and it is acknowledged the Local Plan should seek to be a positive influence in this respect. However, the word 'healthy' under this policy area is used in a more economics sense, i.e. vitality and viability of town / village centres.
64	Our Clients are supportive of the continued improvements and enhancements to the Town, Village and Local centres, and would support the review of the defined boundaries. They do not however support the retention of the Council's minimum percentage threshold for Use Class A1. The nature of the high street is changing, and other uses should be encouraged not precluded from the high street.	Comments noted. The threshold percentage for A1 uses will be looked at; it is agreed that other uses can also be appropriate in town centres.

ID	Representor Comments	Council Response
67	<p>Option 3 is vital.</p> <p>The role and nature of all centres (town, district and local) has changed fundamentally due to much changed shopping patterns. Centres need to adapt and be permitted to provide a wider range of complementary town centre uses. Beyond vital primary shopping frontages mixed and divers town centre should be encouraged and supported.</p>	<p>Comments noted and agreed - adaptability in an ever-changing retail / town centre context is vital.</p>
69	<p>We should promote town centres as longstanding transport and social hubs, working out how best to do this is the priority.</p>	<p>Comments noted and agreed.</p>
72	<p>its too limited - you need to look at social infrastructure such as schools, churches, parish halls - they need 'walk up' population to support them. That means growing settlements such as Wrightington Bar and giving parents and children the opportunity of walking half a mile or a mile to school rather than arriving in SUVs and breeding a nation of fatties.</p>	<p>it is agreed that town centres do not comprise only retail, etc. uses, but that social infrastructure and population within walking (and cycling) distance are also important considerations. Transport to school comments noted; this is a wider health issue.</p>
73	<p>No comment.</p>	<p>-</p>
75	<p>Economic Policy Issue 5: Ensuring Healthy Town, Village and Local Centres – Appropriate Uses</p> <p>The options for this policy include to review the policy approach to determining appropriate uses in town centres. This policy option could be used as part of a drive to promote healthier lifestyles in West Lancashire by limiting the amount of, and convenient access to, inappropriate uses. In particular, the policy option could be used as part of a drive to tackle health indicators associated with obesity and alcohol consumption.</p> <p>The Sustainability Appraisal states that: - "Option 3 offers the Council more opportunity to influence the types and balance of uses within Town, Village and Local Centres and is likely to be the most sustainable option. This could include a restriction on the number of fast food outlets or bars within a certain area. This could have a significant positive effect upon the social aspects of sustainability in terms of encouraging healthy lifestyles for those living in these centres, and perhaps lessening the incidences of anti-social behaviour linked to the consumption of alcohol. However there may be a slight negative impact upon economic sustainability since there is a potential risk that this may result in empty units if there are no alternative competing uses to occupy them."</p> <p>It is recommended that consideration should be given to the development and inclusion of policies that contribute to healthy town centres to address specific health inequalities. This approach could also be extended to local and district centres. An example of this would be the inclusion of policies that look to limit the percentage of building uses allowed in the town centres, and local and district centres, for hot food takeaways, drinking establishments and even tanning salons, in order to encourage healthier lifestyles. This would reflect the commitment outlined in the Lancashire County Council Local Government Declaration on Healthy Weight to 'Consider supplementary guidance for hot food takeaways, specifically in areas around schools, parks and where access to healthier alternatives are limited'</p>	<p>Comments noted; it is agreed that impacts on health, and ways to improve health, should be at the forefront of thinking when developing policies. Health determinants are wide-ranging and complex, and a take-away policy on its own will not address the problem, but it could be considered.</p>
78	<p>Encourage public transport - keeping town centres clean and bright to encourage local business and keep alive.</p>	<p>Comments noted and agreed.</p>
81	<p>Support through planning policy should be maintained for town and village centres, that enables them to continue to be viable. This could be through allowance for retail units change of use, to cafes, bars and restaurants, and the ability to construct housing within large village centre boundaries.</p>	<p>Comments noted; these largely reflect practice in West Lancashire over recent years, and emerging national policy.</p>
82	<p>Local businesses can enrich local people, but most of the businesses in our town centres seem to be multinational companies that just provide low paid work and take money out of the area, giving support to independent local businesses can make a difference.</p>	<p>Comments noted; this is a wider issue applying nationwide. It is considered Ormskirk has a reasonably good proportion of independent local businesses; measures</p>

ID	Representor Comments	Council Response
		outside of planning policy (e.g. Town Centre Management Group) support such businesses.
87	The primary shopping area of Burscough should be reviewed in line with the emerging Neighbourhood Plan. Any change of use should not allowed without planning permission, and that an increase in the minimum % for shop (class A1) uses at ground floor level within primary shopping areas should be applied.	Comments noted; the Primary Shopping Area boundary can be considered in the light of the Neighbourhood Plan. Policies on change of use must be consistent with national policy.
96	Housing development in and adjacent to Up Holland will inevitably provide a boost to services and retailing within Up Holland Local Centre which will support the local economy. This should be afforded positive weight. AIUH makes no other specific comment in these respects.	Comments noted.
97	<p>Skelmersdale has a defined town centre which is extensive, but has no identified primary shopping area (PSA). It is clear from review of the consultation stages of the adopted Local Plan that consideration was had in terms of identifying a PSA for Skelmersdale but rejected on the basis that it would need to ultimately include reference to the town centre extension scheme.</p> <p>The subsequent planning activity has secured an approval for the town centre extension, but its implementation has been prejudiced as a consequence of the interpretation of a standing policy which affords weight to the protection of the existing and underperforming Concourse and does not expressly afford appropriate weight to the planning benefits to be accrued as a result of the town centre extension.</p> <p>We conclude that the identification of a PSA for Skelmersdale which encompasses the Concourse and the approved town centre extension scheme is the appropriate policy approach which will catalyse delivery of the long-awaited scheme.</p>	Comments noted; the extent of any Primary Shopping Area in Skelmersdale can be determined having regard to the most up-to-date knowledge of approved / proposed redevelopment of the Town Centre.
99	Our Clients are supportive of the continued improvements and enhancements to the Town, Village and Local centres, and would support the review of the defined boundaries. They do not however support the retention of the Council's minimum percentage threshold for Use Class A1. The nature of the high street is changing, and other uses should be encouraged not precluded from the high street.	Comments noted. The threshold percentage for A1 uses will be looked at; it is agreed that other uses can also be appropriate in town centres.

Question 20: Do we need to allocate Sites for Town Centre Uses within West Lancashire in the Local Plan? If so, which option do you think is the most appropriate and why? Is there an alternative option that you think is appropriate that has not been considered? If so, what?

ID	Representor Comments	Council Response
1	Option 1 as this is an employment area	Comments noted.
9	Option 1	Noted.
12	3 and 4 - Make use of derelict scrubland ie brown belt rather than green	Comments noted.
14	continue current approach	Comments noted.
18	no comment	-
20	Option 1: Continue our current approach - make Skelmersdale town centre the priority for investment . It should be the priority for investment, attracting new business investments and opportunities and the accompanying development of new housing.	Comments noted.
21	No	Comment noted.
23	Option 1 is appropriate.	Comments noted.
24	Definitely Option 1 because Skelmersdale is most in need of investment.	Comments noted.
26	No comments	-
28	No further retail sites required in the Borough as there is already an over-supply particular considering proximity to major city Centres and the Trafford Centre. None of the above options are suitable.	Comments noted; there is not considered to be an 'over-supply' of retail floorspace in West Lancashire. Facilities such as the Trafford Centre and city centres are some distance from West Lancashire.
30	Option 1 but include the land opposite ASDA to the south of Ingram, so that the misleadingly named "High Street" can be redesigned to include retail warehouses for items not sold in the Concourse, eg Garden Centre, DIY /Builders Merchant, Car Maintenance and spares. To adopt option 3 will detract from the possibility of ever developing the Skem Town centre. The redesign should take advantage of the views of Tawd Valley Park and include leisure activities. It should complement rather than compete with the Concourse and provide parking for those wishing to use the park, particularly the disabled, To turn south at the bottom of Ingram to be faced with a service yard is a most unattractive option. Please see the comments, previously submitted at the application stage on behalf of CPRE, on the currently approved St Modwen Scheme.Plan. CPRE wants strong, vibrant town centres to avoid the need for green field development in the countryside.	Comments noted. The detailed comments, repeated from CPRE's comments on the St Modwen planning application for Skelmersdale Town Centre, are noted, but these proposals now have consent. It is agreed that proposals for the Town Centre should result in an attractive scheme for pedestrians and that natural assets of the area (e.g. the Tawd valley) should be acknowledged.
31	Out of town retail parks are not a sustainable solution. It would be good to see an increase in the number of local shops in the Northern Parishes but I believe major effort should go into improving the shopping in Skelmersdale.	Comments noted.
32	Option 1 to continue with the current approach seems to make the most sense, however Option 2 allocating sites in Ormskirk would also make sense and hopefully prevent Ormskirk becoming even more run down than it currently is. The borough does not need more out of town retail parks we need to cherish our town centres and help them survive and thrive, thus limiting the traffic impact on our overburdened road infrastructure	Comments noted. It is agreed that in general terms, policy should support town centres before out-of-centre development, and that traffic generation is a factor that needs to be considered.
39	Responses..a combined approach - Re Option 2 Allocate site(s) for town centre uses at Ormskirk. This approach would be in addition to site allocation at Skelmersdale town centre and would vary from	Comments noted. Re. Response B: It is considered that a retail park of the size of Cheshire Oaks could not be

ID	Representor Comments	Council Response
	<p>recommendations in the West Lancashire Retail Study. Ormskirk town centre is currently performing relatively well but physical constraints exist to finding development sites as a result of the historic core and one way system; however, it needs to evolve and reinforce the commercial offer in order to remain competitive with other shopping and leisure destinations. The redevelopment potential of existing or likely future underused areas within the town centre would be investigated. It could also justify the development of an area based policy / strategy specific to the town centre.</p> <p>Response A - Allocate new town centre uses in Skelmersdale and Ormskirk Re Option 3 Allocate a non-town centre site for a retail warehouse park. This would be a radical approach, again varying from recommendations in the West Lancashire Retail Study and would seek to address the lack of a quality retail warehouse park in the Borough. It would look to reduce the loss of residents' non-food spending from the Borough by allocating an accessible site for a non-food retail warehouse park outside existing town centres, therefore acknowledging that town centre sites were unavailable and / or unsuitable. The most likely location would be either Ormskirk or Skelmersdale. However, this approach would not be without risk in terms of developing a potentially competing attraction with existing town centres.</p> <p>Response B ..This approach would be compatible with our suggestion of a Cheshire Oaks/Warrington Gemini Retail Park type model, as indicated above, and could be combined with the need to provide a site suitable for the retail needs in the North of the Borough.</p>	<p>justified in West Lancashire, not least because there is not the expenditure capacity to accommodate it.</p>
42	We have no comment at this time.	Noted.
46	A mixture of Option 1. and Option 2.	Comments noted.
47	<p>Ormskirk town centre is already an integrated development with housing, retail and employment in close proximity. But it is being undermined by out of town developments. I would like to see more focus on increasing footfall in Ormskirk town centre and thinking what is needed for retail and cafes, bars etc to thrive in the town centre.</p>	<p>Comments noted. It is agreed that increasing footfall in Ormskirk Town Centre would be beneficial.</p>
48	<p>Option 1 is fine if Skelmersdale is the focus for housing and industrial development in the future. However, Ormskirk has declined as a centre due to parking costs and the loss of bespoke and smaller traders. There should be a policy to develop Ormskirk as a market town with a distinctive mix of smaller shops and offices. The policy must reflect the detrimental effect trading estates have on traditional town centre vibrancy.</p> <p>If there is a proven need for small retail development in the north of the borough (option4) then Tarleton is the obvious choice. However, the [population living in rural areas must expect to travel to the larger centres for the major shopping experience.</p>	<p>Comments noted. It is agreed that a policy specific to Ormskirk is worth looking at. Comments regarding Tarleton and rural areas are noted.</p>
61	Options 1 & 2 seem the most appropriate because of better road links for deliveries to the site & for customer access.	Comments noted.
64	No comment.	-
69	Continue option 1	Noted.
72	Keep large vehicles on motorways and distributor roads away from where the general population live.	Comments noted.
73	No comment.	-
75	<p>Economic Policy Issue 6: Sites for Town Centre Uses</p> <p>We welcome the option of allocating a site to meet retail needs in the north of the Borough. This supports Lancashire County Council's objectives of reducing unnecessary vehicle movements and ensuring local access to convenience services and fresh produce. However, the size of any retail development should be proportionate to the surrounding villages.</p>	<p>Comments noted.</p>

ID	Representor Comments	Council Response
78	If rates are now low more shops will be used towns more vibrant - at least same income for council?	Comments noted; it is accepted that the more shops and local businesses there are in town centres, the more vibrant it should be.
82	Retail warehouse parks destroy independent local businesses. Skelmersdale needs investment.	Comments noted.
87	Burscough Parish Council supports the revitalisation of Ormskirk Town Centre and the freezing of car parking charges there. The current designation of Skelmersdale Town Centre as a strategic development site remains hugely important to West Lancs	Comments on Ormskirk and Skelmersdale Town Centres noted.
96	AIUH make no specific comment in these respects.	Noted.
97	<p>National policy and previous advice to the Council has directed retail development towards key centres, and has clearly identified the very substantial extent of comparison expenditure leakage both in terms of higher order goods and bulky goods. In general terms, the established approach has been to direct retail development towards Skelmersdale and despite substantial planning activity the delivery of those uses has not occurred.</p> <p>It is our recommendation that the case for retail development and other town centre uses in Skelmersdale to supplement the Concourse remains absolutely clear, and should remain the overriding objective. The new development should add to the existing offer, but we strongly encourage that the resultant policy wording should afford appropriate weight to regeneration and improvement to the town centre offer.</p> <p>Clearly if the Council decides to identify a need for a retail warehouse park, the first option should be within or close to Skelmersdale town centre. Only where that proved impracticable should the Council look to consider an out-of-centre site. We conclude that Option 1 is the preferred way forward to meet long-held objectives.</p>	<p>Comments noted. Skelmersdale is the highest town in the West Lancashire settlement hierarchy, and has, under current policy, been the primary location when considering the location for new retail floorspace.</p> <p>Comments on the Town Centre are noted.</p>
99	No comment.	-

Question 21: Are there any other economic policy issues that should also be considered? If so, what are they?

ID	Representor Comments	Council Response
2	Tunnel vision with Skelmersdale isn't the way to go	Comments noted.
10	<p>At the recent planning meeting regarding Whalleys 4 both the developer, Keepmoat, and the some members of the Council appeared to have the idea that "if you build it they will come". I suggest that existing light industrial zones such as Pimbo are given priority in attracting new and varied businesses including high-tech such as IT etc. Together with improved housing and retention of a pleasant and desirable landscape more scope would be opened to young professionals who would otherwise have to travel some distance. In order to flourish professional people must be attracted. This in itself would have a trickle-down effect in improving lifestyle choices and therefore better health and life expectancy. I think it's true to say that we live in an aspirational culture and this is something that needs strengthening particularly in certain areas of Skelmersdale.</p>	<p>Comments noted.</p> <p>It is agreed that the attraction of quality employment, creation / maintenance of an attractive environment, and attraction / retention of professionally qualified people to Skelmersdale should be an aim, in order to help improve / regenerate the town.</p>
14	that edge hill university has massive economic importance and this should be encouraged and worked with in partnership	Comments noted; the benefits and potential of Edge Hill University are recognised by the Council.
17	<p>We have been instructed by The Skelmersdale Partnership who own the Concourse Centre to submit representations in respect of the emerging draft West Lancashire Local Plan Review Issues & Options Consultation. Our clients have owned the Concourse Centre since March 1997. It was constructed by the Commission for New Towns in the 1960s and is built over 3 floors with the main trading floor (two thirds of the retail space) on the first floor. We attach a site location plan and floor plans of the Centre. The Centre was originally designed for pedestrians and vehicles to be kept separate and therefore integration between car parking and the Centre is difficult. Access to the main trading floor is via a number of pedestrian bridges from the surrounding areas. In the 1980s the Centre was subdivided to include a 3 level multi storey car park which does not link directly into the trading floors of the Concourse at all levels. As a result, the distance between the car park and the shop floor is much larger than modern retail shopping centres. In order to traverse the centre it is necessary to travel between different levels by ramps, escalators, stairs or lifts. This makes trolley shopping particularly difficult. Not only does this negatively affect shoppers but it also results in a lower spend per trip as people tend to make smaller basket sales. As a result, the Concourse is particularly vulnerable to new shopping development either within the Town Centre or within its catchment area.</p> <p>The internal arrangement of the Centre is extremely tired. This is an inevitable consequence of the age of the Centre. Furthermore as can be seen from the submitted floor plans, a number of the large retailers occupy floorspace that is irregularly shaped, some of which is compromised by supporting pillars. This format is not ideal for some large space retailers who prefer a more regular layout which allows them to optimise and customise their store design.</p> <p>The Centre has struggled in recent years, there are currently a number of long term vacant units at the Centre. Including the second floor which is completely vacant other than some storage and represents about 10% of the overall floorspace. The Centre is currently 35% vacant. This level of vacant space is difficult but manageable. However, the current trading position of the Centre is fragile and it is vulnerable from other retail development in the town centre and elsewhere. For example, the owners remain extremely concerned about the impact of the St Modwen</p>	<p>Comments noted.</p> <p>It is acknowledged that the Concourse Centre has formed the key part of Skelmersdale Town Centre's retail offer for decades, and that the Centre has lately been struggling for a variety of reasons. The request to continue to protect the Concourse Centre by means of planning policy is acknowledged; this makes sense.</p> <p>In terms of the St Modwen development, this has received planning permission, subject to conditions (including preventing the occupation of units in the proposed scheme by occupiers of the Concourse) and has also survived a legal challenge. As such, the scheme cannot be 'deleted'.</p> <p>Retail studies have shown capacity (and need) for extra retail and leisure floorspace in Skelmersdale Town Centre. Whilst additional housing in and around the Town Centre is supported, it is not considered that this should replace or substitute the St Modwen scheme.</p>

ID	Representor Comments	Council Response
	<p>development on the Concourse Centre. They have held a number of meetings with the Council to express their concerns and would prefer to see the site developed for housing.</p> <p>For the reasons outlined above, the Concourse Centre is 'protected' in the Council's current Local Plan. In particular Policy SP2 of the Local Plan states that any new retail development in Skelmersdale Town Centre: "should not harm the vitality of the Concourse Centre and must provide sufficient linkage to the Concourse."</p> <p>The continuation of this policy protection is specifically supported. Furthermore, the retention and regeneration of the Concourse Centre is supported by a large number of residents and retailers. We attach a number of letters in support of the Concourse Centre.</p> <p>Turning to Skelmersdale Town Centre, the last retail study dated December 2011 concluded that the town had progressively lost ground in the national retail rankings with the pace of decline accelerating in recent years. A number of High Street retailers had all left the town e.g. Dunnes and had not been replaced.</p> <p>Other deficiencies include the fact that most comparison retail outlets in the town operate at the lower end of the retail spectrum; the very weak food and drink offer with no high quality restaurants, coffee shops or family eating places, only some public houses and no cinema or other leisure facilities. Furthermore, there is considerable leakage of comparison goods, expenditure leaking to destinations beyond the Skelmersdale town catchment area.</p> <p>In view of the above, the Town Centre is exceptionally weak for a town with a population of some 40,000 people and that it fails to function effectively as a town centre. We do not believe that the St Modwen scheme will do anything to correct this decline. Whilst it may offer the opportunity to provide a modern retail development with free car parking, all that it will do is to further assist with the decline of the Concourse Centre by eventually attracting all of the tenants from the Concourse Centre to the St Modwen development. Accordingly we do not believe that there will be any net benefits to the Town Centre.</p> <p>Recommendation So we believe that the Local Plan review is correct in continuing to identify the regeneration of Skelmersdale town centre as an important objective. However, we believe that the Concourse Centre must continue to be protected as per the existing adopted Local Plan i.e. Policy SP2. The reason being that the Centre is now even more fragile than it was during the preparation of the adopted Local Plan and so it is important that specific measures are put in place to ensure that its regeneration takes place. In doing so we would specifically request that the St Modwen scheme is deleted from the Town Centre and that retail and leisure uses are not considered appropriate for the site rather it be identified for residential development.</p>	
18	no comment	-
20	None at this time.	Noted.
26	As mentioned above, consideration should be given to sport as an employer and training for local populations.	Comments noted.
30	<p>The increase in online shopping, particularly by Skem residents who have never had a Town Centre bookshop and similar specialist shops. The retail /trade shops on the Skem industrial estates for businesses that would be normally found in Town centres. It is unusual that a large firm of solicitors is based on Gillibrands rather than in a Town cente office block.</p> <p>Effects of Brexit , Housing for asylum seekers , who are not allowed to work and who contribute to the unemployment figures.</p>	Comments noted - there are a number of 'unusual features' relating to Skelmersdale; where possible / appropriate, these need to be taken into account in planning policy terms.

ID	Representor Comments	Council Response
31	none come to mind	Noted.
32	Investment in SME 's (small to medium enterprises) in our town and village centres is essential, shuttered up shops are not good for a healthy economic environment, if investment can be made into small businesses in our towns and villages it may go some way to preventing them becoming dormitories for people commuting to Manchester and Liverpool along already overburdened road infrastructure.	Comments noted. It is agreed that attraction / retention of SMEs in town and village centres (and elsewhere) is important, in order to improve the local employment offer.
34	<p>Section 3 Reinvigorating Town and Village Services</p> <p>We promote using waterways as an asset in creating a sense of place. We are currently working with the Parks department on a project to create a Linear Park along the River Tawd. Part of this is to reduce a current pollution problem through the installation of reed beds but it will also help to create a sense of place within Skelmersdale. The Linear Park will provide a place for recreation and associated health benefits and should positively impact the visitor economy. Waterways present an asset to the borough and it is critical that they are given value and enhanced. Reference to waterways could be incorporated into the Economy Paper.</p> <p>Flooding and the Economy</p> <p>Paragraph 1.2 of the Environmental Paper discusses the potential impact of flooding on an area's economy for agricultural and horticultural industries and built-up areas however, there is no mention of this within the Economy Paper. We recommend that the Economy and Environment Papers are tied together with a section in the Economy paper to strengthen this relationship.</p> <p>Through helping businesses to become flood resilient/adapt to climate change the economic risk/recovery costs can be reduced overall. Consideration should Also be giving to using CIL to raise funds for flood protection for existing developments. By helping existing businesses and residential areas be more resilient to flood events we can reduce the economic impact of flooding whilst assisting areas to adapt to climate change.</p>	<p>Comments on waterways noted. It is agreed that waterways are an asset in creating a sense of place and can add value to the economy. The Council supports the Tawd Valley Park project.</p> <p>Comments on flooding also noted. The Local Plan Review will eventually be one document, rather than five separate papers, so a 'linking statement' should not be necessary. The environmental / economic aspects of flooding should be mentioned. Whilst flood prevention measures are infrastructure and could in theory be paid for by CIL, new developments should not increase flood risk (they require mitigation measures) and so CIL monies from them should not be spent on flood prevention. As such, 'flood protection' is not on the Council's Regulation 123 List.</p>
39	Response A - Underlying all of this responsible planning is the conflicting threat of fracking, which has not been mentioned in the Local Plan and which will bring to nothing these worthwhile aims and endeavours unless it is robustly resisted. There seems to be little effective democratic defence to the Central Government's will in relation to this, so it is imperative that WLBC is aware of this threat and takes legal advice to ensure that its plans will not be jeopardised and that WLBC take legal steps to guarantee that their plans do take precedence over this commercial threat.	Comments noted. The Borough Council is aware of the issues relating to fracking. Ultimately, decision-making on fracking is the responsibility of Lancashire County Council rather than WLBC, which is why the matter is not addressed in the Local Plan Review.
42	We recommend that your authority addresses the economic value of the borough's natural capital and the ecosystem services that such capital provides. The UK Government's Natural Capital Committee recently published "How to do it – a natural capital workbook". This practical guide and its supporting valuation paper are aimed at anyone who wants to use natural capital approaches in making decisions about the natural environment. These documents are intended to support decision-makers, including planners, communities and landowners, but have particular relevance for place-based decisions. Please see https://www.gov.uk/government/groups/natural-capital-committee for summary background and a link to the draft workbook. Please contact us if you wish to explore this further.	Comments noted. Council officers are aware of the concept of natural capital; it is agreed that its use in decision making would benefit the natural environment, as well as the economy.
44	West Lancashire, particularly Skelmersdale, needs to attract and create a more highly skilled, more affluent work force with a good work-life balance. Highly skilled businesses are more effective at growing the local economy than large, land hungry warehouse units that provide limited employment opportunities and whose profits go to shareholders outside of West Lancs. Owners of highly skilled businesses are more likely to relocate here if we	It is agreed that attraction / retention of a highly skilled workforce in the area, Skelmersdale in particular, would be of great local benefit. This is one of the goals of planning for West Lancashire; it is also agreed that, accompanying the employment, good

ID	Representor Comments	Council Response
	create aesthetically pleasing housing developments and smaller business units.	quality local housing should be provided, again particularly in Skelmersdale.
45	West Lancashire, particularly Skelmersdale, needs to attract and create a more highly skilled, more affluent work force with a good work-life balance. Highly skilled businesses are more effective at growing the local economy than large, land hungry warehouse units that provide limited employment opportunities and whose profits go to shareholders outside of West Lancs. Owners of highly skilled businesses are more likely to relocate here if we create aesthetically pleasing housing developments and smaller business units.	It is agreed that attraction / retention of a highly skilled workforce in the area, Skelmersdale in particular, would be of great local benefit. This is one of the goals of planning for West Lancashire; it is also agreed that, accompanying the employment, good quality local housing should be provided, again particularly in Skelmersdale.
46	The need for 'incubator' units for the development of new business working in conjunction with Edge Hill University and West Lancs College.	Comments noted.
48	We should be aware that warehousing provides little and mainly low paid employment for the area of land used. Encouraging more labour intensive business with reasonable wage prospects should be a priority.	Comments noted; a variety of businesses / jobs should be provided / facilitated in the Borough, to give people a choice of employment.
50	<p>This Topic Paper discusses economic issues in West Lancashire, and is divided into two distinct sections:</p> <ul style="list-style-type: none"> ☑ Stimulating Economic Growth; and ☑ Reinvigorating Town and Village Centres. <p>The first section considers the future role of, and appropriate uses for, existing business and industrial areas, as well as the provision of new sites for employment development, while the second section looks to support the network of town and village centres in the Borough, promoting their future health through permitting suitable uses, and planning for appropriate future development opportunities to meet their specific needs. Rather than suggest specific policies at this stage, the paper presents the following six economic policy issues:</p> <ul style="list-style-type: none"> ☑ Providing the Right Scale, Mix, and Distribution of Employment Land; ☑ Existing Employment Areas; ☑ Spreading Economic Opportunities by Supporting the Rural Economy; ☑ Network and Hierarchy of Centres; ☑ Ensuring Healthy Town, Village, and Local Centres; and ☑ Sites for Town Centre Uses. <p>While the holistic nature of Transport Planning means that policy can often have implicit effects on transport use and habits without explicitly addressing the subject, this review focuses on the tangible impacts, specifically those that are likely to have an impact on the operation of the SRN.</p> <p>In this context, there are few issues likely to have a significant implications for the SRN directly.</p> <p>Providing the Right Land However, the first Economic Policy Issue, Providing the Right Scale, Mix, and Distribution of Employment Land, does present the potential for impacts on the SRN. The Economic Policies Topic Paper presents four options on what type of employment land is required and where specific types may be appropriate. These options are summarised as:</p> <ol style="list-style-type: none"> 1. Allocate sites specifically for strategic distribution and warehousing needs; 2. Allocate sites to encourage geographical clusters of specialist employment uses; 3. Allocate all new sites for the range of B classes uses (business, general industry and - warehousing); and 4. Increase town centre office sites. <p>It is noted that these options are not mutually exclusive. From the perspective of Highways England, Option 1 is preferred over other options, or at least Option 1 in combination with other elements. Particularly under a scenario where West Lancashire looks to fulfil an under provision of large-</p>	<p>Comments on Issues 1 and 2 have been copied to Q15/16 above; WLBC's responses are as above.</p> <p>In terms of the "Key Points" - comments noted; it is not always possible to predict with certainty the exact nature of the future use of a site.</p>

ID	Representor Comments	Council Response
	<p>scale logistics in neighbouring authorities, the ability to plan infrastructure requirements will be better facilitated through the precise determination of allocated sites' locations and size. However, it is anticipated that there is a requirement for employment allocations beyond largescale logistics. It may therefore be appropriate to allocate specific strategic sites with smaller generic employment sites available for all use types.</p> <p>Existing Employment Areas</p> <p>Economic Policy Issue 2 discusses four potential options for existing employment land uses within the Borough. These are summarised as:</p> <ol style="list-style-type: none"> 1. Continue with the existing Local Plan approach; 2. Protect all existing employment areas for business class employment uses; 3. Designate selected employment areas either wholly or in part for non-business uses; and 4. Do not protect employment areas for B1, B2 and B8 uses. <p>Highways England's key guidance document, The Strategic Road Network: Planning for the Future (2015) states that: - "Capacity enhancements and the infrastructure required to deliver strategic growth should be identified at the local plan stage. In this way options for road capacity enhancement or other transport infrastructure to support strategic development sites can be considered long before the planning application stage."</p> <p>Where there is a greater degree of uncertainty over the use-class of a site, it will be more difficult to predict the likely impacts of the site on the local and strategic road networks; Option 4 in particular does not protect any land for employment use, instead allowing market forces to dictate the appropriate mix of uses within existing employment uses.</p> <p>We therefore would prefer that those options promoted facilitate a degree of certainty over the use-type of existing sites, allowing more accurate planning of infrastructure and lessening unforeseen impacts.</p> <p>Key Points:</p> <p>☑ While the Economic Policy Options Paper does not present many topics likely to have significant direct implications for the SRN, Highways England would look to promote and support those options that create a greater degree of certainty in the location, type and scale of development. This certainty will enable more accurate forecasts of vehicular demand, and facilitate the determination of any infrastructure requirements.</p>	
52	<p>The Economy: Act to reduce empty shops, closed pubs, closed PO building etc. Liaise with businesses: what do they want? What would bring them here? Scope for business development linked to Edgehill? E.g. media businesses. And what else do Edgehill do? What links could be formed between business and Edgehill? And a better rail link from Burscough to Liverpool (and Preston) would be good for business as well as commuters.</p>	<p>Comments noted and generally agreed.</p> <p>Town Centres policy should seek to reduce empty units.</p> <p>The Council liaises with local businesses and seeks to attract other companies to the Borough.</p> <p>The Council also liaises with Edge Hill University, and attracting University-related businesses is a WLBC objective.</p> <p>It is agreed that improved rail links would be good for businesses and commuters.</p>
53	<p>West Lancashire and particularly Skelmersdale needs to attract and create a more highly skilled, more affluent work force with a good work-life balance.</p> <p>Highly skilled businesses are more effective at growing the local economy than large, land hungry warehouse units that provide limited employment opportunities and whose profits go to shareholders outside of West Lancashire.</p> <p>Owners of highly skilled businesses are more likely to relocate here if we create aesthetically pleasing housing developments, smaller business units and more supported recycling instead of Whitemoss tip expansion with dangerous toxic fumes!</p>	<p>It is agreed that attraction / retention of a highly skilled workforce in the area, Skelmersdale in particular, would be of great local benefit. This is one of the goals of planning for West Lancashire; it is also agreed that, accompanying the employment, good quality local housing should be provided, again particularly in Skelmersdale.</p> <p>The decision on Whitemoss Landfill was made by central government, rather than locally.</p>

ID	Representor Comments	Council Response
55	<p>I wish to comment on the Options paper in so far as it relates to the economic development of Skelmersdale.</p> <p>General Comments</p> <p>2. The Paper identifies the various factors necessary for stimulating economic growth. In my opinion three particularly important factors are:</p> <ol style="list-style-type: none"> a) The creation of jobs; b) measures to ensure that local people increase their levels of skills to cater for the provision of local jobs that are more varied and of higher productivity, which will lead to higher incomes; and c) the creation of opportunities for local wages to be spent in the local economy (what is described in the Paper as increased “claw back”). <p>3. However, I believe that hitherto the Council has been too preoccupied by a) above (job creation), particularly at the low-skilled end of the job spectrum such as is found in the warehousing and distribution sectors, at the expense of the other two factors.</p> <p>4. I believe this is the case because it is plain that the major economic problem facing Skelmersdale these days is not unemployment or a lack of low-skilled or entry level job opportunities, but low pay in many jobs, meaning that many Skelmersdale people do not have the purchasing power to contribute a healthy local economy; and those people that do have a healthy disposable income often have to travel outside of Skelmersdale to spend it because of a lack of retail and leisure opportunities in the town.</p> <p>5. Skelmersdale may have had high levels of unemployment in the past, but the most recent figures publicly available suggest that it does not now have an unemployment rate much above the regional or national average, and anecdotal evidence from people working in the field suggests that economic hysteresis may have set in and few Skelmersdale people now left on the unemployment register have the skills or ability to benefit from many of the new jobs that will be created. Indeed, the large number of EU citizens who have moved into the area to take up work with Skelmersdale’s employers suggests that the employers are increasingly having to look to non-local sources of labour.</p> <p>6. Concentrating too much on low-skilled job creation, such as is common in the warehousing and distribution sector, is not likely to benefit local residents or the local economy to any great degree, as it may just lead to greater job vacancies and/or yet more people moving into the area to take up work. Whilst we would not like to see a loss of jobs locally, a greater concentration on b) and c) above (upskilling the local workforce and higher productivity, together with providing increased opportunities for people to spend locally) would have a more significant effect on the local economy, because a corollary of higher skills and productivity is higher wages and a greater disposable income, with the usual knock-on effects that can create a virtuous circle of higher spending leading to more jobs (and more varied jobs) and more local disposable income available for spending locally.</p> <p>7. Upskilling is vital, and I would like to see the Council devoting more resources to working with the local institutions (Edge Hill, West Lancashire College etc.) to provide more skills training, and hopefully tie-ups between the institutions and local employers who require specific skills. The Council’s role as a facilitator in the process will be vital.</p> <p>8. With higher pay and greater disposable income available as a result of this, the Council’s plans for the regeneration and redevelopment of the Skelmersdale town centre are strongly supported, and the increased leisure and retail opportunities it will provide should contribute to increasing local prosperity.</p>	<p>Extensive comments noted.</p> <p>It is agreed that improving local skills (and providing suitable jobs for skilled workers), and encouraging local expenditure are important and laudable objectives, and that liaison between educational establishments e.g. Edge Hill University and employers, to provide and fill skilled positions, is a good way to address this issue.</p> <p>The Council considers there is still scope for more distribution jobs, however, and some of these may be skilled.</p> <p>Comments on specific paragraphs / options noted.</p>

ID	Representor Comments	Council Response
	<p>Specific Comments on the Paper</p> <p>Paras 2.1 and 2.2 – Agreed, particularly on the proposed complementary policy support, particularly for new or emerging business sectors.</p> <p>Para 2.6 – Agreed. Some industrial land in Skelmersdale has lain empty and unoccupied for decades. Clearly the use of this land needs reviewing.</p> <p>Para 2.7 1) – Disagree. The demand for strategic distribution and warehousing may not be there (the site at Firswood Road, Lathom was approved for such use nearly two decades ago; half the site remains undeveloped and, of the rest, the ex-Comet site was empty for years) and, in any case, this involves the use of huge areas of land for relatively few jobs (lots of automation) and such jobs as there are are not particularly highly skilled or well paid.</p> <p>Para 2.7 2) – Agreed. This is where the Council’s role as a facilitator between businesses and local educational institutions would come to play.</p> <p>Para 2.7 4) – If the local economy can be made more prosperous and varied there should be an increased demand for offices which should be catered for.</p> <p>Para 2.8 – I would support any options that provide for greater flexibility of sites. It is hard for councils to second-guess what will be the major drivers of the economy in the future, so flexibility is the key. Clearly housing and industry should not be mixed, but some commercial uses are compatible with housing development as a mixed-use development or side by side.</p> <p>Para 3.2 – Agreed. The council is clearly aware of the issues.</p> <p>Para 3.10 1) – Broadly supported. The Council’s current plans for Skelmersdale town centre should be supported and expanded where possible. The development of a night time economy in Skelmersdale will be vital for retaining spending power in the town.</p> <p>Para 3.10 3) – Not supported. An out of town retail warehouse park may kill off the new Skelmersdale town centre before it has had a chance to get started. I suggest the Council revisits this idea in another 10 or 15 years.</p>	
61	Potential competition to town centre sites should be considered if Option 3 is included alongside transport links and public transport options.	Comments noted; out-of-centre retail parks will have impacts upon town centres.
63	<p>The Plan has to look at strategies for attracting better quality jobs into the area, preferably renewable energy manufacturing companies. Local businesses should be encouraged to liaise more with Educational establishments creating more work placements and opportunities to show young people how enjoyable work can be and that it provides a sense of pride and dignity.</p> <p>The road networks to be changed so you don’t have to drive half a mile in the opposite direction before going in the direction you want. Traffic in Skelmersdale is so low volume you can open up dual carriageways to allow vehicles to cross the dual carriageway. You can also provide a way out of the Concourse car park without having to drive all the way around the Cooperative Bank. This costs driver so much in money and people with air pollution.</p> <p>According to the WHO, fumes (PM2.5) from diesel engines cause lung cancer. There are no safe levels at all. Policies should to drawn up to make taxis turn their engines off when stationary at the Concourse and at Asda. Policies to encourage car share systems.</p> <p>It would be good to show us the plan for the ‘alleged’ railway. Where will the station be and what route(s) will it take? People need to see this.</p>	<p>It is agreed that attraction / retention of a more skilled employment in the area, around Skelmersdale in particular, would be of great local benefit. Liaison between employers and educational establishments would be a good idea, although beyond Local Plan policies. (Council officers are involved with apprenticeships.)</p> <p>Comments on traffic and the road network are noted; Lancashire County Council is the highways authority for West Lancashire. Similarly, whilst it is agreed that measures should be taken to reduce air pollution by vehicles, some of the suggested measures are beyond planning policy powers.</p> <p>The study into the precise location of the proposed railway is ongoing; once published, the route can be made public.</p>
64	Our Clients support the growth of Skelmersdale Town Centre, alongside employment and housing.	Comments noted.
67	see attached statement	-
70	The Economic Policy Options Paper covers areas such as the economy, employment land, job - opportunities, rural employment and retail. Whilst the Commissioners do not have any specific comments on this paper at this stage, it is emphasised that given the issues raised within the	Comments noted.

ID	Representor Comments	Council Response
	<p>Strategic Policy Options Paper, that there is a clear need to promote economic development and jobs growth within the Borough over the plan period in order that sustainable patterns of development can be supported. Part of the rationale of the Local Plan Review, which is to seek to maximise growth opportunities such as Liverpool2, further confirms that view. For this reason, the balance between jobs and new homes is critical and we would expect the evidence which accompanies the Local Plan Review to demonstrate that this balance has been appropriately achieved. The Commissioners believe that as a result of this, further housing land will need to be identified and that the Council will need to consider the release of further Green Belt land (subject to an up to date Green Belt Study).</p>	
72	<p>Yes, its simple really. Make sure that no matter where you live in the Borough there is sufficient appropriate housing for you to live near your relatives. That will encourage younger people to stay and invest their talents in West Lancashire. Take the blinkers off regarding the huge extent of the green belt particularly where it is not good quality agricultural land and sensitively grow the existing smaller settlements around Mossy Lea Road which are ripe for growth and investment.</p>	<p>Comments noted; retention of young people (workers) is an agreed goal of planning for the Borough, as is provision of suitable housing.</p>
73	<p>Edge Hill University agrees that it will be important for the new Local Plan to encourage economic growth in the Borough by including policies which provide the right scale and mix of employment sites, a better connected West Lancashire, support the rural and visitor economy and take advantage of knowledge and skills</p> <p>10. In terms of the potential options presented by WLBC, the University supports the acknowledgement that it may be appropriate to allocate specific sites / broad locations where geographical clusters of specialist employment uses will be focused. Ormskirk would be an appropriate location for such 'clusters' given the presence of the University.</p>	<p>Comments noted.</p>
75	<p>The Spatial Portrait Paper provides information on the nature of deprivation in West Lancashire. The Strategic Development Paper highlights the need to tackle deprivation and reduce inequalities in order to deliver the draft local plan objectives of A Healthy Population and Reduced Inequalities. It also flags up future economic growth and the provision of a skilled local workforce as a key issue for West Lancashire.</p> <p>The Economic Policy Options paper examines the merits of various approaches with regard to economic growth but does not appear to consider economic growth as a means of addressing the persisting issues of unemployment and income deprivation within the most deprived areas. The individual domains of deprivation that contribute to the overall IMD score should be considered when preparing the Preferred Options Paper. For most of the domains, Skelmersdale stands out as a consistent outlier, and employment and income are key drivers of the current situation. Figure 2 displays 2015 Employment deprivation by ward. (see PDF for charts)</p> <p>It is recommended that access to employment, education and training should be a key consideration in the development of the Preferred Options Paper, taking account of employment, education and training as Wider Determinants of Health. Local Plan policy preparation should be informed by asking how future developments can make the residents of the deprived areas significant beneficiaries of any economic growth that may occur.</p> <p>Economic Policy Issue 1: Providing the Right Scale, Mix and Distribution of Employment Land - Option 1 may result in the allocation of large sites for strategic distribution and warehousing uses, most likely in the M58 corridor, however this location may not necessarily be the most accessible for all West Lancashire residents. It is critical that access to employment opportunities is fully considered particularly with regard to access by Skelmersdale residents.</p>	<p>General comments noted.</p> <p>The Plan does in fact consider economic growth as means to address unemployment and income deprivation; there is a clear link between the two. Similarly, the Plan and evidence base make clear that issues relating to deprivation in Skelmersdale are known; this is a primary reason for the focus on Skelmersdale.</p> <p>Comments on specific issues are copied and responded to under each individual issue.</p>

ID	Representor Comments	Council Response
	<p>Economic Policy Issue 3: Spreading Economic Opportunities by Supporting the Rural Economy We welcome Option 2 of allowing for proportionate increases in development in rural areas through a more permissive approach, subject to detailed transport considerations. This option has the potential to deliver positive effects in terms of health and social inclusion benefits and rural employment opportunities.</p> <p>Economic Policy Issue 4: Network and Hierarchy of Centres We welcome the option of a review of the existing hierarchy with regard to increasing choice and accessibility to retail, employment, community services and facilities within the centres. Any changes to the hierarchy should take account of impacts on sustainability with particular consideration given to accessibility for residents from deprived areas, social and rural isolation, and detailed transport considerations.</p> <p>Economic Policy Issue 5: Ensuring Healthy Town, Village and Local Centres – Appropriate Uses The options for this policy include to review the policy approach to determining appropriate uses in town centres. This policy option could be used as part of a drive to promote healthier lifestyles in West Lancashire by limiting the amount of, and convenient access to, inappropriate uses. In particular, the policy option could be used as part of a drive to tackle health indicators associated with obesity and alcohol consumption. The Sustainability Appraisal states that: - "Option 3 offers the Council more opportunity to influence the types and balance of uses within Town, Village and Local Centres and is likely to be the most sustainable option. This could include a restriction on the number of fast food outlets or bars within a certain area. This could have a significant positive effect upon the social aspects of sustainability in terms of encouraging healthy lifestyles for those living in these centres, and perhaps lessening the incidences of anti-social behaviour linked to the consumption of alcohol. However there may be a slight negative impact upon economic sustainability since there is a potential risk that this may result in empty units if there are no alternative competing uses to occupy them." It is recommended that consideration should be given to the development and inclusion of policies that contribute to healthy town centres to address specific health inequalities. This approach could also be extended to local and district centres. An example of this would be the inclusion of policies that look to limit the percentage of building uses allowed in the town centres, and local and district centres, for hot food takeaways, drinking establishments and even tanning salons, in order to encourage healthier lifestyles. This would reflect the commitment outlined in the Lancashire County Council Local Government Declaration on Healthy Weight to 'Consider supplementary guidance for hot food takeaways, specifically in areas around schools, parks and where access to healthier alternatives are limited'</p> <p>Economic Policy Issue 6: Sites for Town Centre Uses We welcome the option of allocating a site to meet retail needs in the north of the Borough. This supports Lancashire County Council's objectives of reducing unnecessary vehicle movements and ensuring local access to convenience services and fresh produce. However, the size of any retail development should be proportionate to the surrounding villages.</p>	
77	To lower rates to local traders therefore encourage more people to invest and shop/use and helps to keep places more vibrant.	Comments noted; whilst keeping places vibrant is a laudable objective, lowering rates to local traders is beyond the scope of the Local Plan.
78	As above 20 and encourage businesses that attract the now large student population	Comments noted.

ID	Representor Comments	Council Response
87	<p>Section 2 Stimulating Economic Growth - Rural businesses are mentioned as being "important and need to be supported."</p> <p>These are predominantly farming and farms and as we all know there is a huge debate about the closure of the 5 pumping stations which will have a direct impact on the drainage of agricultural land and also the use of agricultural land for further housing developments.</p> <p>The Borough Council should be making a concerted effort to come up with an acceptable funding regime for the threatened pumping stations and resisting any further inroads into agricultural land for housing developments. The issue of surface water flooding, as outlined above, must be addressed so that negative impacts on the economy and transport infrastructure that is needed for the economy, are not negatively impacted.</p>	<p>Comments on pumping stations noted; this issue is largely out of WLBC's hands. Discussions should be held with the Environment Agency and Lead Local Flood Authority on this issue. Surface water flooding will be addressed in Plan policies.</p>
89	<p>West Lancashire have produced the Economic Policy Options Paper which considers the options for stimulating economic growth within West Lancashire. Paragraph 2.1 of the Economic Policy Options Paper identifies the key issues relating to Economic Growth within the area one of which is the following: - "The West Lancashire economy continues to grow which requires land to be allocated in the right location to meet a range of business needs (both large and small, established and new)."</p> <p>Our Client agrees with the identification of this as a key issue for the Borough and seeks to support West Lancashire in meeting these needs in accordance with Paragraph 157 of the Framework.</p> <p>West Lancashire identifies within paragraph 2.5 of the Paper that Burscough functions as an existing business centre when it states: "West Lancashire has experienced a prolonged and steady increase in jobs and this is forecast to continue into the future through the expansion of existing businesses and development of new ones. Land will be required to meet these business development needs. The principal existing locations of economic activity are Skelmersdale, Ormskirk and Burscough.... Burscough town centre has a moderate commercial core, however there are several employment areas in the town including the sizeable Burscough Industrial Estate."</p> <p>Our Client confirms and agrees with the Council's observations but would seek for additional employment development to be located within this well-established location.</p>	<p>Comments noted, including agreement with our identification of key issues, and on employment land in Burscough.</p>
96	<p>AIUH make no specific comment in these respects.</p>	<p>Noted.</p>
97	<p>St. Modwen make no specific comment in these respects.</p>	<p>Noted.</p>
99	<p>Our Clients support the growth of Skelmersdale Town Centre, alongside employment and housing.</p>	<p>Comments noted.</p>
113	<p>Thank you for the opportunity to meet your team in Parbold at the W . I. to " Have your Say". It was good to see democracy at work. Whether it produces any results for you we wait to see. Our company, Northern Diver moved to West Lancs to a base on East Quarry Appley Bridge some 22 years ago. From a staff of 10 we now employ 43 with many subcontractors in the local area. We have almost reached the development potential on our current site and would like to remain in the area. Trying to find an industrial site is very difficult.</p> <p>There are minimal opportunities in Skelmersdale but most are not suitable. The lack of affordable local transport in that area means that 20% of our staff would not be able to work there. We would love to remain in Appley Bridge once the most industrial village in Western Europe (1958). The difference in value of a brownfield site or industrial premises compared to a residential site is enormous. So if you look back over the past ten years and view how many applications have been successful in turning industrial sites to houses I think you will be greatly surprised. It is not just the large sites , its mainly the small starter units .</p>	<p>Comments noted.</p> <p>These are mainly site-specific comments relating to Northern Diver, rather than comments on wider policy options. However, in general terms, it is acknowledged that retention of / encouragement for local businesses is an important general economic consideration.</p>

ID	Representor Comments	Council Response
	<p>So as part of your policy maybe you can view council owned plots for industrial development first or can you because cuts to your budget probably mean it is more beneficial to grant yourselves residential permission.</p> <p>If you zone land in the rural areas , the actual owner will prove there is no requirement by not accepting offers on the site , then a good planning consultant will get involved and that potential site turns into a residential site. Whats the answer- I have absolutely no idea. Maybe you in West Lancs can put your heads together and come up with a solution. We need 5 acres preferably close to J27 of the M6 . In desperation we have started a heavy engineering base in Stockton on Tees. For a current military project to make three man mini subs for a friendly foreign nation. This employs five people currently during the development stage, with a potential 12 jobs over the next 18 months. We would love to bring this back to West Lancashire , for the manufacturing phase. Finally what should we be offering as employers and local officials we at Northern Diver feel that a good education and a potential for a skilled job in the local area should be paramount. If you could assist our expansion plans in anyway please do not hesitate to contact us.</p>	

Question 22: Should West Lancashire retain the Local Nature Conservation Site designation in the future? Which policy option for the management of local nature sites do you think is the most appropriate for West Lancashire? Why?

ID	Representor Comments	Council Response
14	option 1	Noted.
18	no comment	-
19	Option 2 - Nature Conservation and wooded areas are extremely important to all of - we all need to breathe oxygen - without trees and plants there will be no oxygen - trees are the lungs of our planet. These areas need to be protected and enhanced - I would choose the Ecological Network as a more joined up approach. I would also like to see incorporated into this plan tree planting along roadsides walkways wherever possible, and encouragement to home owners to use their gardens for nature rather than car parking or ease of maintenance.	Comments noted.
20	Option 1. no other comments at this time.	Noted.
21	Yes. Protect nature and wildlife manage flood risk.	Comments noted.
23	Option 1: maintaining local control is the most logical approach	Comments noted.
24	Please retain the Local Nature Conservation Sites, Option 1	Comments noted.
26	Yes they should continue with the designations	Comments noted.
27	Yes of course.	Noted
28	All environmental protections should be kept as considerable damage has already been done.	Comments noted.
30	Option 1 Co-operation with landowners.	Comments noted.
31	Option 2	Noted
32	Option 2 is the obvious answer the previous piecemeal approach has proved singularly inadequate on several occasion. We need a holistic joined up strategy to protect our environment in a sustainable way for future generations	Comments noted.
34	Option 1 versus Option 2 Option 2 suggests removing the Local Nature Conservation Site designations from the Local Plan and instead assigning appropriate protection to the Ecological Network. However, in order for us to comment we will need to know what this appropriate level of is. The local nature conservation sites should have the same level of protection as existing otherwise there is a risk to damage to these sites if option 2 is selected in its current form. To ensure that this policy is sustainable and has no adverse effect on biodiversity we strongly recommend that if option 2 is selected then the level of protection is confirmed and specified within any future versions of the Local Plan. The Local Plan may also need to consider in terms of the length of the plan and the habitats which currently have European Protection. It is currently unclear how this will carry over and the Local Plan could assist in recognising the same level of protection.	Comments noted, the Ecological Network is an evidence base assessment undertaken by Lancashire County Council and the Local Plan will designate the assets accordingly. Comments on specifying the level of protection (if Option 2 is chosen) are noted, as are comments on European sites.
39	Responses - Response: Option 1 1. Continue with Local Nature Conservation sites designation in the next Local Plan. Requires assessment of status of sites but retains existing status such as Haskayne Cutting. 2. Remove the local Nature Conservation designation from the local plan. Response A: (Option 1) Retaining existing sites assists in protection against fracking in the areas. Policy 2 puts existing sites at risk.	Comments noted regarding Options 1 and 2. Whilst the Council understands residents' concerns over fracking, this is a matter that is dealt with by Lancashire County Council rather than WLBC.

ID	Representor Comments	Council Response
	<p>Response B:(Option 1) Retaining existing sites retains local democracy. Anecdotally from conversations with employees of the EA, DEFRA was the influence behind the EA's decision to switch off the pumping stations in the Alt Crossens drainage system, leading to the need for an Independent Drainage Board to be set up and funded by local farmers, businesses and Council Tax payers etc. This exhibits the fact that the EA, which has the oversight of fracking, is subject to the influence of DEFRA, which in turn is an executive arm of Central Government. As the Central Government is committed to fracking, ceding local control over Local Nature Conservation sites to DEFRA guidance over the value of such sites and DEFRA's possible vulnerability to political pressure from Central government, could lead to a conflict of interest and could influence objective advice. We feel it would be a catastrophic mistake and lead to a loss of local democracy. As Martin Mere is close to a potential fracking site, it may be advisable to set up a focus group, involving Martin Mere, possibly Edge Hill University and yourselves to jointly assess if there should be more Local Nature Conservation sites added to the existing ones and adding to the Local Plan. Local decision making must be paramount in retaining local democracy.</p>	
42	<p>We recommend Option 2. Dilution of resource and capacity in order to run two parallel Local Wildlife Site systems, one at county and one at district level, is probably unrealistic given the markedly diminished resources of local authorities, natural environment charities and Natural England over the past decade. The Wildlife Trust for Lancashire, Manchester & North Merseyside continues to support the county system of Local Wildlife Sites (known historically as "Biological Heritage Sites") as best we may, out of core charitable resources, but we have never had sufficient core resource to support West Lancashire's own Local Site system. We think it would be preferable to concentrate effort on the development and maintenance of a robust and evidence-based ecological network based on regularly updated knowledge of the quality and distribution of Habitats and Species of Principal Importance in Lancashire as a whole; and in adjacent areas of neighbouring counties and city regions; with county-level Local Wildlife Sites, and national and international (some currently EU) nature conservation designations identifying key hubs and nodes of that network. The West Lancashire district-level local wildlife site system includes selection criteria based around public accessibility to and enjoyment by local people. That is more a "green infrastructure" selection criterion than one for an ecological network. Your authority may wish to consider that (people-focussed) ecosystem service as a criterion in identifying a green infrastructure network for the district (or a grouping of districts) and developing an associated green infrastructure policy.</p>	<p>Comments noted. West Lancs Borough Council agree that the parallel Local Wildlife systems are unrealistic to manage. Comments on Green Infrastructure noted. The council promotes GI through the GI and Cycling SPD and will have an associated detailed GI policy within the Local Plan; consideration can be given to a criterion on accessibility.</p>
46	<p>Option 2. because this will lead to a much more 'joined up' approach by providing connectivity for wildlife across the borough and will assist in developing awareness by a wider number of residents. There is a misconception that there is absolute protection for Conservation sites which sometimes can be difficult to enforce. By developing greater awareness and by placing former Nature Conservation Sites as link 'oasis' biodiversity sources, we can achieve a greater range of biodiversity across the borough. Ecological Network policy should be framed so as to give a more effective and robust level of environmental protection across the borough.</p>	<p>Comments noted. It is agreed that increasing biodiversity across the Borough is a laudable goal.</p>
48	<p>Option 2 should be adopted. Designating sites on an ecological network approach would be much better for the future given this plan will run to 2050 and there are going to be climatic, social and economic pressures and changes that will occur. Given fiscal constraints it would be better to focus on changing to the new system rather than putting work into updating the old system.</p>	<p>Comments noted; it is agreed that there are most likely to be changes to ecology and nature sites over coming years / decades.</p>
61	<p>From the descriptions in the paper, Option 1 seems the more robust to</p>	<p>Comments noted.</p>

ID	Representor Comments	Council Response
	protect the environment and is therefore preferable to option 2. Option 1 should preserve existing appropriate habitats and enable connectivity of habitats to enable species and habitats to both survive and thrive in changing conditions.	Connectivity of habitats is a key element of Option 2.
64	No comment.	Noted.
69	1 - continue	Noted.
72	status quo is ok.	Comments noted.
77	Should retain and encourage more projects similar to above.	Comments noted.
78	Monitor and encourage further sites for natural habitat - enlarge original. Our great west lincs area is attracting many visitors for walking and recreation - so helping the local economy.	Comments noted.
82	The Ecological Network seems like a good idea, as long as it continues to protect existing Nature Conservation Sites	Comments noted.
85	continuation of current Local Nature Conservation sites designation which need review and re-assessment .	Comments noted.
87	Burscough Parish Council supports Option 2 – removing the local nature conservation sites designation from the local plan.	Comments noted. The Ecological Network approach will still designate nature conservation assets accordingly.
96	AIUH make no specific comment in these respects.	Noted.
97	St. Modwen make no specific comment in these respects.	Noted.
99	No comment.	Noted.

Question 23: Should West Lancashire Borough Council designate sites for the provision of Renewable Energy? Which policy option for the provision of Renewable Energy do you think is the most appropriate for West Lancashire? Why?

ID	Representor Comments	Council Response
1	Option 1 solar farms get my backing not unsightly like turbines	Comments noted.
2	Option 1 solar farms less obtrusive to people	Comments noted.
9	Option 1	Noted.
14	option 1, planning and organisation is needed, they can be very ugly things. - if we can, encourage shale gas industry, this is a free new local source of wealth and employment.	Comments noted. LCC deal with minerals and waste and this remit covers shale gas; fracking is outside the remit of the Local Plan Review.
16	<p>As an environmental scientist I was impressed to learn about the Council's initiation of a broad Local Plan. The issues I find compelling centre on population (strongly linked to global warming and pollution) and energy production. I believe that these issues need to be introduced now into school and further education curricula along with dietary advice in order to educate the next generation about the problems they are facing and the means of tackling them. As a start, every attempt to cut population growth should be encouraged through education. To offset the predicted shortage of younger workers and the increasing use of robots to perform non-innovative tasks, older people volunteering to work longer should be offered re-training programmes.</p> <p>The ultimate sustainable source of energy is solar and, although the efficiency of solar cells is increasing, more investment in this field is needed. For immediate application, extensive use should be made of arrays of solar panels raised on stilts and placed so that the land beneath them could still be used for grazing and crop production. The productivity of such land might well be improved through (for example) temperature increases. New housing should be roofed with devices to generate power. Solar power could presently compliment wind-generated power and (through, for example, the use of geostationary satellites collecting infrared and transmitting microwave energy to ground stations) solar might eventually supersede wind generation. -</p>	<p>Comments noted.</p> <p>Education and influencing population growth, whilst linked to issues that the Local Plan is seeking to tackle, are in themselves beyond the remit of the Plan.</p> <p>The Council intend to investigate the potential for renewable energy through a Renewable Energy Study.</p>
18	no comment	-
19	Option 2 - Renewables are absolutely key to our sustainability so by keeping the options open re siting market forces are more able to steer where projects may be planned. In addition I would like tidal power and groundsource heat pumps to be included in this definition of renewables.	<p>Comments noted.</p> <p>The Council intend to investigate renewable energy through a Renewable Energy Study. Tidal power is acknowledged as a RE source, although the potential for its implementation in West Lancashire is limited.</p>
20	Option 2. Case by case basis seems the best way forward and has proved successful during this current Local Plan period in allowing local residents to have their say.	Comments noted.
23	Option 2. A case by case approach will allow greatest flexibility	Comments noted.
24	West Lancs is pitifully short of renewable energy generators. Go for Option 2 as, if we adopt the 2050 plan, more and more new technologies will appear and may not be appropriate for previously designated sites.	Comments noted.
26	Yes designate - but beware wind farms have a negative impact on sport - cricket, rugby and sailing to mention 3.	Comments noted. The Council intend to undertake a Renewable Energy Study which will identify possible areas for renewable energy.

ID	Representor Comments	Council Response
28	Option 2 but with the proviso that much more is done to encourage solar panels and wind turbines in existing industrial areas.	Comments noted. The Council intends to undertake a Renewable Energy Study which will identify possible areas for renewable energy.
30	Option 2 Encouragement should be given to the use of ground source heat pumps and design of all building types, particularly large warehouses, to maximise potential for use of solar energy. Ground mounted solar panels should be avoided.	Comments noted. It is accepted there are different views as to which types of renewable energy are best / acceptable.
31	I am strongly in favour of renewable energy. Please be bold on this one! Definitely designate sites (Option 1) whilst I know wind generation has its issues, solar has few. The most reliable would be tide related.	Comments noted. The Council intends to undertake a Renewable Energy Study which will identify possible areas for renewable energy. Potential for tide related energy in West Lancashire is limited.
32	Option 1 is essential Solar arrays can be erected at relatively low levels not impacting on views, they do not prevent livestock from grazing, nor do they impact overly on existing flora and fauna. What's more they are easily dismantled. Wind turbines can be problematic due to visual impact and noise issues however I have no issues with them myself, other than the intermittent nature of the supply. Tidal power is reliable twice a day tide comes in tide goes out.	Comments noted. The Council intends to undertake a Renewable Energy Study which will identify possible areas for renewable energy.
34	In terms of the options for Policy 2 we would question that if sites are not designated for potential renewable energy then would the policy result in successful take up over the lifetime of the plan. In this case how would the Policy help meet Objective 4 of the Local Plan. This Policy may need to be a combination of Options 1 and 2 to steer development to the right locations. If specific sites are allocated then consideration may need to be given to suitable mitigation for certain sites depending on site specific constraints.	Comments noted, including on the need for a combination of policies. The Council intends to undertake a Renewable Energy Study which will identify possible areas for renewable energy.
36	Renewables - many West Lancs residents are anti-fracking, and against wind turbines, so the obvious way forward is solar. We support solar, and feel most residents would do. However, we support solar in the correct setting, that being on the roofs of factories, businesses, houses and even on brown field sites. We do not support solar on greenbelt land, and especially not grade 1 & 2 agricultural land that should be used for food production...these should be protected from such developments.	Comments noted, including comments on solar farms. The Council intends to undertake a Renewable Energy Study which will identify possible areas for renewable energy. Whilst we understand residents' concerns over fracking this matter is under the remit of Lancashire County Council.
39	Response A : Option 1 - Comment : Option 1 is the only option which is more certain to deliver renewable energy sites within the planning process. - Option 1. Designate specific areas for wind, solar and other renewable energy sites subject to each technology.	Comments noted. The Council intends to undertake a Renewable Energy Study which will identify possible areas for renewable energy.
42	Identifying broad areas where specific types of renewable energy technology developments are preferred would be useful; particularly in the case of wind turbine arrays, given their potential to impact negatively on the special features (notably, overwintering wildfowl populations) of the Special Protection Areas (SPA) within and surrounding West Lancashire; most particularly Martin Mere SPA, Ribble & Alt Estuaries SPA, Mersey Estuary SPA and Wirral North Foreshore & Mersey Narrows SPA. It would also be useful to identify areas of mineral peat where release of locked carbon from the soil as a result of wind turbine array development could exceed the savings of carbon generated by the development; though this is compounded by carbon release through agricultural drainage and ploughing - which are, of course, normally outside the remit of the planning system. A regional guide to both potential constraints was produced quite sometime ago by ourselves and the RSPB during the period of regional planning: https://www.rspb.org.uk/our-work/our-positions-and-campaigns/positions/planning/spatial_planning_guides.aspx but the	Comments on wind farms noted, including in relation to peat and birds. The Council intends to undertake a Renewable Energy Study which will identify possible areas for renewable energy.

ID	Representor Comments	Council Response
	<p>distribution of wildfowl, in particular, changes somewhat over time. - - As you'll be aware: - - "Department for Communities and Local Government (DCLG) Written Statement on Wind Energy (June 2015) - The June 2015 Ministerial Statement on Wind Energy states; "when determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if: - • the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and - • following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing." . - - Assuming that statement still stands after the general election, that will also need to be factored into policy development on wind energy. - - In the case of solar farm developments, impacts on the district's ecological network would be related to scale as well as location. One might anticipate that very large reflective surfaces on open fields might significantly confuse large flocks of overwintering migratory wildfowl; but we are unfamiliar with the latest research, other than a negative finding in "Evidence review of the impact of solar farms on birds, bats and general ecology (NEER012)", 1st edition - 9th March 2017, University of Manchester for Natural England. Given the proximity of the SPAs referred to above, we suggest that you seek advice from Natural England. It should have more ready access to the latest relevant research. - - The issue of large land take for both solar arrays and wind turbine arrays will also have potential to markedly reduce feeding and loafing areas for overwintering birds that are special features of the SPAs; but that would apply to any very large development that was inappropriately located. - - Ground-source heat-pumps have no significant differences in potential impacts on ecological networks from most other development, so far as we are aware, and should, in consequence, be considered on a case-by-case basis. Similar considerations apply to hydro-electric energy generation: given the predominantly low-lying nature of the Borough, we presume any applications for development featuring such technology would be likely to be small-scale in any case.</p>	
45	<p>One cannot meet the local community energy needs with renewable energy unless we conserve energy in the first place. New buildings should conserve energy as top priority. Energy conservation and waste prevention are required to help remove threats from Fracking and avoid more landfill sites. High levels of insulation, ground source heat and biomass should be promoted through the design of buildings. Solar hot water on houses is far more effective than solar electricity panels and needs support. Building roofs need to be orientated to take maximum advantage of solar power (not necessarily the whole building).</p>	<p>Comments noted. It is agreed that conservation of energy is important. Standards of insulation, etc. are covered by Building Regulations. Fracking comes under the remit of Lancashire County Council. The Council intends to undertake a Renewable Energy Study which will identify possible areas for renewable energy.</p>
46	<p>Option 1. because West Lancs has been identified as having some of the most ideal locations for onshore wind energy as well as large areas of lesser grade agricultural land suitable for solar farms. The current attitude of Government towards onshore wind is illogical and will not prevail very far into the future as the economics of renewable energy outperform old fossil fuel based energy sources even the extreme energy developments such as shale gas which relies upon heavy subsidy and tax exemptions. Lower grade agricultural land can be greatly improved by utilising a dual/multi use Solar Farm- wildflower meadow combination, thus increasing biodiversity and generating significant amounts of energy for the borough. Therefore zoning for both types of energy should be included in the Local Plan in order to 'future-proof' the Plan and to provide an amount of predictability and assurance to the wider public who sometimes are alarmed at the prospect of a proliferation of such schemes when there is a lack of specific provision. There should also be some micro-hydro/tidal energy generation policy provision for when further Research and Design reaches the stage where schemes can come forward.</p>	<p>Comments on wind and solar energy noted. The Council intend to investigate renewable energy through a Renewable Energy Study which will identify possible areas suitable for renewable energy. Changing economies over the lifetime of the Plan should be taken into account.</p>

ID	Representor Comments	Council Response
47	I would like to see WLBC getting into the renewable energy business themselves. Like council housing, but this time a council-run or municipal energy company.	Comments noted. The Council intends to investigate renewable energy through a Renewable Energy Study which will identify possible suitable areas for renewable energy.
48	West Lancashire needs to be zoned as a renewables target area by central government and WLBC should lobby government for this. At present West Lancashire is not meeting it's targets for renewable energy generation. Option 1 should be adopted as a priority and areas outside the designated areas considered under Option 2. The refusal of the Lower Alt Windfarm on policy and hence legal technicalities flies in the face of sustainable local energy production and it's fiscal benefits to the local community.	Comments noted. The Council intends to investigate renewable energy through a Renewable Energy Study which will identify possible suitable areas for renewable energy.
53	One cannot meet the local community energy needs with renewable energy unless we conserve energy in the first place.	Comments noted. It is agreed that energy conservation is important. This is largely outside the remit of the Local Plan and is linked more to Building Regulations.
61	I think Option one is more appropriate because it would provide clarity about the optimum siting for renewable energy sources taking into account potential environmental impacts and indicate where planning permission would most likely be granted for the appropriate schemes.	Comments noted. The Council intends to investigate renewable energy through a Renewable Energy Study which will identify possible suitable areas for renewable energy.
63	Move away from spraying dangerous glyphosate as a weedkiller. Glyphosate damages the body's healing mechanism, it ends up in water, in fish and is taken up by insects and birds. Look at white vinegar and salt alternatives. See google. Energy conservation and waste prevention are required to help remove threats from fracking and avoid extensions to landfill sites. High levels of insulation, ground source heat and biomass should be promoted through the design of buildings. Solar hot water on houses is useful as is solar stored in batteries. Buildings need to be south facing to take maximum advantage of solar power.	Comments on glyphosate noted, although this matter is outside the remit of the Local Plan Water and land pollution fall within the remit of the Environment Agency and Environmental Health.. The Council intends to investigate renewable energy through a Renewable Energy Study which will identify possible suitable areas for renewable energy. Whilst we understand residents' concerns over fracking this lies under the remit of Lancashire County Council.
64	No comment.	Noted.
68	One cannot meet the local community energy needs with renewable energy unless we conserve energy in the first place. New buildings should conserve energy as top priority. Energy conservation and waste prevention are required to help remove threats from Fracking and avoid more landfill sites. High levels of insulation, ground source heat and biomass should be promoted through the design of buildings. Solar hot water on houses is far more effective than solar electricity panels and needs support. Building roofs need to be orientated to take maximum advantage of solar power (not necessarily the whole building).	Comments noted. The Council intends to investigate renewable energy through a Renewable Energy Study which will identify possible suitable areas for renewable energy. It is agreed that energy conservation is an important factor; this is dealt with primarily through Building Regulations. Fracking lies under the remit of Lancashire County Council.
69	Yes, I support applying option 1, without excluding case-by-case consideration of other proposals. Alongside energy efficiency - reducing use, eliminating wastefulness - providing at least our share of the national need for renewable energy, where possible for local communities with their involvement, must be a top priority.	Comments noted. The Council intends to investigate renewable energy through a Renewable Energy Study which will identify possible suitable areas for renewable energy. It is agreed that reducing energy use is also important.
72	Designate specific areas.	Comments noted.
75	We welcome the inclusion of a policy for renewable energy. Consideration should be given to the Lancashire Climate Change Strategy 2009-2027 which sets out the long-term vision that Lancashire is working towards a low carbon and well adapted County during the lifetime of this local plan period.	Comments on Lancashire Climate Change Strategy noted. The Borough Council intends to investigate renewable energy through a Renewable Energy Study which will identify possible suitable areas for renewable energy.
77	WLBC should designate sites for renewable energy in the form of eg	Comments noted. The Council intends to

ID	Representor Comments	Council Response
	stipulate solar panels to be installed onto any new properties.	investigate renewable energy through a Renewable Energy Study which will identify possible suitable areas for renewable energy. Renewable energy requirements need to be considered within the whole area of viability.
78	In planning permission stipulate solar panels are installed on building regulations solar panels on top of all the large warehouse and industrial buildings saving fields.	Comments noted. The Council intends to investigate renewable energy through a Renewable Energy Study which will identify possible suitable areas for renewable energy. Renewable energy requirements need to be considered within the whole area of viability.
82	Option 1 seems like a good idea - designate areas like the Lower Alt that are ideal for wind to aid the planning of wind farms in those areas.	Comments noted.
83	<p>The environment rather than fracking the countryside there should be deep drilling to provide ground source or geothermal energy eg to heat the baths at park pool and nye bevan and to provide district heating for the towns. Wind turbines should be allowed onshore eg along the western facing hills such as Ashurst Beacon / parbold hill or alongside the M58 where the traffic noise will mean the turbines cannot be heard.</p> <p>The roofs of skelmersdale should have solar panels on them all and with deep ground source heating for the concourse and the library etc the town could become a green (because of the green spaces) & renewable township (plus electric railways to Manchester and Liverpool)</p> <p>I am not sure if it would work but maybe there should be a tidal barrage from Southport/banks to lytham st annes with a cycle path and footpath along the top. If this isnt going to work then one from Fleetwood to Barrow across morcambe bay?</p>	<p>Comments on ideas for 'Green Skelmersdale' noted. The Council intends to investigate renewable energy generation through a Renewable Energy Study which will identify possible areas for renewable energy. Whilst we understand residents' concerns over fracking this comes under the remit of Lancashire County Council.</p> <p>Comments on barrages noted.</p>
84	<p>Persimmon Homes feels strongly that the provision of specific policies relating to sustainable development stand contrary to the Government Housing Standards Review that sought to make the energy requirements from a development a matter for building regulations. Therefore - additional onerous requirements are not compliant with this. - Any such policies (including for example electric charging points) should be included within the - plan wide viability assessment. Persimmon Homes does not support the provision of charging - points on all new development. There is no evidence that the uptake and access to electric - vehicles will require such provision in the foreseeable future.</p>	<p>Comments noted. Any sound Local Plan policy on energy will comply with national policy and guidance.</p>
85	Take advantage of solar panel opportunities as they arise but in particular encourage solar tile use for new housing sites.	Comments noted.
87	<p>Burscough Parish Council supports a strong policy on Renewable Energy. - Burscough Parish Council supports Option 1 in part: designate specific areas for the production of med scale wind power, but solar power should be treated seperately. Please note that Burscough Renewable Energy CIC commissioned UCLAN to prepare a very excellent report into wind power in Burscough and this is available on the Parish Council's website. It is of use to any business considering wind power in Burscough and covers most industrial areas.</p> <p>With regard to solar power, we note that there was little objection to the recent application for a solar farm at Pippin Street so long as the site was properly screened and remained under some form of agriculture (such as grazing land). It is important that, within the local plan, various forms of renewable energy are dealt with seperately, as the impact on local residents can be very different. solar power should be supported in the local plan subject to screening and continued sustainable use of land.</p>	<p>Comments on solar power and wind power (including the Burscough-specific study) noted.</p> <p>The Council intends to investigate renewable energy generation through a Renewable Energy Study which will identify possible areas for renewable energy.</p>
90	One cannot meet the local community energy needs with renewable	Comments noted. It is agreed that energy

ID	Representor Comments	Council Response
	<p>energy unless we conserve energy in the first place. New buildings should conserve energy as top priority. Energy conservation and waste prevention are required to help remove threats from Fracking and avoid more landfill sites. - High levels of insulation, ground source heat and biomass should be promoted through the design of buildings. Solar hot water on houses is far more effective than solar electricity panels and needs support. Building roofs need to be orientated to take maximum advantage of solar power. -</p>	<p>conservation is important. The Council intends to investigate renewable energy generation through a Renewable Energy Study which will identify possible areas for renewable energy. Whilst we understand residents' concerns over fracking this lies under the remit of Lancashire County Council.</p>
96	<p>AIUH make no specific comment in these respects.</p>	<p>Noted.</p>
97	<p>St. Modwen make no specific comment in these respects.</p>	<p>Noted.</p>
99	<p>No comment.</p>	<p>Noted.</p>

Question 24: Which policy option for Sustainable Design and Construction do you think is the most appropriate for West Lancashire? Why? Would a combination of options help to assist sustainable development? What kind of measures could we require of new development?

ID	Representor Comments	Council Response
1	Energy is key when building new homes solar tiles and underground heating is the future	Comments noted.
2	All new properties should have the latest heating systems	Comments noted.
9	Developers should be compelled to invest in sustainable design	The Council encourages sustainable design and construction; this is also covered by Building Regulations.
12	Solar energy	Comments noted.
14	option 1	Noted.
18	no comment	-
19	I believe every new build and extension/rebuild should have a requirement to incorporate renewables to the maximum. This would include a requirement for ground source heat pumps - solar water and electric and integral part of the roofing, electric vehicle charging points and recycling points at source. Also encouraging sustainability in garden schemes that promote biodiversity alongside homegrown produce areas either individual areas or in group areas. I believe that parking capacity should be limited and precedence given to the green infrastructure of the area - helping to improve the mental health and physical health of the new residents.	Comments noted. The Council agrees that renewable energy opportunities should be maximised. The Council encourages sustainable design and construction; this is also covered by Building Regulations. There are limits, however, to what can be required through planning policy, as there is an overall requirement for schemes to be viable. It is agreed that Green Infrastructure has an important role to fulfil.
20	The first option - Require specific sustainable design and construction features or measures to be incorporated into new developments. This appears to be the most suitable.	The Council encourages sustainable design and construction; this is also covered by Building Regulations.
23	All new developments should require sustainable construction	The Council encourages sustainable design and construction; this is also covered by Building Regulations.
24	All new builds should incorporate sustainability and I agree with the statement in the first paragraph. A mix of the first option and the third option would be best.	Comments noted.
26	I think the first and third options are appropriate - whether or not they can be combined depends on the circumstances.	Comments noted.
28	Options 1 and 3 above to require sustainable design and construction as well as the development of the energy fund to improve existing stock.	The Council encourages sustainable design and construction; this is also covered by Building Regulations.
30	Design requirements should be limited to those in the Building Regulations but I would welcome emphasis on orientation to maximise energy efficiency. I am opposed to the concept of a Community Energy Fund. Those who pay may not be those who benefit. The Community Infrastructure levy is not being wisely spent.	The Council encourages sustainable design and construction; this is also covered by Building Regulations. Comments on Community Energy Fund noted. CIL is spent within the Borough following consultation with Members, Parish Councils and the public. This matter is outside the remit of the Local Plan.
31	Require specific sustainable design and construction features or measures to be incorporated into new developments. Insist that solar panels are installed on all new build dwellings.	Comments noted. The Council encourages sustainable design and construction; this is also covered by Building Regulations.

ID	Representor Comments	Council Response
32	<p>The Council needs to fight for all developers in our borough to provide sustainable builds. The Council needs to be pushing developers to ensure that insulation values are at the highest level, all new builds must be built with solar capture roofing, where possible grey water capture should be a requirement. The developers will cry it is uneconomic for them to do this, however if it is borough wide, creating a level playing field we may get developers with better ethical credentials wanting to build for us. West Lancashire may become a Borough others want to emulate.</p>	<p>Comments noted, West Lancashire becoming a Borough others would want to emulate is a laudable aim. The Council encourages sustainable design and construction; this is also covered by Building Regulations.</p>
34	<p>This policy could also incorporate the inclusion of Sustainable Drainage Systems for future development. We agree that Option 2 provides little certainty of adoption for such techniques. We therefore recommend a combination of options 1 and 3 which should result in better implementation.</p> <p>Pollution prevention could also be included within this section in terms of recommending Best Practice Infrastructure to help protect/improve water quality. For example within Industrial sites the ability to isolate drainage systems if a pollution event occurs or within residential areas ensuring sealed surface water downpipes so that washing machines cannot be plumbed into surface water drainage can both help protect water quality for both ground and surface waters.</p>	<p>Comments on Options and on pollution prevention noted. A policy regarding drainage and flooding, etc. will form part of the new Local Plan. It will be important to be clear about what comes under planning policy and what comes under Building Regulations.</p>
35	<p>It is recognised by our clients that good design is inherent to sustainable development. However, of the options proposed in response to Environmental Policy Issue 3, it is considered that Option 2 is the most appropriate.</p> <p>Option 2 would ensure that flexibility remained for the inclusion of sustainable features by developers, and would not, as a result of imposing restrictive design features hinder development coming forward due to viability issues. The appearance and design of development can be controlled through other measures and best practice and the need to provide sustainable developments is covered through national policy and guidance, including Part L of the Building Regulations. Therefore, it is unnecessary for WLBC to place further restrictive requirements on developments within the Borough.</p> <p>Options 1 and 3 are considered restraining and may prevent developments coming forward within the Borough to the detriment of WLBC's needs and requirements.</p>	<p>Comments on options noted. Whilst it is accepted that some sustainable design fetures are covered by Building Regulations, it is considered that backing these up, or 'enhancing' the requirements by means of planning policy, will help achieve more in terms of sustainability. Viability will be taken into account when preparing Local Plan policies.</p>
39	<p>Option 1. Requirement for sustainable design and construction measures to be incorporated into new developments. - Response A: Option 1</p>	<p>Comments noted.</p>
42	<p>A combination of the first and third would be most appropriate as it would address opportunities for significant restoration of biodiversity whilst also mitigating climate change.</p>	<p>Comments noted.</p>
46	<p>Option1. because we need to 'hard-wire' design requirements into future builds, simply requiring developer contributions to a Community Energy Fund would not help drive the wider implementation of measures which will achieve a significant move forwards. District Energy Schemes should be encouraged and renewable energy options should be encouraged especially on larger development sites such as Ground source heat pumps and Air source heat pumps. Solar should be strongly encouraged not just on residential properties but also on all industrial units, offices and warehouses as a matter of good practise.</p>	<p>Comments noted, including comments on advocating renewable energy features on uses other than housing.</p>
47	<p>Both of</p> <ul style="list-style-type: none"> - Require specific sustainable design and construction features or measures to be incorporated into new developments. And - Require new development to contribute financially to a Community Energy Fund*. 	<p>Comments noted.</p>
48	<p>This should be a major priority. Definitely require specific sustainable design and construction features irrespective of their initial cost. The added value to the properties and their lower running costs will outweigh the</p>	<p>Comments noted. It would be expected that sustainable design features and lower running costs should add to a property's</p>

ID	Representor Comments	Council Response
	<p>initial price. Secondly do develop a Community Energy Fund help fund the improvement in energy efficiency of older housing stock.</p>	<p>value; there is little evidence of this at present, but it is expected that evidence will become stronger with time.</p>
50	<p>It is our opinion that Option 1 should be supported - this option ensures that sustainable design features are included within every development and supports the Council's Vision for a better, and healthier quality of life (as presented in the Strategic Development Options - paper). It would also support the draft Objectives 1-4: Sustainable Communities; A Healthy Population; A High Quality Built Environment; and Addressing Climate Change.</p> <p>While Option 2 could make development in the Borough more attractive in the short-term through a reduction in additional financial requirements for developers, allowing poor design will ultimately have long-term implications for sustainable travel, and potentially impact on the overall attractiveness of the area.</p> <p>Key Points:</p> <p>☒ There are very few policy topics presented in the Environmental Policy Options Paper that have direct impacts on the SRN. Environmental Policy Option 3 is unlikely to have significant direct impacts, but Highways England would always look to support and encourage policy options that ensure design promotes and facilitates sustainable modes of travel as much as possible. Supporting Option 1 may help ensure new development is designed in such a way that these principles are upheld.</p>	<p>Comments noted, including links to the Vision and Objectives, and implications for the strategic road network and sustainable travel. It is agreed that long term benefits should be a weightier consideration than short-term gain.</p>
56	<p>Electric Vehicle Charging Points</p> <p>The Environmental Policy Options Paper [EPO Paper] raises the possibility of introducing Electric Vehicle [EV] charging points requirements [§4.5] in policy. Whilst Taylor Wimpey does not necessarily object to EV charging points, it notes that the Framework does not require EV charging points but rather simply encourages them "where practical" [§35]. If the Local Plan sought to impose Electric Vehicle [EV] charging points requirements on developers, this approach would need to be tested in terms of viability.</p> <p>Sustainable energy standards/requirements</p> <p>Paragraph 4.5 of the EPO Paper states: "where it is justified and does not make development unviable, the Local Plan can include policies which place a requirement for a particular sustainable feature or measure on certain new developments to help improve the environmental performance of buildings." [Lichfields emphasis]</p> <p>Taylor Wimpey acknowledges the qualifying effect of this statement and therefore supports Option 2 set out at §4.6, which would not introduce make specific policy requirements.</p> <p>As a result of changes to national policy and advice, largely following the Government's housing standards Review, energy requirements from a development are matter solely for Part L of the Building Regulations and the Local Plan should not impose additional requirements on developers.</p> <p>Accessibility Standards</p> <p>Taylor Wimpey acknowledges the need to provide accessible accommodation as set out in the Social Policy Options Paper [SPO Paper]. However, given the Government's intention to minimise the use of local standards (through the Housing Standards Review), Taylor Wimpey would not support the introduction of any additional accessibility standards introduced on a 'blanket' policy basis as this would lead to viability issues on developments.</p>	<p>Comments on options noted.</p> <p>As mentioned by the respondent, Local Plan policies will be viability tested as part of the Plan's preparation.</p> <p>The Housing Standards Review, and the remit of Building Regulations are acknowledged.</p>
58	<p>The HBF supports option 2 which would not make specific policy requirements in this regard. The Council correctly notes at paragraph 4.5 of the Environmental Policy Options Paper that energy requirements have been removed by changes to national policy and advice in recent years. This principally follows on from the Government's Housing Standards Review. The review essentially made the energy requirements from a development a matter solely for Part L of the Building Regulations. Therefore Local Authorities should not be seeking to place such requirements upon developers.</p>	<p>Comments noted. The Housing Standards Review, and the remit of Building Regulations are acknowledged. Local Plan policies will be viability tested as part of the Local Plan's preparation.</p>

ID	Representor Comments	Council Response
	The options paper also refers to Electric Vehicle Charging Points. If the Council sought to make this a requirement this would need to be viability tested. The NPPF encourages rather than requires such charging points, paragraph 35 is clear that they should only be provided where practical.	
61	Requiring specific sustainable design and construction features be incorporated into development is the only sure way of ensuring this policy is delivered. A financial contribution to a Community Energy fund alongside policy requirements would be the optimum combination. A financial contribution should not be the 'easy option' for the developer to avoid energy saving being incorporated in the design. Suggestions include solar roof tiles on houses.	Comments on options and the specific example of solar tiles noted. The Council encourages sustainable design and construction; this is also covered by Building Regulations.
63	Housing density needs to allow space for planting trees and vegetation for wildlife. Protect green belt.	Comments noted.
64	It is our Clients' view that specific policy requirements should not be set to ensure that building requirements should not be overly onerous on developers to ensure the viability of developments are not compromised. i.e. dwellings should be constructed in accordance with the latest Building Standards, rather than seeking to apply Lifetime Home Standards.	Comments noted. Local Plan policies will be viability tested as part of the Plan preparation. Lifetime Homes Standards have been superseded by Building Regulation M4(2).
69	1. Require carbon-reducing/neutralising features in new build and retrofit these to existing properties	Comments noted. It is unlikely that planning policies can require retrofitting, but features could be required in new build properties.
70	As this paper correctly identifies, it has been the policy of central government over recent years to remove matters relating to sustainable design and construction from local plans and instead have these addressed through the building regulations process. This has been confirmed through the Written Ministerial Statement of 25th March 2015, along with the NPPF and NPPG which clearly explains that local planning authorities should not be setting additional standards such as requirements for renewable energy or low carbon technologies. As such, the Commissioners would not expect to see prescriptive policies within the Local Plan Review. As a result of this the Commissioners believe that of the options presented in the paper, Option 2 would represent the only sound choice to pursue, although the explanation given within the paper is not accurate as the necessary standards would be picked up by building regulations. We note a third option is discussed which would involve financial contributions from developers to a Community Energy Fund. The Commissioners would object to such a move as it would not pass the statutory tests outlined in CIL Regulation 122; specifically that planning obligations - should be necessary to make the development acceptable in planning terms, as it is clear that such matters now sit outside the planning system. There would also be an issue of limited pooling of contributions in respect of such an obligation and so in practical terms it is also likely to be unfeasible.	Comments on the Housing Standards Review and the role of Building Regulations noted; also comments on options, and on the Community energy Fund and its relationship to CIL noted.
72	don't restrict growth by imposing what will be construed as a development tax - encourage the best design for individual sites using planning conditions. That has the best chance of producing the best spaces for people to live in and enjoy.	Comments noted.
75	We welcome the inclusion of a policy for sustainable design and construction. More information is required on how the design and construction features or measures will be defined, including any reference to particular standards, and whether the requirements would go beyond existing Building Regulations.	Comments noted. More information will be provided when the draft policy is drawn up and viability-assessed.
78	Appropriate to the area to blend in especially where very old buildings exist. New designs encouraged in the new larger developments.	Comments noted.
82	Require specific sustainable design and construction features or measures	Comments noted. The Council encourages

ID	Representor Comments	Council Response
	to be incorporated into new developments. Solar panels, ground source heat and efficient insulation needs to be encouraged in new builds	sustainable design and construction; this is also covered by Building Regulations.
86	<p>We welcome the opportunity to engage with the West Lancashire Local Plan Review. We are pleased to see that environmental policies were highlighted in your scoping consultation feedback report and we would reiterate how important it is for local plans to protect and enhance the environment. A potentially valuable tool to delivering a wide range of ecosystem services would be to strengthen your local plan’s priorities around sustainable drainage system (SuDS) delivery.</p> <p>WWT is a world-leading charity in the conservation of wetlands and the wildlife that inhabits them. We operate nine wetland centres across the UK, attracting over one million visitors each year, and have over 200,000 members worldwide. As you will know, one of these centres – the internationally important, Martin Mere – is located in West Lancashire.</p> <p>WWT is also a passionate champion of SuDS. SuDS seek to manage rainfall in the similar way to natural processes. They replicate what happens in nature using landscape to control the flow and volume and soil and plants act to filter pollution along the way. Examples of SuDS include rain gardens, ponds and wetlands. If SuDS are designed and managed appropriately, then they can be used to help address many problems faced by local authorities through the delivery of multiple benefits. For example, they can help reduce flood risk, improve water quality, reach biodiversity targets, improve health and well-being, provide safe areas for outdoor learning, and more. Furthermore, SuDS can be installed affordably into nearly all kinds of new development – as well as retrofitted into existing development – if effective planning is in place.</p> <p>The strength of SuDS policy in local plans is an important factor affecting the number of SuDS schemes being built. The current West Lancashire local plan has a number of positive statements around SuDS including paragraph 5.24 which states that SuDS must be integrated into all new developments where technically feasible and Policy EN1 which requires all development to incorporate SuDS in order to be resilient to climate change. However, there are a number of opportunities to promote SuDS more effectively within the plan in order for it to provide a robust line on delivering SuDS and clarity to planning officers and developers.</p> <ul style="list-style-type: none"> • A stand-alone policy on SuDS in the updated Local Plan would underline their importance and allow you to present clear and detailed SuDS guidance. Such a policy should: <ul style="list-style-type: none"> o State that SuDS be incorporated into all types and sizes of development - there are very few potential developments that would not be able to accommodate some form of SuDS scheme. The Richmond Council Local Plan, for example, simply states on page 74 that “the Council will require the use of SuDS in all development proposals”. o Support the delivery of multiple benefits through SuDS beyond merely reducing flood risk. Potential benefits include, but are not limited to, improved water quality, enhanced biodiversity and better health and well-being for local residents. The Dumfries and Galloway Local Plan goes part way towards achieving this on page 89 by stating that SuDS should “contribute positively to the biodiversity and general amenity of the area of the proposal”. o Require arrangements to be made for the long-term maintenance of any schemes proposed. Most SuDS require little ongoing maintenance but it is important to allocate responsibility at an early stage. The South Downs Local Plan, for instance, states on page 247 that proposals must “demonstrate that management and maintenance arrangements for the lifetime operation of the scheme are in place”. • A consistently strong message on SuDS across all relevant policies would leave the reader in no doubt about how seriously SuDS are considered in West Lancashire. <p>o SuDS are featured in Policy GN3 of your current Local Plan on Criteria for Sustainable Development but the language used could be stronger. Rather than just asking developers to “demonstrate that SuDS have been</p>	<p>Comments noted, including comments on SuDS and SuDS policy - this can be explored as the next stage of the Local Plan Review is prepared.</p> <p>The international importance of Martin Mere as a nature conservation area is acknowledged.</p>

ID	Representor Comments	Council Response
	<p>explored”, we suggest the plan states that SuDS be included or robust justification be given for not doing so.</p> <ul style="list-style-type: none"> o A similar approach could have been taken for Policy EC4 on Edge Hill University which merely “promotes” the use of SuDS. o SuDS are not mentioned in some relevant policies of the current Local Plan despite good opportunities to do so. For example, Policy SP3 on Yew Tree Farm states that the site “should deliver...measures to address surface water drainage issues” but does not suggest SuDS as a potential solution. <ul style="list-style-type: none"> • Including the definition of sustainable drainage as given in Schedule 3 of the Flood and Water Management Act 2010 would clarify exactly what a SuDS scheme is expected to achieve. • SuDS should be raised early in the updated Local Plan and considered often throughout. There is also merit in providing a certain amount of background information on SuDS to help guide planning officers in their decision making. This should include the rationale behind using SuDS in development, a description of the different types of SuDS that could be used and links to further information on SuDS such as CIRIA’s SuDS manual and RSPB/WWT’s SuDS guide. <p>Delivering more SuDS in West Lancashire would significantly benefit local communities. It is clear from the spatial portrait in the current Local Plan that flooding is a major issue in many areas of the Borough. SuDS would help reduce the risk of surface water flooding in these areas immediately and mitigate the likely impacts of climate change going forward. Installing more SuDS would also help to address other key issues in the Borough such as the pressure on waste water treatment facilities and the need for more green infrastructure.</p>	
87	<p>Burscough Parish Council supports a robust policy on sustainable design, that ensures that future energy needs are reduced. This may include solar panels on roofs and low energy heating systems along with technologically advanced methods of building.</p>	<p>Comments noted. The Council encourages sustainable design and construction; this is also covered by Building Regulations.</p>
92	<p>Sustainable housing does not just mean an energy efficient build, but it must also encompass housing design and how the resident will live in the house and access the necessary services. Good building design, location and build quality are all very important in creating housing that can create long term sustainable communities.</p> <p>Foster a balanced, integrated and sustainable approach to development in order to deliver homes (in a variety of sizes and tenures to meet all needs including affordable housing), jobs and better opportunities for all, whilst protecting and enhancing the natural and historic environment, key social assets and public amenities as well conserving the countryside and open spaces and ensuring high quality design for development.</p> <p>Tackle climate change, decentralise energy infrastructure, promote energy efficiency & renewable energy and move towards zero carbon development. Ensure that development is based around the need for access by all forms of transport, management of parking in new development and expectation that developers should contribute to cost of public transport access in areas that are not well served by existing public transport services.</p>	<p>Comments noted. It is agreed that to achieve sustainable communities, one needs to look beyond energy efficiency, etc. of homes, and to consider such things as lifestyles and travel patterns.</p>
95	<p>4.18 In respect of Sustainable Design and Construction, WLBC has noted that national planning policy implemented by the Government has removed energy requirements, such as the Code for Sustainable Homes. Instead, energy efficiency is a matter which is managed by the Building Regulations. DWH does not therefore consider that the Local Plan Review should add additional policy requirements in this respect. Any policy requirements which WLBC does seek to take forward – such as the mooted requirement for a proportion of electric charging points – must be carefully viability tested alongside other policy aspirations such as affordable housing, to ensure that they do not compromise the delivery of new development.</p>	<p>Comments noted. The role of Building Regulations is acknowledged, and the Local Plan will be viability tested as part of its preparation.</p>

ID	Representor Comments	Council Response
96	<p>The Council should carefully consider the imposition of a blanket approach to the delivery of specific construction features or contribution to a Community Energy Fund, as these were not envisaged as part of the process wherein the Council arrived at its CIL Charging Schedule. The Council's adopted CIL Charging Schedule applies tariffs on a geographic basis recognizing the fundamental variances in terms of housing market conditions and viability across the borough. Should the Local Plan Review propose amendments to the development limit within this Spatial Area, the boundary in the CIL Charging Schedule should be amended to accord.</p> <p>If the Council were to decide on introducing new construction requirements or planning obligations then that should only be progressed in tandem with a review of the CIL Charging Schedule. We would also strongly encourage that the Council introduce a Discretionary Policy so that the planning benefits of any such obligations could be afforded weight relative to other planning benefits which could be prejudiced (by unintended consequence). An obvious example of such a situation would be where such an obligation could prejudice a scheme that would otherwise catalyse the active use of heritage assets so that they can be preserved or enhanced.</p>	<p>Comments noted. The role of Building Regulations is acknowledged, and the Local Plan will be viability tested as part of its preparation. This viability test will take account of CIL which is now in place. It is not agreed that new policies will necessitate a review of CIL, or CIL boundaries; rather new policies will need to account for the impact of CIL on overall viability.</p>
97	<p>The Council should carefully consider the imposition of a blanket approach to the delivery of specific construction features or contribution to a Community Energy Fund, as these were not envisaged as part of the process wherein the Council arrived at its CIL Charging Schedule. The Council's adopted CIL Charging Schedule applies tariffs on a geographic basis recognizing the fundamental variances in terms of housing market conditions and development viability across the borough.</p> <p>If the Council were to decide on introducing new construction requirements or planning obligations then that should only be progressed in tandem with a review of the CIL Charging Schedule. We would strongly encourage that the Council introduce a Discretionary Policy so that the planning benefits of any such obligations could be afforded weight relative to other planning benefits which could be prejudiced (by unintended consequence).</p>	<p>Comments noted. The role of Building Regulations is acknowledged, and the Local Plan will be viability tested as part of its preparation. This viability test will take account of CIL which is now in place. It is not agreed that new policies will necessitate a review of CIL, or CIL boundaries; rather new policies will need to account for the impact of CIL on overall viability.</p>
99	<p>It is our Clients' view that specific policy requirements should not be set to ensure that building requirements should not be overly onerous on developers to ensure the viability of developments are not compromised. i.e. dwellings should be constructed in accordance with the latest Building Standards, rather than seeking to apply Lifetime Home Standards.</p>	<p>Comments noted. The proposed new Local Plan policies will be viability tested as part of the Plan's preparation. The Council is aware that Lifetime Homes Standards have been superseded by Building Regulations (part M(4)).</p>

Question 25: Which policy option for creating Sustainable and Healthy Places do you think is the most appropriate for West Lancashire? Would it be appropriate to include more than one of the options in order to create healthy and accessible environments for all?

ID	Representor Comments	Council Response
1	Option 2 would be best	Comments noted.
9	Option 3 should be the priority- all the new build estates I have seen in the area recently have the houses packed in so tightly its ridiculous. They are in no way like a community.	Comments noted.
14	option 2....does the same as option 1...we are a relatively flat landscape ideal for cycling	Comments noted.
18	no comment	-
19	Options 2 and3 - are appropriate. Promoting cycling and walking infrastructure will increase physical and mental health and hence reduce our national medical costs as well as reducing our dependence on motor vehicles to move us around.	Comments noted.
20	Option 3: Require residential developments over a certain size to incorporate public open space and amenity green space. Also safe and secure childrens' play areas would be advantageous.	Comments noted.
21	Yes	
23	Option 3. Greenspace is a commodity for all.	Comments noted.
24	I think the three options should be combined to produce the most pleasant and health giving environment for the residents of West Lancashire	Comments noted.
26	Please see Sport England's Active Design: https://www.sportengland.org/facilities-planning/active-design/ Each options has pros and cons.	Comments noted.
28	All three options are required.	Comments noted.
30	Options 2 and 3 should be combined. They are not alternatives. Even if developments are designed to encourage active lifestyles there is no guarantee that the obese will take advantage of the features..	Comments noted. Whilst planners cannot 'control' people's behaviour, by facilitating places / layouts that make it easy to lead an active lifestyle, we can indirectly influence activity levels.
31	Option 1	Comments noted.
32	Surely the options answer themselves all three are essential for our communities health and well being.	Comments noted.
34	We support options 2 and 3 for requirements of open space and in particular the connectivity of green spaces as part of new development. This would not only bring health benefits but could also help create habitats for biodiversity and enable migratory networks which will in turn help species to adapt to climate change. Opportunities could also be sought for flood alleviation within such green spaces such as incorporating Sustainable Drainage Systems.	Comments noted. It is often the case that 'Green Infrastructure' has more than one benefit - in the case cited, health and biodiversity.
35	As is suggested within the document, it is not considered that each of the 3 options provided should be considered mutually exclusively. Instead, a combination of the proposed requirements should be considered for inclusion within the Local Plan Review, although the nature of their inclusion is a matter for consideration. The requirements identified within the consultation documents should not	Comments noted. Whilst it is noted that NJL Consulting recommends consideration of inclusion of such features on an informal site by site basis, this would be unlikely to meet the needs of West Lancashire over the plan period. By contrast, a policy sets out

ID	Representor Comments	Council Response
	be translated, during the Local Plan Review, into specific policies, or a single policy, which developments are required to meet. Instead, such features should be encouraged where possible and should be considered on their suitability for inclusion on a site-by-site basis, reflective of the needs of the development, the local area, existing provision and the capacity of the development to provide such features.	requirements / targets, derived from the evidence base.
39	Option 3. Requirements for residential developments over a certain size to incorporate public open space and amenity green space. ResponseA : Option 3 - Comment : However, all 3 options could be provided.	Comments noted. The Council is currently undertaking a open space assessment as part of its evidence base and this will inform WLBC on current / future need for open space.
42	All three options deliver green infrastructure offering services beneficial to the public good and likely to increase public access to and enjoyment of nature: it would be invidious to have to choose between them. If we must choose then Option 3 is the most closely aligned to our core charitable remit, assuming that said public open space and amenity greenspace would be designed and maintained in a way that also protects, maintains, enhances, expands and links the district's identified ecological networks. We recommend that it should be a requirement to seek ecological assessments of all significant developments, requiring designers to have regard to / retain existing habitat features, where practicable, demonstrate how the proposal would enhance biodiversity, and ensure links to the ecological network.	Comments noted. It is possible to implement more than one of the three options. Sustainable design and construction is promoted through policy in order to achieve high quality design, the Council extend this to cover healthy places and the movement of ecology through networks and green infrastructure.
46	Option 2. because we need to create connectivity between settlements in order to encourage greater alternative use of means of transport other than by car. This would deliver many fold benefits in terms of physical and mental health, less road connection, less pollution and a greater degree of interaction between communities. The concept of the Linear Parks across the borough should be prioritised and promoted as being core to the Local Plan.	Comments noted; it is agreed that facilitating sustainable modes of transport and exercise would bring multiple benefits. The 'West Lancashire Wheel' is advocated in the West Lancashire Economic Development Strategy 2015-25 (p56) and the Green Infrastructure and Cycling Strategy (September 2017) (p24-26).
47	All of these! Also, mixed use developments to make active travel such as walking and cycling feasible. At the moment, with single use zoning, people need to drive on the school run, to work, to shop, to leisure. And a lot of people in Skem don't have a car, and so they are stuffed - but is WLBC bothered?!	Comments noted. Policy options such as this one seek to address the issue of people without cars having difficulty accessing services.
48	Incorporate all 3 options. With Options 1 and 3, the open space features must be an integral part of the scheme and not tucked away in a forgotten corner to be under utilised or vandalised. A mix of careful planting to soften the built environment and green space for a range of active and passive leisure.	Comments noted; it is agreed that open space should not be 'tucked away'. Good planting is important.
61	Ideally all three options would be incorporated in order to create healthy and accessible environments for all because high levels of obesity are an issue in the North West region. In Tarleton & Hesketh Bank, for example, there has recently been significant housing development in the villages yet there has been no provision for parks to enable residents to enjoy walking and/or cycling. The delivery, rather than simply the vision, of Linear Parks should be given higher importance within the policies of the new local plan. The additional traffic generated by the developments presumably would have increased air pollution, yet the most accessible option for walkers is to use narrow pavements along often busy roads.	Comments noted, including links to obesity / health and wellbeing. In terms of open space, the Council is currently undertaking a open space assessment as part of its evidence base and this will inform WLBC on current / future need for open space. It is agreed delivery of the Linear Parks should be a priority.
64	Our Clients support Option 3, which requires residential developments over a certain size to incorporate public open space and amenity green space. Consideration should be given to off-site provision in lieu of on-site provision.	Comments noted. The Council is currently undertaking a open space assessment as part of its evidence base and this will inform WLBC on current / future need for open space.

ID	Representor Comments	Council Response
69	Surely all 3 of these options can be combined!	Comments noted.
70	<p>Whilst the Commissioners support the notion of creating healthy and sustainable places and that developments should incorporate play and recreation space where there is a proven need and it is appropriate and proportionate, such policies need to be carefully considered.</p> <p>The provision of open space and amenity green space within developments is a laudable aim but the Commissioners would expect to see detailed and robust evidence to support any requirements for developments to incorporate such spaces and that these would not undermine the viability of development in any way and frustrate future housing growth.</p> <p>For this reason, we believe such requirements need to be examined on a case by case basis according to localised need and the presence of existing facilities in the area. A blanket policy within the Local Plan Review would likely be too rigid in its application and would not endure through the plan period as circumstances will likely change over this time.</p>	<p>Comments noted. The Council is currently undertaking a open space assessment as part of its evidence base and this will inform WLBC on current / future need for open space. It is considered a policy would be better than no policy as there would be more certainty over what would be expected of developers, and a greater likelihood of delivery. Plan policies will be viability-assessed to avoid making 'typical' developments unviable.</p>
72	build houses where local children and parents can walk to school - improve pavements etc.	Comments noted.
75	<p>This policy issue acknowledges the importance of environments that promote mental and physical health, and all of the options proposed could be used to facilitate increased rates of physical activity, through recreation, sporting uses and active travel.</p> <p>West Lancashire faces a number of challenges in relation to health and wellbeing and experiences significant inequalities. For example, the percentage of physically inactive adults in West Lancashire in 2013 and 2015 was significantly higher than in England and the percentage of children classified as overweight or obese in West Lancashire was significantly higher than in England in 2014/15 and 4 of the preceding 7 years. The issue is addressed in paragraph 4.7 (with particular reference to walking and cycling): "The design of new development layouts can encourage increased activity levels and reduced car-usage in order to combat long-term excess weight and obesity related health problems, improve local air quality and to generally help residents and users to exercise more."</p> <p>It is recommended that a combination of all of the suggested policy options should be explored, as they do not appear to be mutually exclusive. Additionally community and road safety should be considered, as the perception and fear of crime, and the recorded KSI levels, can discourage active travel and the use of green facilities for physical activity. See previous comments above with regard to crime prevention and road safety.</p>	<p>Comments noted. It is agreed that the options do not need to be mutually exclusive. Links to health and wellbeing acknowledged. The Council is currently undertaking a open space assessment as part of its evidence base and this will inform WLBC on current / future need for open space.</p> <p>Sustainable design and construction is promoted through policy in order to achieve high quality design, the Council extend this to cover healthy places, and has adopted a Green Infrastructure and Cycling strategy.</p>
78	Encourage exercise and advertise swimming pool gyms and sports facilities giving information of access by public transport.	Comments noted.
82	Option 2: Require developments over a certain size to provide direct connections from the development to the wider cycling and walking infrastructure. With plenty of trees & bushes etc.	<p>Comments noted. The Council is currently undertaking a open space assessment as part of its evidence base and this will inform WLBC on current / future need for open space.</p>
87	Burscough Parish Council supports policies 2 and 3, and these are not mutually exclusive. All new developments should be able to access footpath networks, and all should include open space. Smaller developments should also contribute to local open space.	Comments noted; it is agreed that the options are not mutually exclusive.
96	AIUH make no specific comment in these respects, but is supportive of ambitions wherein development can promote healthy lifestyles.	Comments noted.
97	St. Modwen make no specific comment in these respects, but is supportive of ambitions wherein development can promote healthy lifestyles.	Comments noted
99	Our Clients support Option 3, which requires residential developments over	Comments noted. The Council is currently

ID	Representor Comments	Council Response
	<p>a certain size to incorporate public open space and amenity green space. Consideration should be given to off-site provision in lieu of on-site provision.</p>	<p>undertaking a open space assessment as part of its evidence base and this will inform WLBC on current / future need for open space.</p>
104	<p>The plan mentions 'natural infrastructure' in relation to the ecological networks earlier in the document but doesn't mention 'green infrastructure' specifically, this is fine as long as the LPA are planning strategically how the natural infrastructure can deliver a number of benefits for people and it would be helpful to acknowledge this in the document. Natural England welcomes and supports the policy suggestions regarding provision of green/open space in that it needs to be provided on site so it is close to where people live (as that's where most people will engage with the natural environment) but this also needs to sit as part of a wider network to enable people to fully uptake sustainable transport options and improve health through being more active.</p> <p>It would be good for West Lancashire LPA to support an approach that encourages developers to use natural solutions over 'grey' solutions to address onsite issues such as water management through SUDS and the acknowledgement that looking at the multifunctionality of green and open spaces allows them to address a number of these issues whilst also improving the quality of people's lives and quality of place for the site. Natural England reviewed the West Lancashire GI strategy for consultation recently and it was very closely tied together with the cycle strategy, so would expect that the wider sustainable transport network be more strongly supported through this paper.</p> <p>I will be in contact shortly to discuss how Natural England can work more closely with you during the development of this Plan.</p>	<p>Comments noted on 'natural infrastructure' and 'green infrastructure'. As stated by Natural England, WLBC have a Green Infrastructure and Cycling Strategy in place, adopted autumn 2017.</p> <p>The Council is currently undertaking a open space assessment as part of its evidence base and this will inform WLBC on current / future need for open space. Sustainable design and construction is promoted through policy in order to achieve high quality design, the Council extends this to cover healthy places. Support for SUDS noted; this is covered elsewhere in the Plan.</p>
107	<p>There has to b</p>	<p>(Incomplete response.)</p>

Question 26: Are there any other environmental policy issues that should also be considered? If so, what are they?

ID	Representor Comments	Council Response
9	New build should incorporate renewable energy technology e.g. solar panels	Comments noted.
10	<p>The utmost care must be taken not to build on or infringe the Green Belt, to maintain Greenfield sites as far as possible, and to utilise available Brownfield land and unoccupied existing housing as a priority. Environmental care and management must be given priority, not only to protect and encourage wildlife, but in recognition of the proven fact that green space is beneficial to mental and physical health, not least of all for children. Green space, including existing old-growth woodland and spaces such as Beacon Country Park must be sacrosanct. Close proximity to the countryside encourages physical activity.</p> <p>Local nature sites must be protected, and the value of trees in preventing or ameliorating flood risk should not only be acknowledged but acted upon. Rather than uprooting existing woodland or habitat corridors more planting - not just a tree in each new house - must be carried out. Renewable energy is of high importance and suitable sites for turbines and solar panels should be identified.</p> <p>Housing "creep" must be avoided at all costs to avoid loss of identity, to ensure that villages are not swallowed up by new development. As far as good design goes, the mistakes of the past should be acknowledged (Digmoor, Tanhouse for example albeit they were of their time) and affordable housing should be of the highest standards possible. Good quality building materials and plenty of space rather than cramming in as many properties as possible is important.</p> <p>Amenities should be more carefully considered. For example, the current Whalleys 4 development is taking place without any obvious reference to the fact that there are very few shops, one surgery and extremely limited parking to both, and no recreational facilities for children.</p>	<p>Comments noted and generally supported. It is agreed that:</p> <ul style="list-style-type: none"> - Green Belt should not be built on where avoidable - It is better to use brownfield land before greenfield - Green space, trees, and the natural environment provide multiple benefits and should be kept / protected where possible. - Renewable energy is important and should be facilitated. To this end, the Council intend to review their Renewable Energy evidence base in order to support renewable energy. - Good design is important. - New housing should be provided within easy reach of facilities.
12	Consider glamping sites.	Comments noted.
13	Heritage assets should be conserved in a manner appropriate to their significance. You number 12 historic monuments in West Lancs. I hope there will be full consultation with Halsall residents and the Parochial church council over Halsall rectory 14th century which has been badly damaged by mismanagement and neglect.	<p>Comments noted.</p> <p>The council undertake a wide consultation at each stage of the Local Plan process and opportunities are available for Halsall residents to comment on proposals. With regards to buildings in private ownership the Council have limited powers. However, as a council we produce Heritage at Risk reports and Conservation Area Appraisals and encourage the maintenance and enhancement of historic assets.</p>
14	non that I can think of	Comments noted.
18	no comment	-
19	How West Lancashire can be self sufficient in terms of food production? Active visible recycling at all refuse points.	Comments noted.
20	None at this time.	Comments noted.
23	Do not build on greenbelt! Redevelop brownfield sites and upgrade existing housing stock.	Comments noted, the council promote the reuse of brownfield land through

ID	Representor Comments	Council Response
		mechanisms such as the Brownfield Land Register. Council housing stock is maintained and upgraded where possible, subject to budget constraints (e.g. Firbeck). Upgrading existing private housing stock is not within the Council's remit.
28	Tree and woodland schemes. Measurement of air quality and action to reduce impact.	Comments noted; the importance and benefits of trees are acknowledged; maintaining air quality is also important.
30	No	Noted
31	Consider other microgeneration schemes for renewable energy. The agricultural business in the Northern Parishes may generate enough green waste to support an anaerobic digester.	Comments noted. The Council intends to undertake a Renewable Energy Study which will identify possible areas for renewable energy.
32	Build houses close to employment therefore giving people the opportunity to walk or cycle to work, and not spending time in traffic thus reducing harmful exhaust emissions.	Comments noted; this is a fundamental principle of sustainable development.
34	<p>Paragraph 1.3 discusses flood risk within the borough and touches on the location of new development. We agree that the location of new development goes to the heart of the Plan-making process however, if option four of the Strategic Development Options Paper is not selected and allocation of development is allowed within flood risk areas then you may need to incorporate flood risk into the other papers as part of allocating development.</p> <p>Additional Comments</p> <p>Other Environmental Policy Issues</p> <p>Climate Change and Peat Habitat - The 'thematic spatial evidence papers' 7.0 Climate change, energy and flooding highlights that West Lancashire has a higher per capita rate of CO2 emissions than its regional and national counterparts. It is highlighted within the Local Plan that Peat habitat represents a valuable agricultural resource however Peat is also a valuable habitat as it acts as a 'Carbon Sink' for Carbon capture and storage. Peat is also a fragile system and so development needs to be sensitive to this. Other implications of the erosion of Peat include a potential increase of flood risk downstream and a reduction of water quality.</p> <p>The Alt Crossens area that is currently managed by Pumping Stations is highlighted within the Local Plan as high grade agricultural land. This land is only available through the current active management and so the options for maintaining this land going forward may also need to be considered.</p> <p>Contaminated land/Redevelopment of Brownfield Sites. Within the Environmental paper there is no mention of contaminated land and remediation of sites. National Planning Policy Framework paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.</p> <p>Paragraph 120 states that local policies and decisions should ensure that new development is appropriate for its location, having regard to the effects of pollution on health or the natural environment, taking account of the potential sensitivity of the area or proposed development to adverse effects from pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121). - In addition, the North West River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. The remediation and reuse of contaminated land is an integral part of the improvement of water quality both for surface water and groundwater and, where consulted on development proposals on land affected by contamination, we will aim to</p>	<p>Comments on flood risk noted - flood risk is discussed primarily in the Strategic Development Options Paper.</p> <p>With regards to peat, WLBC will be liaising with the minerals and waste authority (LCC) to assist on peat-related policies.</p> <p>Alt Crossens comments noted.</p> <p>Comments on contamination / remediation and water bodies noted.</p>

ID	Representor Comments	Council Response
	<p>secure a level of remediation in parallel with national criteria set in the Water Framework Directive. We will support the Local Plan policies on the re-use of brown-field and contaminated land and we will apply a risk based approach to ensuring appropriate and sustainable remediation actions are secured to improve water quality.</p> <p>Detailed advice on the management of land affected by contamination can be found within our 'Guiding Principles for Land Contamination' documents which are available via our website https://www.gov.uk/government/collections/land-contamination-technical-guidance Water Quality/waterways</p> <p>Waterbodies within West Lancashire have been steadily improving due to the work of different partners however, they are still failing to meet the requirements of the Water Framework Directive as identified by the background Thematic Paper. A concerted effort is therefore required to further improve the waterbodies within West Lancashire. We therefore recommend that the protection/enhancement of waterbodies within West Lancashire in incorporated within the Environmental Paper.</p>	
39	<p>Response A: Other environmental policy issues include environmental protection against the impact of fracking where these measures will damage infrastructure and wildlife and general amenity and water supply in Flood Zones 2 & 3 and where aquifers exist. What protection measures can be included against detrimental affects of fracking activity and contamination and clean up of sites up to 200 x 2 acres of concrete in West Lancashire when PEDL licence areas 164 and 165 proceed.</p>	<p>Comments noted. Whilst WLBC understands residents' concerns over fracking this is a matter that falls under the remit of Lancashire County Council.</p>
44	<p>One cannot meet the local community energy needs with renewable energy unless we conserve energy in the first place. New buildings should conserve energy as top priority.</p> <p>Energy conservation and waste prevention are required to help remove threats from Fracking and avoid more landfill sites.</p> <p>High levels of insulation, ground source heat and biomass should be promoted through the design of buildings. Solar hot water on houses is far more effective than solar electricity panels and needs support. Building roofs need to be orientated to take maximum advantage of solar power (not necessarily the whole building). -</p>	<p>Comments noted. It is agreed that energy conservation is an important consideration. Comments on heat and solar energy noted. WLBC do not cover fracking; this falls under the remit of Lancashire County Council.</p>
46	<p>Air quality is emerging as one of the most important factors in terms of impact on health with new evidence being produced to drive this issues up on the national and international agenda. Diesel particulates from HGV's within the borough are of concern and air quality therefore should be given a high level of importance throughout the borough and should contribute significantly to the formation of environmental policy development. Consideration should also be given to the widespread use of pesticides and herbicides, in particular neonicotoids.</p>	<p>Comments noted and supported. It is agreed air quality and pollution is an important issue. This is considered within the WLBC policy approach to sustaining the Boroughs' environment and tackling climate change. Comments on pesticides noted; this is beyond the remit of the Local Plan, unfortunately.</p>
47	<p>Rural livelihoods. West Lancs is traditionally the bread basket of Lancashire, feeding the mill towns in the east. More community farms and orchards in close proximity to housing or at least easily reached via public transport.</p>	<p>Comments noted and supported.</p>
50	<p>This Topic Paper covers the Environmental Policy Options. The vast majority of this paper has no direct specific impacts on the safety and operation of the SRN, and there is therefore no need for Highways England to provide comment.</p> <p>However, Environmental Policy Issue 3: Sustainable Design and Construction offers three options in regards to a potential policy which addresses sustainable design and construction. While not strictly directly impacting on the operation or safety of the SRN, encouraging sustainable design is vital in minimising the need for travel and facilitating the use of sustainable travel, potentially lessening vehicular demand for the SRN. The Topic Paper gives an example of the inclusion of a policy requiring new houses to have a suitable external power connection for charging electric</p>	<p>Comments noted; it is agreed that planning to reduce the need to travel is important; it is noted that electric vehicles will not necessarily reduce congestion; however, they will reduce pollution in congested areas and should result in fewer air quality issues.</p>

ID	Representor Comments	Council Response
	<p>vehicles (although it should be noted that while there are significant environmental benefits to electric vehicles, the method by which a vehicle is powered does not reduce congestion).</p> <p>The Topic Paper presents three general policy options in regard to sustainable design and construction, which are summarised as:</p> <ol style="list-style-type: none"> 1. Require specific sustainable design and construction features or measures to be incorporated into new developments. 2. Do not require any specific features or measures through policy. 3. Require new development to contribute financially to a Community Energy Fund. 	
52	<p>The Environment: I agree with the issues. Yes we should protect nature sites, and develop wind and solar power. Perhaps this would be more welcome if it were local council owned and generating power for local people, a community project, reducing our costs.</p>	<p>Comments noted. The Council intends to undertake a Renewable Energy Study which will identify possible areas for renewable energy.</p>
62	<p>No comments are provided in respect of the Environmental Policy Options Paper.</p>	<p>Noted</p>
64	<p>No comment.</p>	<p>Noted</p>
69	<p>Encouraging all developments to minimise the emissions produced in their construction and use, also by associated transport movements. Measures that remove nitrogenous emissions as well as carbon emissions</p>	<p>Comments acknowledged.</p>
72	<p>encourage people to cultivate gardens to create habitat. incentivize developments that encourage pollinators such as apiary.</p>	<p>Comments noted.</p>
73	<p>No comments.</p>	<p>Noted</p>
77	<p>to encourage domestic rainwater etc.</p>	<p>Comments noted.</p>
78	<p>To improve air quality around factories or to keep pollution to a minimum especially water ways streams etc. Use rain water where possible domestically.</p>	<p>Comments are noted and supported. Air quality and pollution are considered within the WLBC policy approach to sustaining the Boroughs' environment and tackling climate change.</p>
82	<p>Resist all attempts to Frack in West Lancashire</p>	<p>Comments noted. Whilst WLBC understands residents' concerns over fracking, this falls under the remit of Lancashire County Council.</p>
83	<p>Rural economy = a 1000% tax on any fracking and the money used to provide deep drilled ground source heating for glass houses in Banks/ Tarleton so we can grow tomatoes etc all year rather than importing from Spain. Solar farms with livestock/ grazing beneath should be permitted development.</p> <p>Mixture of agriculture with good road links for distribution vehicles plus rural crafts wildlife areas tea shops walking and cycling routes.</p> <p>Maybe another 2 x canal marinas one near to Downholland Cross and one in Parbold so boats can potter up and down between Rufford - Burscough - Pinfold - Downholland - Parbold. -</p>	<p>Comments on the various matters noted. Whilst WLBC understands residents' concerns over fracking, this falls under the remit of Lancashire County Council.</p> <p>As a general principle, locally grown food (without high winter heating requirements) is more sustainable than foreign imports.</p> <p>The tourist features mentioned are noted.</p>
92	<p>Lastly there is a very urgent need to address concerns over air quality. There is now clear evidence that NO2 emissions have negative health effects, including respiratory symptoms, asthma prevalence and incidence, cancer incidence, adverse birth outcomes and mortality. In the Liverpool City Region Devolution Deal there is a commitment to explore a Clean Air Zone in the Liverpool City Region. This will require a bold package of measures including Clean Air Zones and electrification / decarbonisation of transport across all modes.</p> <p>In December 2015 Defra published a national air quality plan, "Improving air quality in the UK: Tackling nitrogen dioxide in our towns and cities", intended to meet legally binding EU air quality targets. The core of the plan was the introduction of Clean Air Zones in five cities by 2020: Birmingham, Leeds, Nottingham, Derby and Southampton. In November 2016, in a case</p>	<p>Comments on air quality are noted and agreed; if a Clean Air Zone is established locally, WLBC will note / comply as appropriate. Air quality and pollution is considered within the WLBC policy approach to sustaining the Borough's environment and tackling climate change.</p>

ID	Representor Comments	Council Response
	<p>brought by NGO ClientEarth, the High Court of Justice quashed Defra's plan, as it fails to comply with the required EU legislation. Among other issues, the court ruled that the plan is based on over-optimistic air quality modelling which uses data from laboratory tests of diesel vehicles, rather than empirically observed emissions data. Following the ruling, Defra has been ordered to produce a new final air quality plan by July 2017. This was reiterated by a ruling at the High Court this week. The High Court ruling has important implications for the Liverpool City Region. Based on Defra's original air quality modelling assumptions, the Liverpool City Region would not be in exceedance of EU air quality targets, and would therefore not be legally required to introduce a Clean Air Zone. With the less optimistic assumptions Defra has now been ordered to use, this may well change. This will be important to keep an eye on and amend and strengthen the policy position in West Lancashire and the Liverpool City Region if required to tackle the increasingly urgent air quality challenge.</p>	
96	<p>AIUH make no specific comment in these respects.</p>	<p>Noted.</p>
97	<p>St. Modwen make no specific comment in these respects.</p>	<p>Noted.</p>
99	<p>No comment.</p>	<p>Noted.</p>
104	<p>Habitats Regulations Assessment (HRA) Screening - Natural England has reviewed the initial screening of the West Lancashire Local Plan Issues and Options in relation to European designated sites and agrees at this early stage of the Plan, that the spatial options are insufficiently developed to accurately predict the potential effects upon those sites.</p> <p>Once additional work on the HRA Screening has been carried out, any sites where likely significant effects (LSE) cannot be ruled out, will require Appropriate Assessment to determine whether there would be an adverse effect on the integrity of the European designated sites. Where there are adverse effects, mitigation will be required. The level of assessment in the HRA needs to be sufficient to determine the scale of impacts and an appropriate scale of mitigation. The scope of the mitigation needs to be presented in the Plan along with an identified mechanism to deliver it. We would encourage you to consider the need for strategic mitigation as appropriate. Strategic mitigation is a positive response to a regularly occurring issue whereby a solution is applied through relevant plans or strategies, resulting in better outcomes than would occur through a case by case approach. This may include, for example, establishing areas that are managed specifically for displaced birds, or activities that reduce recreational disturbance.</p> <p>Natural England agrees that the potential impacts identified below will need to be considered and assessed throughout the review process:</p> <ul style="list-style-type: none"> ☑ Direct habitat and species loss associated with European sites; ☑ Habitat degradation as a result of increased air pollution; ☑ Loss of habitat functionally linked to a European site (i.e. used by overwintering birds for foraging); ☑ Disturbance to habitats and species through increased recreational activity; ☑ Changes in water quality where sites are hydrologically linked to European sites; ☑ Disturbance to species as a result of construction activities/operational stage. <p>Where there are impacts on European sites, the HRA should provide a clear methodology and evidence that all alternative sites for the allocations, including energy related ones, have been explored. There may also be opportunities for cross-boundary approaches with neighbouring authorities. Natural England is keen to stress at this time that there needs to be a consistent approach between this Local Plan review and associated HRA. The likely issues are clearly highlighted above but this list may not be exhaustive.</p> <p>Natural England notes that the consultants at Arcadis have recently worked on HRA's for several neighbouring Local Planning Authorities including</p>	<p>Comments on initial HRA screening noted. At the Preferred Options stage, where specific sites are proposed for development, a more 'definitive' HRA will be carried out that will comply with the various requirement set out in the representation from Natural England. The Council will fulfil its legal requirements in respect of the results of the HRA, should e.g. Appropriate Assessment / mitigation be required. Comments on 'strategic mitigation' noted.</p>

ID	Representor Comments	Council Response
	<p>Lancaster, Fylde and Wyre, which have similar issues. Following extensive engagement with Natural England, Arcadis have now developed a much clearer understanding of the evidence and assessment required, and would therefore be expected to be able to apply their knowledge and experience to this Plan in a similar way.</p>	

Question 27: Which option(s) for the approach towards affordable housing policy do you think is (are) most appropriate for West Lancashire? Why?

ID	Representor Comments	Council Response
1	Option 7 you must be flexible when building homes but maybe affordable housing should be shelved as it hasn't had the desired affect	Noted; it is agreed flexibility is useful. It is not considered that affordable housing should be shelved as there is a Borough-wide need for it, plus national policy requires provision of affordable housing.
2	Option 6 all area's in west Lancashire should be open to so called affordable homes	Comments noted
9	Option 1. I do not believe it is tax payers or private companys responsibility to subsidise those who want what they cannot afford.	Comments noted. Non-provision of affordable housing will not address the current housing crisis.
14	option 2, and let the market dictate in general	Comments noted
18	no comment	-
20	Option 3: Carry on with a broadly similar policy to policy RS2 of the current Local Plan Option 5: Allocate specific sites for 100% affordable housing schemes - These options seem the most favourable. However they will only work if they are properly implemented adhered to and monitored. We are aware of various recent developments where no affordable housing has been provided.	Comments noted. Under national policy, viability has to be taken into account when determining the amount of affordable housing for individual schemes.
23	Option 1. Affordable housing should not be a priority in this development	Noted. The Council's evidence base and other material indicate that affordable housing is an issue that needs to be addressed.
24	I would go for the option which would provide much more affordable housing and also housing for the elderly and infirm. Recent building projects have a lot of new housing but they have not provided a lot of smaller starter homes or homes for the elderly single/couples. I think these sort of homes are essential. It would provide first step on the ladder houses for first time buyers. It would enable the elderly to move from large, unmanageable premises into smaller homes. With the latter, it will require the building or perhaps bungalows or sheltered accommodation which seems to be in short supply at the moment. Option 7.	Comments noted; there is a need for affordable housing across the Borough, and it is agreed tehre is a need for smaller properties to enable downsizing, and housing for the elderly.
26	There is no one size fits all, but I would steer away from creating 'sink' estates.	Comments noted; in general, planners aim to 'pepperpot' affordable housing through developments rather than locate it all in the same place.
28	Option 8 as the current definition of affordable housing is not fit for purpose. There needs to be a policy for socially rented housing as the private rents are often unaffordable.	Comments noted. The current definition of affordable housing comes from national policy; within this definition there is scope for variation, from the most affordable social rented tenure, through to discounted market properties. A balance needs to be struck between a smaller number of more affordable properties and a larger number of less affordable properties.
30	The two separate markets, housing for purchase and housing for rent	Comments noted; it is agreed that housing

ID	Representor Comments	Council Response
	<p>should have separate policies. so Option 4 is my preferred choice along with Option 8 for the problem of affordability differs according to income group. Skelmersdale does not need more affordable houses for first time buyers but more larger new dwellings for second and third time buyers to move up market and to attract executives and managers to the town. There is a need for single person flats to rent.</p>	<p>for purchase and housing for rent are different in characteristic, and that affordable housing needs vary by area / income group. Comments on housing need in Skelmersdale acknowledged; it is agreed that a mix of housing types and sizes is needed.</p>
31	<p>Option 4 also consider creation of small Council estates with right to buy after 10 years.</p>	<p>Comments noted.</p>
32	<p>Option four adding more detail seems sensible with changing demographics come changing demands. - Option eight the Council needs more flexibility in its ability to define affordable housing, different areas in the borough have very different needs. - Option three carrying on with similar policy is not viable, Policy RS2 seems to be easy for developers to avoid as they merely have to cite economic Viability, and councils seem to have to give in to them.</p>	<p>Comments on variation of affordable housing needs according to demographics and location acknowledged. Councils are required by national policy to take viability into account in individual developments.</p>
35	<p>It is accepted that the 'do nothing' option of the delivery of affordable is not appropriate and will not deliver the number of affordable homes required. It is widely recognised that affordable homes are often delivered as a result of residential schemes for predominantly market housing and this mechanism of delivery will need to be continued. Therefore, it is necessary to identify how such schemes can assist in the delivery of affordable homes in the Borough.</p> <p>As acknowledged by WLBC, the approach proposed under option 2 is well established and supported across the country and when enforced effectively can deliver the required number of affordable units.</p> <p>Option 3, which is effectively a more detailed version of Option 2 is also generally supported and will see the delivery of affordable homes. However, both sub-options within Option 3 will need to include an element of flexibility to ensure that developments are considered on a case-by-case basis and the viability of the scheme is carefully considered. Furthermore, when applying a 'percentage approach' dependent on the geography or size of a development, it will be important for the policy to be supported by a robust and sound evidence base to ensure the approach is appropriate across the Borough.</p> <p>Flexibility will also be necessary if Option 4 is progressed, as the details will differ geographically and be dependent on the type of development coming forward. This policy is considered, therefore, more difficult to impose and could detrimentally impact upon the delivery of schemes.</p> <p>WLBC themselves acknowledge the risks associated with the delivery of Option 5 - we agree with this cause for concern and consider similar in relation to Option 6. There is a risk that reliance on such sites could remove the need for the delivery of affordable units elsewhere, and if these 100% sites or 'permissive' do not come forward this will result in a shortfall in the number of affordable homes being delivered.</p> <p>Option 7 is supported, such an approach, often implemented elsewhere, will ensure that affordable homes can be delivered within the most appropriate locations where they are needed to support the population. This flexibility is supported.</p> <p>The flexibility in the definition of affordable, as suggested under Option 8, is partially supported in that it will ensure the delivery of a wide range of homes to meet the needs of the population and although not officially 'affordable' such homes may meet the needs of some, effectively addressing housing requirements and reducing the need for affordable homes. However, the Plan must be compliant with the National Planning Policy Framework, and as such some caution must be applied to this approach if implemented to ensure the plan is in accordance with national planning policies and guidance.</p>	<p>Comments on the different policy approaches noted, including the support / partial support for options 2,3,7,8, the need for flexibility, and the need for a robust evidence base were option 4 to be pursued. The need for compliance with national policy is acknowledged.</p>
39	<p>5.Allocate specific sites for 100% affordable housing schemes would target affordable housing to meet community needs.</p>	<p>Comments noted. It is agreed that the allocation of specific sites for affordable</p>

ID	Representor Comments	Council Response
	<p>6.Include permissive policies for affordable housing. Allowing affordable housing.</p> <p>Responses A&B:</p> <p>Comment : Options 5 & 6 favour the provision of small clusters of housing in rural settlements such as Halsall which meet the needs of the community. Affordable housing enables local communities to remain intact where otherwise young families need to move away from desirable rural locations aimed at executive style housing market.</p>	<p>housing, and 'exception site'-type policies would be a means to facilitate affordable housing for local needs in villages / parishes such as Halsall.</p>
42	<p>We have no comment at this time.</p>	<p>Noted</p>
45	<p>Housing developments that encourage a good 'work-life balance' and sustainable communities should be supported.</p> <p>A variety of housing is needed with small starter homes and larger homes (to encourage working from home) with community facilities and small offices close by.</p> <p>Small offices (designed to look similar to residential homes) mixed with houses that blend in with the housing (not a giant office block or industrial units) are helpful for supporting small businesses and a thriving local economy. This type of development enables people to walk to work.</p> <p>It is vital to have community facilities within close walking distance of homes.</p> <p>A garden village development would benefit West Lancashire.</p> <p>Opportunities for self-build developments are essential.</p> <p>A strict greenbelt policy is supported, except there should be a minimal nibbling away to allow villages to become more sustainable, while preserving green space between settlements.</p> <p>Housing density needs to allow space for planting small trees and joined up pavements where people can easily walk between locations.</p>	<p>General comments on housing noted. It is agreed that a mix of housing is required, and that, ideally, new residential development should be within easy reach of facilities by sustainable means of transport.</p> <p>Support for garden village noted.</p>
46	<p>Options 6,7 & 8 because the current approach is not delivering sufficient numbers of the right type and price range of housing in the borough.The 'Test of Viability' undermines policy to such a degree that it renders the current approach obsolete. A new approach is needed to tackle the chronic imbalance in the housing market. A more creative approach is also needed to make an important contribution towards the regeneration of Skelmersdale.</p>	<p>Comments noted, including support for options 6,7, and 8. The requirement to have regard to viability comes from national policy. The need to regenerate Skelmersdale is acknowledged.</p>
47	<p>I would like to see more flats and small houses in Skelmersdale, all over the place. More housing that people in Skem can afford. I like how a lot of the estates are low rise high density developments.</p>	<p>Comments noted</p>
48	<p>Option 4 gives greater control and flexibility over the quality and suitability of the housing stock. Option 8 gives greater flexibility over the definition of affordable housings so the Council do not have to follow the NPPF national definition if it is deemed inappropriate.</p>	<p>Comments on options 4 and 8 noted. The Local Plan must be in conformity with the NPPF; this is one of the tests of soundness against which the plan will be judged.</p>
52	<p>People Housing and Services: Generally agree with suggestions. Housing costs seem a major issue for many – undermining standards of living. A mix of cheap rented and for sale housing – enough to keep prices down. Public spaces should be preserved – parks, pool, library, public streets. Facilitate Edgehill building halls of residence on site.</p>	<p>Comments and general agreement noted. It is agreed that housing costs are a major issue, that cheaper houses are needed, that public spaces / facilities should be retained.</p> <p>Comments on Edge Hill University noted.</p>
57	<p>The LPAs adoption of CIL appears to be severely affecting the viability of affordable housing on market-led schemes. It is unclear if the CIL monies are delivering any community assets which are sufficiently beneficial to outweigh the lack of affordable housing.</p>	<p>Whilst the CIL Viability Appraisal concluded that there was 'headroom' for CIL, taking into account the affordable housing requirement, it is accepted that CIL could affect viability in some cases, although there are other factors also affecting viability.</p> <p>CIL money will be spent on a variety of community assets; projects are chosen following consultation with West Lancashire residents for each round of spending.</p>

ID	Representor Comments	Council Response
58	<p>The NPPF requires the needs of both market and affordable housing to be delivered across the Council area (paragraph 47). The HBF would therefore expect the Council to consider a wide range of initiatives to ensure that the affordable housing needs of the area will be met in full over the plan period. It is therefore considered that a range of the options identified should be utilised.</p> <p>The main delivery mechanism for affordable housing is likely to be via market housing schemes. The delivery of affordable housing via this route is, however, highly dependent upon economic viability impact on the scheme. The NPPF (paragraph 174) is clear that the Council can only require affordable housing contributions, from market schemes, as justified by evidence of need and viability. Both options 2 and 3 provide such a mechanism. The HBF has no particular preference in relation to delivery by options 2 or 3, providing the choice is based upon robust evidence of need and viability across the district or geographical area. The possibility of a zero requirement within Skelmersdale should not be discounted if this is required to promote the regeneration and investment required within the town.</p> <p>The HBF would support the Council in providing other sources of affordable housing delivery as described in options 5 and 6. In relation to option 5, 100% affordable housing, it is important that sites are only allocated if there is a realistic chance they will be delivered.</p> <p>The HBF would also support the inclusion of flexibility within any policy, as described by option 7. Such an approach is common in many successful affordable housing policies and enables sites to be brought forward which contribute to the affordable housing requirement yet retain viability. This will enable sites which otherwise may not come forward, or would not provide affordable housing, to assist in meeting the affordable housing needs of the area.</p> <p>We also refer the Council to our response to the housing OAN, paragraph 13, above. If, as is likely, the evidence does not suggest that the full affordable housing needs can be met with the chosen housing requirement then the Council should consider if a higher overall requirement would assist in delivering the affordable housing needs of the area (PPG ID 2a-029).</p> <p>In relation to option 8 the HBF would support such flexibility by enabling the delivery of products which may not fulfil the NPPF affordable housing definition but would provide a form of lower cost housing. It should also be noted that the Government intends to amend the definition of affordable housing as set out within the NPPF. This is set out within the recently published housing white paper.</p>	<p>Comments noted: WLBC is aware of the NPPF objective to meet market and affordable housing needs, and for PPG advice that consideration be given to a higher housing target if affordable housing needs cannot be met in full. Support for options 2 and 3, and for 5, 6 and 8 noted. The caveat that sites should only be allocated for 100% affordable housing developments if they have a good prospect of being delivered is noted. Comments on the need for flexibility noted.</p>
61	<p>Options 2, 3 & 4 because specific policies setting out the requirements for affordable housing are needed because developers do not generally want to build affordable homes because they generally generate less profit for the developer than market priced homes. These policies can guide the appropriate mix of housing delivered.</p> <p>A further difficulty is that the term 'affordable homes' is subjective and developers can use viability as an argument for not building this category of home.</p> <p>The important consideration should be to ensure the correct mix of housing is provided on each site. This would depend on the needs of the area where the site is located and the demographics. Housing for an ageing population is also important.</p>	<p>Comments noted, in particular support for options 2, 3, and 4. The definition of 'affordable housing' is set by national policy, which also requires the Council to take account of viability. It is agreed that the mix of housing is important and that this will vary according to area and demographics. The need for old people's housing is acknowledged.</p>
64	<p>Our Clients are supportive of the provision of affordable housing however, the most appropriate method is to undertake an approach which includes the "usual" approach to affordable housing, and for this to be based on a broadly similar approach to the existing relating to geographical variation. In applying this method, consideration does however need to be given to the Government Ministerial Statement which confirms that on schemes of less than 10 dwellings, no affordable housing provision is required, therefore a "blanket" percentage requirement approach would not be</p>	<p>Comments noted, including support for a hybrid of options 2, 3 and 4. The Council is already applying the national threshold of 10+ units, and is aware of the new definition of affordable housing as first set out in the Housing White Paper. Support for off-site affordable housing and for rural exception sites noted.</p>

ID	Representor Comments	Council Response
	<p>feasible.</p> <p>Consideration should also be given to off-site provision in terms of a financial contribution, when tested through a Viability Appraisal. The ideal mixture of approaches would be a hybrid of Options 2, 3 and 4.</p> <p>It is noted that Options 5 and 6 refer to affordable housing schemes. Rural Exception Schemes are supported through Paragraphs 54 and 89 of the NPPF and the emerging Local Plan should support Rural Exception Sites in principle.</p> <p>Consideration should also be given to the Housing White Paper which seeks to amend the definition of affordable housing, as set out in the NPPF, to include lower cost housing</p>	
66	<p>It is noted that in recent years the delivery of affordable housing in West Lancashire has been below the identified annual need. It is important that any strategy relating to the delivery of affordable housing must allow for a degree of flexibility going forward.</p> <p>The provision of affordable housing is a key priority that the Council should seek to achieve through the Local Plan Review. If the evidence base suggests that a certain level of affordable housing is required and the Council is not seeking to address this through the Local Plan Review, then the affordability gap will only continue to worsen. The Council should note guidance set out in the PPG, which states that “the total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”</p> <p>It is considered therefore that as a minimum the housing target should be considered to reflect the upper end of the range considered in the strategic options paper to help assist in delivering affordable housing needs.</p>	<p>Comments noted, including the need for flexibility going forward. It is agreed that affordable housing is a priority for the Local Plan Review.</p> <p>The Council is aware of the advice in PPG regarding affordable housing delivery and its relation to overall housing targets.</p>
67	<p>See attached statement - need for balanced housing delivery.</p>	<p>Comments noted, including the recommendation that higher levels of growth be considered in order to deliver more affordable housing.</p>
69	<p>Option2 (enforced contractually with a tight definition) plus possibly option 5 so that the Council and not greedy developers are in control</p>	<p>Comments noted, including support for option 2 and possibly option 5. The Council is required to conform to national policy, which includes a requirement to have regard to viability.</p>
70	<p>Irrespective of the plan period which is chosen (see our comments in Section 2 above), any affordable housing policy within the Local Plan Review will need to endure over a long period of time. It is therefore imperative that sufficient flexibility is provided so as to prevent the - policy becoming out-of-date and not fit for purpose.</p> <p>We note the options presented within the paper regarding how affordable housing should be addressed within the Local Plan, however it is likely that elements of several of these options should be brought forward in order to seek to address the affordable housing need within the Borough.</p> <p>As such we would advocate:</p> <ul style="list-style-type: none"> • Providing a percentage affordable housing contribution for schemes of 11 dwellings or more (in line with the NPPG) and base the percentage on robust and up to date viability data. We would expect this to form part of the Council’s evidence base. • Allowing discussions to be undertaken at the development management stage if there are viability or other reasons why the affordable housing percentage cannot be met. This would allow the affordable housing contribution to be adjusted on a case by case basis. • Providing a broad definition of affordable housing to include starter homes and discount market value homes. This will ensure all areas of the 	<p>Comments noted; it is agreed that 'future-proofed' policies are advisable, and that policy needs to be based upon a robust evidence base. The Council is aware of the requirement to take into account viability on a case-by-case basis. Comments on tenure splits are noted.</p>

ID	Representor Comments	Council Response
	<p>housing market are catered for and will provide a degree of 'future proofing' for the policy to take into account any future changes in the Borough.</p> <ul style="list-style-type: none"> Resisting the temptation to prescribe rigid tenure splits within the affordable housing policy given that the requirements for specific tenures are likely to evolve over time and can be influenced by other government initiatives (such as the current Help to Buy scheme). <p>Whilst we note the Council's concerns regarding whether a flexible policy will deliver the required affordable housing units, as outlined in Section 2, a higher overall housing requirement will help ensure delivery of affordable housing (as advocated in the NPPG).</p>	
72	<p>Encourage mixed developments of public and private dwellings particularly smaller development of say up to 10 homes. The old prejudices are breaking down. use allocation of housing land to support the approach.</p>	<p>Comments noted</p>
73	<p>No comments.</p>	<p>-</p>
74	<p>The Plan should widen the scope for providing 100% affordable housing schemes in all locations in the Borough, ensuring that as much of the identified need can be met as possible.</p>	<p>Comments noted; 100% affordable housing schemes are already permissible in all parts of the Borough (subject to compliance with, e.g. policy on nature conservation sites, and with smaller developments in the countryside).</p>
75	<p>The provision of a decent home is a primary wider determinant of health and wellbeing. It is important that an affordable housing policy is included in the Preferred Options Paper and that the policy is based on delivering appropriate accommodation to meet the needs of all. Housing affordability should not be the only criteria with regard to provision but should be considered alongside other criteria including quality, choice, type, tenure, size.</p> <p>It is noted that in the Sustainability Appraisal, Option 4 (detailed affordable housing policy) and Option 8 (Council flexibility in how affordable housing is defined) perform well relative to the current local plan policy baseline. Consideration should also be given to on/off site provision with particular regard to using contributions to improve the existing housing stock within the Borough, including in Skelmersdale.</p>	<p>Comments noted; it is acknowledged that health and wellbeing is an important consideration in preparing the Plan. Performance of options 4 and 8 in the Sustainability Appraisal is noted, as is LCC's support for off-site provision of affordable housing.</p>
77	<p>Wherever new developments are built, encourage to have affordable new housing along with any other planned homes.</p>	<p>Comments noted - this is effectively options 2/3.</p>
78	<p>Wherever new developments to have a percentage of affordable housing integrated to encourage local only young people with restriction on resale.</p>	<p>Comments noted - this is effectively options 2/3. Affordable housing is offered first to local people on the waiting list. Affordable housing is to be affordable in perpetuity; this often imposes restrictions on resale.</p>
79	<p>The Council identifies housing affordability as a longstanding issue and highlights that its ability to deliver affordable housing has been significantly curtailed for various reasons. A number of options are set out taking account of recent constraints. Responses are set out below, but in principle Story Homes supports the need for the delivery of affordable housing, subject to viability considerations and agrees that a combination of the options set out below may be most appropriate.</p> <p>Story Homes agrees that this option is not suitable, as the absence of an affordable housing policy would provide no certainty or consistency for developers and more importantly, would be unlikely to help address the affordable needs which clearly exist in West Lancs.</p> <p>This option is the traditional way of securing the delivery of affordable housing and is the standard approach followed by authorities nationally. Story supports this approach in principle with the caveat that viability must</p>	<p>Extensive comments noted, including support for options 2 (paying attention to viability), 5 (provided sites can be delivered), 6 (subject to robust justification), 7 and 8 (provided the policy is not contrary to national policy). The recommendation of a 0% requirement for Skelmersdale is noted.</p>

always be carefully considered to ensure that the provision of affordable homes does not prevent development coming forward. It is considered that if there has been a downturn in the delivery of affordable in recent years in West Lancs, the Council should reassess its CIL contributions and the priority it places on the delivery of affordable relative to other obligations which may currently be given priority.

This option suggests that a broadly similar approach to Policy RS2 of the West Lancashire Local Plan 2012-2027 could be followed which includes variations across the Borough. The geographical approach requires no affordable provision in Skelmersdale on account of several factors including the existing availability of cheaper properties, with an affordable requirement elsewhere in the Borough where the market is stronger. The second variation is numerical, essentially requiring a higher percentage of affordable as the size of the development increases. As detailed previously in these representations Story does not consider the housing market in Skelmersdale to be strong and this, combined with the good availability of existing affordable properties supports the principle of a distinct zero affordable requirement here. The 'economies of scale' approach of variations based largely on the size of the development is not used by the majority of authorities' nation-wide and is considered to be an additional layer of complexity. Sites should be considered on their merits and where the affordable requirement cannot be met, a viability report should be required to justify a reduction. Such is the variation in abnormals between sites their size is not often a key determining factor in their ability to accommodate affordable housing. Story would therefore suggest that the Council should retain the exception policy for Skelmersdale, but consider dropping the numerical aspect of the RS2 policy.

Story Homes considers that affordable housing policies in local plans should not be so specific as to seek to fix tenure and size requirements, as needs will change during the plan period and as such too much detail can make policies quickly out of date. Supplementary Planning Documents are a more suitable vehicle to provide additional guidance and can typically be amended to reflect market changes and differing needs in shorter timeframes. Story Homes does not therefore support the inclusion of additional detail in the Local Plan policy.

Delivery of 100% affordable schemes have historically proven to be challenging, as without values achieved by open market housing the values may not exist to allow the sites to come forward. Equally funding streams for RSLs are notoriously changeable. Story Homes, whilst not completely opposed to the principle of such allocations, does question the logic in such an approach because of the aforementioned concerns.

This option would introduce a policy which makes special allowance for the delivery of affordable homes in areas where they would not normally be permitted, such as Green Belt or beyond settlement boundaries. Story Homes believes that the need for such exceptional cases would need to be very clear, but supports the policy in principle as it would have the potential; to deliver a greater quantum of much needed affordable housing. Story Homes supports policies which allow for greater flexibility which should allow for a greater quantum of affordable homes to be delivered. The suggested option of allowing for off-site contributions in lieu of on-site provision is a widely used policy nationally and it is considered that the inclusion of a policy which allowed for this approach in suitable circumstances should be included.

The Council suggests that greater flexibility could be applied which goes beyond the definition of affordable housing as set out in the NPPF. Whilst Story considers this Option to be a positive one, the Council must be careful that any wider definition of affordable housing does not render the plan at odds with the NPPF and therefore at risk of being unsound. That said, if the policy can be fully justified then this would be a policy which should help to achieve greater affordable delivery. Story Homes would welcome further discussions with the Council on this option as the Plan progresses.

ID	Representor Comments	Council Response
81	<p>Where sites are not viable as a result of the specified affordable housing provision, provided that this can be demonstrated, then only what element of affordable housing that can be delivered should be included within the s.106 agreement.</p>	<p>Comment noted; this is standard general practice.</p>
82	<p>Option 5: Allocate specific sites for 100% affordable housing schemes Option 6: Allow affordable housing in locations where general market housing would not be permitted.</p> <p>A major problem is building/property development companies hoarding land on which they are not building in order to artificially inflate house prices and maximise the profits on the houses that they do build. The large builders monopoly on available building land also artificially inflates the value of the land they hold. Access to land and home building needs to be democratised and power shifted away from large companies and their negative practices.</p>	<p>Support for options 5 and 6 noted. Issues associated with land values and build rates are noted; these issues are not specific to West Lancashire are need to be addressed on a nationwide basis.</p>
84	<p>As identified, affordability is a key issue in West Lancashire and it is telling that although the current Local Policy is set to a 35% requirement for affordable housing in new development (over the size threshold), only 20% of new development delivered actually was affordable.</p> <p>Persimmon Homes support greater flexibility in the delivery of affordable housing, both geographically, in relation to tenure, delivery mechanisms and site viability. Therefore a combination of the options is considered the most appropriate to ensure effective and timely delivery of new affordable houses in to the market in the most appropriate and sustainable locations. Requiring 100% affordable schemes will significantly narrow down the delivery bodies willing to take on such sites as well as the viability. Therefore this option is discouraged.</p>	<p>Comments noted, including the recommendation that a combination of the options be pursued. The 35% target has not been met as a consequence of taking viability into account on a case-by-case basis. Support for flexibility is noted, as is the lack of support for option 5.</p>
85	<p>This should take account of the ageing population and persuade developers to build more bungalows and encourage a range of developments that allow realistic downsizing to happen. Affordable housing should be encouraged but without being prescriptive to a certain amount as it should reflect the differing needs of an area and the amount of infrastructure required to be costed into any development.</p>	<p>Comments noted, including the need to avoid policies being over-prescriptive, but to encourage a range of housing according to the needs of different areas.</p>
87	<p>The term “affordable housing” has a specific meaning in planning terms and in general this is not understood by lay people. Because these are words in everyday use, the general population would not expect a specific meaning to be attached to the phrase. To use it in consultation documents, without very clear explanation (not just in glossary) is misleading.</p> <p>Creating and retaining housing that is within reach of first time buyers with local links, and available with secure tenancies, is extremely important. Providing housing suitable for people with special needs, who require specially designed homes is important. Flexibility in the housing market is essential. Up to date data on which to base requirements is key to determining need.</p> <p>There must also be suitable housing for young couples and single people and appropriate housing for people with disabilities and learning difficulties who can live in the community, while it is mention it needs to cover a wide range of potential residents needs and situations, however it is essential that this is documented and included in any proposals.</p> <p>In the last few years the housing market has changed quite considerably as young people are earning less, temporary/short term employment, having difficulty in gaining mortgage and with graduates having large amounts of debt the last thing many young people are thinking about is buying an expensive house. Young people also see themselves in temporary situations in a number of different aspects of their lives yet may wish to live independently and therefore the market place needs to take account of this change. The number of houses for affordable housing or social housing must be of a higher volume than what currently is achieved to meet this changing need.</p>	<p>Comments acknowledged on the importance of affordable and other specialist housing, and the need for up-to-date evidence. Affordable housing can be defined in a glossary if necessary.</p> <p>Comments on the affordable needs of younger people are acknowledged; it is agreed that there is a need for suitable means for such people to get on the housing ladder, recognising difficulties, e.g. with securing a mortgage.</p>

ID	Representor Comments	Council Response
95	<p>4.11 DWH supports the delivery of new affordable homes and welcomes the various options which have been identified by WLBC. There is, however, no one-size-fits-all approach which will be suitable for every site or market area, or which is capable of meeting the Borough's full affordable housing need. WLBC should therefore continue to explore the use of several varied approaches.</p> <p>4.12 Notwithstanding, DWH acknowledges that the provision of market dwellings is likely to remain the principal means by which affordable homes are provided. In this regard, DWH highlights that:</p> <ul style="list-style-type: none"> • An affordable housing target in the Local Plan Review should not be established at a level which would compromise the viability of development and must for similar reasons incorporate viability. This is a key principle of the NPPF, which states that "...To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing...should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable..." (paragraph 173). The 35% affordable housing target established by Policy RS2 of the current Local Plan has on occasion threatened the viable delivery of development. WLBC must therefore assemble a robust evidence base in respect of viability for the Local Plan Review. • Development of market housing in areas of high demand could contribute towards the delivery of infrastructure or affordable homes in regeneration areas, via off-site financial contributions (see above). DWH would welcome a discussion with WLBC regarding the feasibility of such an approach, mindful of the legal and financial mechanisms available. 	<p>Comments noted; it is agreed a "one size fits all" solution is unlikely. The Local Plan, including affordable housing targets, will be viability-assessed. Provision for off-site housing can be considered as policy options are drawn up.</p>
96	<p>The critical objective must be to deliver more affordable housing to fulfil unmet needs. This should be seen in the context of delivering genuinely affordable housing, and also to deliver more market housing of appropriate formats to address the supply-side issues and therefore improve affordability ratios towards more sustainable levels. Clearly there could be myriad approaches to achieving those critical objectives.</p> <p>We conclude that the Council should give itself the opportunity to deliver housing in the early part of the Plan period in areas where market signals are positive. Those areas will also provide a stronger opportunity to deliver affordable housing as part of an appropriate development mix and mitigate the pressing supply-side issues facing West Lancashire.</p> <p>It would also be appropriate to afford strong planning weight to development schemes which can deliver strong contribution to affordable housing requirements, including those that would deliver more affordable housing than would be required by a strict application of policy. This approach is not necessarily consistent with any of options 1-4 so we would suggest that those options should not be taken forward.</p> <p>We conclude that within options 5-8 there is an implied recognition that there is a need to deliver more affordable housing and indeed more market housing which is within the reach of the local housing market, and that weight can be afforded to the realization of this key planning objective.</p> <p>We think it more important to recognize the weight that should be afforded to the delivery of affordable housing, rather than expressly committing to one of the four preferable options (5 to 8) which may pre-suppose and prejudice the delivery of affordable housing which would be a regrettable unintended consequence.</p>	<p>Comments noted on preference between options. It is agreed that schemes that provide the full amount of affordable housing required by policy are generally welcome (subject to other factors), and that if the amount is exceeded, this should count as a positive .</p>
97	<p>St. Modwen make no specific comment in these respects</p>	<p>-</p>
99	<p>Our Clients are supportive of the provision of affordable housing however, the most appropriate method is to undertake an approach which includes the "usual" approach to affordable housing, and for this to be based on a broadly similar approach to the existing relating to geographical variation. In applying this method, consideration does however need to be given to the Government Ministerial Statement which confirms that on schemes of</p>	<p>Comments noted. The Council already uses the national threshold for affordable housing and will continue to have regard to this. A 'blanket' approach (over the threshold) is now advocated in the draft new NPPF. Consideration can be given in</p>

ID	Representor Comments	Council Response
	<p>less than 10 dwellings, no affordable housing provision is required, therefore a “blanket” percentage requirement approach would not be feasible. Consideration should also be given to off-site provision in terms of a financial contribution, when tested through a Viability Appraisal. The ideal mixture of approaches would be a hybrid of Options 2, 3 and 4. It is noted that Options 5 and 6 refer to affordable housing schemes. Rural Exception Schemes are supported through Paragraphs 54 and 89 of the NPPF and the emerging Local Plan should support Rural Exception Sites in principle. Consideration should also be given to the Housing White Paper which seeks to amend the definition of affordable housing, as set out in the NPPF, to include lower cost housing.</p>	<p>the emerging policies to off-site affordable housing, and to rural exception sites. The Council will have regard to the revised definition of affordable housing in the draft NPPF / Housing White Paper.</p>
107	<p>The provision of high quality affordable housing should be viewed as the social responsibility of national and local governments who must take the lead in identifying exactly what is required, where and when. They should then drive the construction/provision of such accommodation to meet those needs.</p> <p>As long as the 'problem' is left to profit motivated developers to resolve it will not happen (as the current shortage evidences). More radical solutions are needed which may involve local authority actually financing constructing and managing this but partnership s at different stages could also be an option.</p>	<p>Comments noted. Option 2 refers to the possibility of the Council building housing itself.</p>

Question 28: Do you have an interest in building your own home? Which of the above policy options for self and custom build housing do you think would help you to built your own home? Why?

ID	Representor Comments	Council Response
1	Option 3 yes we have land half an acre in ***** next to my wife's parents house.my wife was born in ***** yet can't afford to buy a home there.we put in for planning some years ago.but were refused due to the national planning framework there were no objections from local people	Noted
2	Option 3 find the need and act upon it in all of west Lancashire	Comments noted
9	Option 1 how is it the councils problem?	Noted. The local authority is required by law to gauge demand for self and custom build, and to provide plots where there is evidence of demand.
14	no	-
18	no comment	-
20	Some interest expressed in building own home. Option 3: Identify and allocate small sites for SCB dwellings in line with demand. - To bring Local Policy in line with neighbouring boroughs.	Comments noted
21	No	-
23	Option 1. This should be down to the individual not a council policy	Noted. The local authority is required by law to gauge demand for self and custom build, and to provide plots where there is evidence of demand.
24	I do not have an interest in building my own home. Option 1	Noted
26	Option 3 - - Self build is wonderful!	Noted
28	Option 3	Noted
30	I had an interest in self build when younger but could not obtain a plot of land. I support Option 3 for those with the energy and youth!	Comments noted
31	Option 2 may bring some well needed diversity to otherwise 'cookie cutter' developments.	Comments noted
32	Whilst I have no interest in building my own home. I think option 2 is probably the best option as it will give some diversity to developments which can often be bland and samey.	Comments noted
35	The consideration by the Council of the need for self-build plots is supported, however it is necessary to recognise that only a small number of residents have registered as wanting such a plot. Therefore, it would not be appropriate for the Council to seek to specifically address this within emerging policy. Instead flexibility should be included within the Plan to allow for the provision of such sites should demand for self-build plots increase and a greater need be recognised during the Plan period.	Noted. The local authority is required by law to gauge demand for self and custom build, and to provide plots where there is evidence of demand. It is considered prudent to have a policy to cover self-build, even if numbers on the Register are currently low. As suggested, this could be flexible, allowing for plots / sites to be provided should demand increase.
39	Response A: Option 3	Noted
42	We have no comment at this time.	Noted

ID	Representor Comments	Council Response
46	<p>Option 3. although Option 2 could have some merit in terms of shared costs of infrastructure.</p> <p>Option 3 could provide a meaningful contribution to housing numbers whilst enabling a greater number of people to obtain their own home.</p>	Comments noted
47	<p>Either option 2 or 3 sounds good to me. How about sites with more relaxed planning rules to that people could put up a yurt or whatever.</p>	<p>Comments noted. Careful thought would need to be given to relaxation of planning rules, in order to ensure that housing provided does not detract from or have an unacceptable impact on the character and appearance of the local area.</p>
48	<p>Option 3 gives borough wide flexibility and overview for allocation of appropriate sites allowing for certainty of demand and be flexible enough to allow for windfall applications.</p>	Comments noted
58	<p>The HBF would not support a policy requirement or the setting aside of parts of allocations for SCB. Our reasoning is two-fold, firstly as noted by option 1, there are currently low indications of demand from the Council's SCB Register. The justification for setting aside land, or requiring a percentage, would therefore be difficult. In addition such an approach could have potential implications for the viability and delivery of sites which the Council is reliant upon to deliver its housing needs.</p> <p>The HBF would therefore support option 3, which provides a limited number of smaller sites specifically aimed at SCB. This approach could be supplemented by a permissive policy approach to future windfall SCB sites. The quantum of such allocations would need to be justified by the Council's evidence. It is also recommended that if such sites fail to be brought forward policy mechanisms are put in place which enable these sites to be delivered by the market.</p>	<p>Comments noted, both with regard to Option 2 and deliverability, and with regard to Option 3 and flexibility.</p>
61	<p>Option 1 - there should not be a need to allocate specific sites for SCB housing, but rather the Council should be open to planning applications for this type of property on a case by case basis.</p> <p>By the nature of these type of projects they are likely to be for one, maybe 2 dwellings per site and so should be judged according to location, the ideas for the site and whether the design is suitable for the properties in the immediate vicinity (height, style, materials etc)</p>	<p>Comments noted. It is agreed that proposals for self-build housing should meet design criteria, as is the case for other types of housing.</p>
63	<p>Encourage people to build their own houses, not houses built by big companies who extract wealth from the area.</p>	<p>Comments noted; this is one of the reasons for the promotion of self-build housing.</p>
64	<p>No comment.</p>	-
66	<p>Should the WLLP include a policy in relation to self-build housing it is important that the development industry is able to understand the implications of any such policy requirement, to assist with the design of schemes and the consideration of financial viability.</p> <p>Gladman recommend that any policy requirement in relation to self-build housing has an element of - flexibility built in to allow for negotiation over self-build plots on the basis of viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include selfbuild plots should be tested through the Council's viability assessment of the Local Plan policies to ensure that the cumulative impacts of all proposed local standards and policy requirements do not put the implementation of the plan as a whole at risk.</p> <p>Further to this, Gladman would urge the Council to ensure that any self-build policy has added flexibility as there is no guarantee that these units will be delivered (such as the lack of interest from local community members) and there may be situations when they are difficult to deliver which may result in the non-delivery of otherwise sustainable land for housing. Therefore, Gladman recommend that any policy specific requirement needs to include a mechanism whereby if the self-build plots are not taken up within a given time period then these will revert back to</p>	<p>Comments noted. If a policy requirement (presumably to include a percentage of self-build plots on general housing sites) were included in the Local Plan, it should be clear to developers what its implications will be. Any such policy would be viability tested as part of the Local Plan viability assessment. Consideration to flexibility can be given if such a policy were to be implemented.</p>

ID	Representor Comments	Council Response
	market housing to be provided as part of the wider scheme. This would provide flexibility and help ensure that the required housing is delivered.	
70	<p>Whilst Central Government are encouraging local authorities to consider self and custom built housing when formulating Local Plans (through the Housing and Planning Act 2016), any policy put forward on this basis would still need to be based on robust and up to date evidence and pass the tests of soundness outlined in the NPPF.</p> <p>The paper outlines that currently there are fewer than 20 people within West Lancashire who have registered an interest in a self or custom build house. On this basis, we believe currently there is insufficient evidence to have a policy within the Local Plan Review to compel developers to provide plots for self or custom built homes.</p> <p>Instead the Commissioners would advocate a policy which can facilitate self or custom build plots as and when demand for them arises. This would permit such development but would not require specific allocations or portions/plots of specific allocations to be given over to self or custom build homes.</p>	Comments noted; any Local Plan policy needs to pass the tests of soundness and be based on evidence. It is agreed that a policy approach that can respond to varying demand for SCB housing would be prudent.
72	I have a huge local demand for this particularly around Wrightington Bar but the clients land is brownfield land in green belt and currently restricted. this needs to change to meet the demand and growth.	Comments noted.
73	No comments.	-
77	No interest personally.	-
78	Non personally. Always encourage environmentally sustainable buildings.	Comments noted. Self and custom build homes offer good opportunities for sustainable design.
80	There is a need for accommodation for adults with learning disabilities, something more special than lifetime homes would provide. Current provision tends to be limited to segregated settings where care and housing are provided together. This does not fit with REACH standards and is well below good practice in social care. I would like small sites to be allocated in key locations that are easy for staff to get to (keeps costs down if staff dont need to drive and disabled person does not need car at all times also affects number of parking places needed) Parking crucial - LCC service manager reports that issues regarding parking are cause of complaint in supporting living tenancies. This is real issue - figures do not show up on housing statistics because system of having access to a social worker who would make referral is not always available now.	Comments noted. (First sentences generalised for Data Protection purposes.) This is a specialist housing need; Local Plan policies should support applications for such housing in suitable locations.
82	<p>Option 2: Set aside parts of larger allocated housing sites for SCB plots</p> <p>Option 3: Identify and allocate small sites for SCB dwellings in line with demand</p> <ul style="list-style-type: none"> - These must be for Genuine SCB, not volume housebuilders giving options to buyers - The contribution SCB can make to a vibrant local economy should not be underestimated. 	Comments noted. At present, the national definition of SCB housing is wide, and includes properties built by volume housebuilders with specific elements chosen ('customised') by the purchasers. It is agreed that provision of SCB housing can contribute to the local economy.
84	Persimmon Homes do not consider that there is requisite demand for Self Build Plots to justify setting aside portions of allocations for this purpose. The Council's own register indicates that levels of demand are low, and as such any specific allocations for self build should be warranted by the evidenced need. Flexibility is supported to enable self build delivery where demand exists rather than precluding market led development.	Comments noted. Support for flexibility is noted.
87	Providing land for self and custom built housing may provide a route for special needs housing as well as for builders who wish to create something out of the ordinary. During the lifetime of the present local plan, examples of bespoke housing have been few: it is anticipated that this would raise the overall attractiveness of areas and provide opportunities to raise the bar on design. Options 2 and 3 are acceptable, but Option 1 is unlikely to be successful as it has not been successful to date.	Comments noted; it is agreed that self and custom build housing can provide a route for special needs housing. Comments on options noted.

ID	Representor Comments	Council Response
90	<p>I am writing on behalf of the Maharishi Golden Dome in Skelmersdale and would like to congratulate the Council for improvements in West Lancashire in recent years. The changes that have taken place during the 37 years that I have lived in Skelmersdale have been very noticeable. Our organisation and many of our members are very interested in a self-build development for individual homes, purpose built visitor accommodation for many hundreds of people who visit the Dome from across the country and mainland Europe every year for meditation holidays and an additional educational facility for local residents who learn Transcendental Meditation.</p> <p>We would be delighted if policies informing land use in West Lancashire enable our organisation to expand and contribute more to the local community. In addition to benefitting the local economy, there are wider societal benefits created by large numbers of people practising Transcendental Meditation and its advanced programmes together in a group. This is particularly the case when the group is of a certain size and is permanent. There is a large body of scientific research supporting this. See: www.goldendome.org.uk/meditate/maharishi-effect</p> <p>The Maharishi Golden Dome offers a variety of educational programmes that are hugely beneficial for business, industry, health and the environment. One programme known as Maharishi Vastu is about how to use land and orientate buildings to use sunlight in a way that creates good health, coherent thinking, peace of mind, creativity and longevity. We are interested in the Garden City concept and also using the principles of Maharishi Vastu. This requires land that meets specific criteria. We are in the process of looking for suitable land within five minutes' drive of the Dome.</p>	<p>Comments noted. There is not considered to be a need for a bespoke policy / site allocation for the MGD in the Local Plan, but development associated with it could be proposed via planning applications on suitable policy-compliant sites within the built-up area.</p>
96	<p>AIUH makes no substantive comment on this matter, other than to say that if Government guidance is suggesting that such an approach is encouraged then it would seem entirely appropriate to follow that approach unless there was strong local evidence to the contrary.</p>	<p>Comments noted</p>
97	<p>St. Modwen makes no comment on this matter.</p>	<p>-</p>
99	<p>No comment.</p>	<p>-</p>

Question 29: Do you have any interest in living in a caravan / park home or house boat / canal barge? Which of the above policy options do you think would best ensure the right amount of pitches or berths are made available for caravans and house boats? Why?

ID	Representor Comments	Council Response
1	Option 3 would be more flexible a lot of people are downsizing And cashing in on there property value. a lot of caravan sites are lived on full time	Noted
2	Option 2 caravan sites are more popular now as people downsize	Comments noted
9	Option 1	Noted
14	no	-
18	no comment	-
20	Option 2: Allocate new sites, or land on the edge of existing sites, for additional caravan-based accommodation or mooring berths. - Possible future release of equity in current houses.	Comments noted
21	No	-
23	Option 2. Expanding existing sites is least bad option.	Comments noted
24	I have no interest in living in a caravan, park home or house boat/barge. I would opt for Option 1	Comments noted
26	Option 1	Noted
28	Option 1	Noted
30	I have no interest in now living in any of the alternative accommodations listed though I started converting a narrow boat for residential use when young but abandoned the idea because of the difficulty of finding a permanent residential mooring, among other factors. You must consult with the Canals and River Trust to ascertain their current policy on licencing and permanent moorings. Permanent residential moorings need the facilities found in marinas. So Option 3 is preferred for boats. Traveller spaces should be provided within existing caravan parks	Comments noted; it is accepted that any policy on residential moorings needs to be drawn up in consultation with the Canal and River Trust, and that facilities provided at marinas (e.g. pump out) are important for boat dwellers. Comments on Traveller sites noted.
31	Allocated sites may suffer local resident opposition. Option 1 is unlikely to deliver any sites. Not sure what my preference would be. (1 or 2, not 3)	Comments noted
32	I have no interest in this style of living, however I do understand that people choose theses lifestyles, I therefore think Option one would be preferable	Comments noted
39	3.As above vary local green belt policy on a site-specific basis. Response A : Option 3	Noted
42	We have no comment at this time.	Noted
46	Possibly a mixture of all three Options. Certainly a range of alternative lifestyles can help with the desire to downsize from mortgage free home ownership in order to release capital to fund an alternative active way of living which would in turn 'free up' residential property for the wider community.	Comments noted, including the point about freeing up 'mainstream' properties.
47	I would like to live in a yurt or some basic type of accommodation. People are homeless, but it is not permissible to build a cheap house! Also, make it possible for people with rural livelihoods to live on the land.	Comments noted. It should be possible to build a cheap house, but in an appropriate location (as governed by national and local planning policy). Unfortunately, given constraints, land values are an issue.

ID	Representor Comments	Council Response
48	Option 3 allows for flexibility from national guidelines allowing appropriate development in line with identified needs whilst maintaining protection of the Green Belt.	Comments noted
61	Option 2 would seem the most appropriate option to meet the demand for this type of housing	Comments noted
64	No comment.	-
72	I have demand for Park Homes in the Chester area for ex pats who have sold houses in the UK to move abroad but need to return due to Brexit worries over health care etc. I feel sure that demand could be replicated in West Lancashire if required by the Council.	Comments noted.
73	No comments.	-
77	No interest personally but if sited in suitable locations hopefully would encourage more trade etc into the area.	Comments noted
78	No interest personally. If sited in suitable non disruptive location can be managed and bring in trade to an area.	Comments noted
82	Option 1: Allow for caravan or houseboat accommodation to come forward as the market demands. Do not vary the Green Belt policy - it is under enough threat!	Comments noted. Potential to vary Green Belt policy within a Local Plan is very limited in any case.
87	Caravans and boats may provide additional low cost homes for some. There is concern that a policy which encourages this may reduce opportunities for holiday homes in areas where the visitor economy is growing. There is concern also that all housing should be of a high standard whether your home is a caravan or boat, or bricks and mortar. Burscough is a key shopping destination for those who use the canals, as it's either the first or last stopping point for shopping on the way to and from Liverpool, I therefore believe there is a need for a Marina for canal boats.	Comments noted. It is agreed that the visitor economy is important and should not be undermined. It is also agreed that all housing should be of a high standard. In terms of a marina at Burscough, an interesting point is made. One important factor is whereabouts a marina could be located in this area.
96	AIUH makes no comment on this matter.	-
97	St. Modwen makes no comment on this matter.	-
99	No comment.	-

Question 30: Which policy option for addressing the issue of relative market weakness in Skelmersdale do you think is the most appropriate? Why?

ID	Representor Comments	Council Response
1	Skelmersdale has been over developed the council has got tunnel vision on this matter	It is not considered the town has been over-developed. Skelmersdale was originally planned for a significantly higher number of residents.
2	Leave Skelmersdale now it is time to move on to other areas	Noted; it is not agreed that Skelmersdale should be 'left'.
9	You cant REgenerate something that was never there in the first place! You need to start from scratch and create something of enough originality and appeal to overcome the reality of that places entire (albeit limited) grim history.	Comments noted
14	option 2...an impetus is required	Noted
18	no comment	-
20	2) Base the Local Plan Review strategy on the regeneration and expansion of Skelmersdale. Prime location for expansion and development.	Comments noted
23	1. Improving what already exists is the best approach. Just expanding an already impoverished area will only make it worse.	Comments noted
24	As previously stated, I consider Skelmersdale in dire need to help from the local council. Option 2	Comments noted
26	Option 2	Noted
28	Policy requirements should not be relaxed. Market weakness provides housing for people on low incomes.	Comments noted; it is important that housing be provided for people on low incomes, but such housing needs to be of an acceptable design and quality.
30	Please see comments made in response to affordable housing. larger houses for second and third time buyers should be provided to continue the existing owner/occupation houses on the Eastern boundary of the built up area.	Comments noted; as above, it is agreed that a mix of housing types, including larger houses, in Skelmersdale (and elsewhere) is desirable.
31	Option 2. - Don't relax policies, developers need firm boundarys	Comments noted
32	Option 2 supporting regeneration and expansion of Skelmersdale is the way the Local Plan Review should go.	Comments noted
39	Option 1. Continue to relax or further relax policy requirements for housing sites in Skelmersdale exemption from CIL open space contributions. Response A: Option 1 Option 2 Base the Local Plan review Strategy on the expansion of Skelmersdale and set up a council/formed development company. Responses B & C Option 2 - Responses B&C are based on the rationale that the WLBC could be freed from the developer led economic constraints on development and that an approach based on perceived strategic and social planning could be implemented.This will be more compatible with the future Liverpool deep port and the M58 corridor vision for development.	Comments noted. The possibility of the Council forming a development company is mentioned in paragraph 2.24 of the Social Options Paper.
42	Clearly we would not wish to see any relaxation in policies protecting,	Comments noted. Whilst this option does

ID	Representor Comments	Council Response
	restoring and enhancing the functionality of Skelmersdale's ecological networks and the ecosystem services provided to employees, businesses, resident and visitors by established, restored and new green infrastructure. The regeneration and expansion of Skelmersdale could offer opportunities for net gain in the functionality of ecological networks and in the availability of ecosystem services provided by green infrastructure; or it could threaten these. However, "the devil would be in the detail". We look forward to a draft masterplan and / or a Supplementary Planning Document on the topic.	not envisage relaxation of any nature conservation-type policy, it is accepted that to relax open space requirements could, in certain cases, lead to a less efficient function for wider networks of green space. If policy on provision of open space were to be relaxed, careful thought would need to be given to the possibility of such 'side-effects'. As stated by the Representor, development could also provide opportunities to improve green infrastructure and ecological networks.
46	Definitely Option 2. because a comprehensive approach is needed in order to achieve a step change in the perception of Skelmersdale which has enormous potential in terms of becoming a desirable and much sought after location to move to and to be a township of strategic importance within the North West.	Comments, including aspirations for the town, are noted.
47	WLBC talks about how money is being 'leaked' from the area in terms of retail and night time economy. But who was it that gave planning permission for all those dormitory communities? I think option 2 is good.	Comments noted
48	Option 1 should be followed but with additional points to ensure that wider community benefits are included. Option 2 would rely on a very professional Development Company that was run efficiently. The track record for a council to have the ability to run such an efficient and successful enterprise has yet to be proven.	Comments noted; it is agreed that wider community benefits should be sought, were option 1 to be pursued.
57	See above comments	Noted
61	Option 2 because it would help to strengthen the housing market in Skelmersdale, and the regeneration will, over time, automatically increase developer interest in building properties in the area.	Comments noted
64	<p>The Local Plan should be aspirational and ambitious and should help to realise and achieve the potential of Skelmersdale. This is to ensure that it helps to fulfil its aspirations which were set out in its role as a Regional Town. We consider that with the proposed level of investment in terms of housing and employment that this will help to create a catalyst to development which will help to address the existing market weaknesses within Skelmersdale.</p> <p>Our Clients consider that Skelmersdale is a suitable location for development, and the land to the west of the settlement is an appropriate location for both residential and employment uses. We consider that one method to help address the market weaknesses of Skelmersdale is to release Green Belt sites around Skelmersdale in a more attractive location. Our Clients would support the relaxation of CIL and developer contributions, when assessed through a Viability Appraisal.</p>	Comments noted
67	We suggest a combination of these options. Skelmersdale should be promoted as a housing destination of choice - housing growth underpins regeneration and expansion through investment and through household expenditure.	Comments noted
72	The existing policy is a disaster economically for the Borough. If you can relax policy in Skelmersdale then why not relax it in Wrightington?	Comments noted. Skelmersdale has markedly different characteristics from Wrightington, hence the difference in approach.
73	No comments.	-
75	In preparing the Preferred Options Paper policy for the Skelmersdale housing market, consideration should be given to not just the delivery of housing but to how the necessary provisions and infrastructure (e.g. affordable housing, open space, community and health facilities, education,	Comments noted. It is agreed that accompanying infrastructure should be a key element of any housing growth, that communities should be sustainable and well-

ID	Representor Comments	Council Response
	<p>and transport) will be provided in order to create sustainable communities in accordance with the requirements of National Planning Policy Framework. Any potential positive and negative impacts of new housing developments on existing residents should also be taken into account. A housing policy for Skelmersdale should therefore seek to ensure that new and existing communities are provided with access to essential facilities and services and that any planning relaxation should guard against creating unsustainable and poorly connected communities.</p> <p>It is recommended that consideration is also given to alternative ways to incentivise the housing market in Skelmersdale, in addition to options to relax/further relax policy requirements for housing sites in Skelmersdale. For example, streamlined planning procedures can also influence the housing market. Measures to encourage and incentivise landowners and the commercial development market to engage and partner local authorities in collective efforts to assemble and deliver accelerated rates of development would be particularly welcomed, and the incentive of streamlined 'fast track' planning arrangements (e.g. Local Development Order for Skelmersdale) could serve that purpose well.</p>	<p>connected, and that impacts on existing residents need to be taken into account. It is also acknowledged that there are incentives other than policy relaxation that can boost housing delivery. The Council has already prepared 3 LDOs in Skelmersdale.</p>
77	To upgrade existing properties and develop different levels of new homes.	Comments noted; it is agreed that different types of new homes are desirable in Skelmersdale.
78	To upgrade an develop properties of variable types and prices in most of the town maintain town centre and recreational facilities	Comments noted; it is agreed that a range of property types in Skelmersdale would be desirable, and that it is important to retain existing facilities.
79	<p>Social Policy Issue 4: The Skelmersdale housing market considers the special measures which could be put in place in order to try and assist the delivery of regeneration in Skelmersdale</p> <p>Story Homes has already set out above its view of the market in Skelmersdale and does not therefore repeat them here. Story Homes is clear however that the Council should not place unreasonable reliance on Skelmersdale to deliver the Borough's housing need. The options below set out how the Council considers it could address the challenges in Skelmersdale</p> <p>The relaxation of obligations such as affordable, CIL and open space requirements would improve the viability of development, however even significant relaxations cannot always compensate for the state of the housing market and where greatest demand lies. Story Homes considers, as previously detailed, that relaxation on affordable requirements is acceptable here given the amount of affordable properties already available. Relaxing other requirements can have negative connotations and must be very carefully considered. For example, reducing CIL obligations could prevent the delivery of significant infrastructure schemes, such as the new train station; the relaxation on open space requirements could serve to limit improvements to the existing setting and character of the town to the extent that the market will be even less likely to improve. Story Homes accepts therefore that affordable requirements should continue to be relaxed, but would urge great caution with further relaxations because of the potentially negative outcomes that could result.</p> <p>As set out previously Story Homes considers this approach (similar to Scenario 4 of the - Strategic Development Options) is fraught with difficulty and other more attractive market areas, which much greater prospects of delivery should make a reasonable contribution to meeting the Borough's housing needs. Scenario 2 of the Strategic Development Options is considered much more appropriate. Story Homes supports the principle of an affordable housing policy, provided it is subject to viability considerations. It considers that policies relaxing affordable requirements in Skelmersdale are appropriate, but urges caution applying additional relaxations.</p>	<p>Comments noted, in particular with regard to relaxing affordable housing requirements but not others. Affordable housing requirements are already less in Skelmersdale than elsewhere; also CIL is not chargeable in much of Skelmersdale. Open space comments acknowledged. The Council is aware there are more attractive market areas elsewhere in the Borough, but Skelmersdale is the highest 'ranked' town in the Borough, hence this policy objective to boost its housing market.</p>

ID	Representor Comments	Council Response
82	<p>2) Base the Local Plan Review strategy on the regeneration and expansion of Skelmersdale</p> <p>Skelmersdale has the potential to be much improved, there is already the infrastructure for more housing, but it needs investment, improved public transport etc.</p>	<p>Comments noted; it is agreed Skelmersdale needs more investment.</p>
87	<p>Burscough Parish Council supports policy option 2 which is to base the local plan review strategy on the regeneration and expansion of Skelmersdale. Skelmersdale needs our support to develop to its full potential.</p>	<p>Comments noted</p>
88	<p>I live and work in Skelmersdale and some new and better planning is essential if we are to have a thriving town and surrounding area. Housing Developments should attract a variety of different people, from those with social housing needs, those wanting to start businesses and maybe work at home and the managers and owners of businesses. The town needs to attract a wider range of businesses with more highly skilled employees. Work needs to be integrated with housing where possible. At present a working couple need two cars, then their adult children some more. Also a good transport network is essential.</p> <p>Again in Skelmersdale housing development should be as near the town centre as possible. Social housing in particular needs to be near large shops. A town centre needs to be developed in Skelmersdale, not just a retail park. A proper town centre will allow change and innovation by encouraging small businesses and shops with appropriate and affordable facilities. Proper attention should be paid to encourage green space and maintain the green belts where ever possible.</p> <p>Vitally Skelmersdale needs a Town Council to put its interests first.</p>	<p>Comments on attracting a range of businesses / skills, the need for a successful town centre, public transport and green space acknowledged. It is agreed that housing should be linked to work, and that a range of properties for different types of occupant should be provided.</p>
95	<p>4.17 As our representations in Chapter 3 illustrate, while DWH supports the regeneration of Skelmersdale it has concerns about the ability of the town to successfully deliver a significant amount of housing. The current Local Plan planned for Skelmersdale to deliver upon the 'lions share' of the borough's housing requirement which continues to largely be undelivered. The current development strategy cannot be continued. A balance has to be struck between the regeneration of the town and a realistic housing requirement which can be delivered.</p>	<p>Comments noted; the reason for this policy option is to seek to boost housing delivery in Skelmersdale.</p>
96	<p>The second option is effectively a continuation of the existing policy which has not proved successful, owing to the weak housing market in Skelmersdale and under-delivery of other allocated sites.</p> <p>Taking forward housing allocations based upon Spatial Areas may provide greater opportunity for the Council to realise its development aspirations by firstly taking advantage of market signals in areas such as Up Holland, and then later in the Plan period awaiting improvement in the Skelmersdale housing market upon delivery of the Skelmersdale town centre scheme.</p>	<p>Comments noted and acknowledged. It is agreed that delivery of a viable town centre for Skelmersdale should improve the housing market there. However, it is considered that housing development should not be 'held back' (or, at least, not 'boosted') in the town until the town centre is delivered; the two go hand in hand.</p>
97	<p>St. Modwen is supportive of the Skelmersdale Spatial Area which may provide greater opportunity for the Council to deliver against Plan-led objectives early in the Plan period by firstly taking advantage of specific sub-areas within it which enjoy more positive market signals. It will follow that later in the Plan period there should be an opportunity to deliver housing in Skelmersdale, awaiting improvement in the local housing market upon delivery of the Skelmersdale town centre scheme.</p> <p>The current policy position is supportive of development in Skelmersdale, so if there is opportunity to relax policy requirements on a spatial level that is likely to catalyse the delivery of housing in Skelmersdale more quickly, once market signals begin to improve.</p>	<p>Comments noted. It is considered that housing development should not be 'held back' (or, at least, not 'boosted') in the town until the town centre is delivered; the two go hand in hand.</p> <p>Option 1 is concerned with relaxing policy within [much of] Skelmersdale only, not the whole Skelmersdale and South Eastern Parishes spatial area.</p>
99	<p>The Local Plan should be aspirational and ambitious and should help to realise and achieve the potential of Skelmersdale. This is to ensure that it helps to fulfil its aspirations which were set out in its role as a Regional Town. We consider that with the proposed level of investment in terms of</p>	<p>Comments noted. If development were to be proposed/ planned west of the town, careful consideration needs to be given as to how such development can benefit existing</p>

ID	Representor Comments	Council Response
	<p>housing and employment that this will help to create a catalyst to development which will help to address the existing market weaknesses within Skelmersdale.</p> <p>Our Clients consider that Skelmersdale is a suitable location for development, and the land to the west of the settlement is an appropriate location for both residential and employment uses. We consider that one method to help address the market weaknesses of Skelmersdale is to release Green Belt sites around Skelmersdale in a more attractive location. Our Clients would support the relaxation of CIL and developer contributions, when assessed through a Viability Appraisal.</p>	<p>areas of the town, especially those subject to deprivation issues.</p>

Question 31: Which policy options for the approach towards the social requirements of older people do you think is the most appropriate for the Local Plan? Why?

ID	Representor Comments	Council Response
1	Option 1 we feel would be better	Noted
2	Option 2 were there are services are there or close about allow this	Comments noted
9	Option 1	Noted
14	option 1....policy can be reviewed then	Noted
18	<p>We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages both the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation and a requirement for homes to be built to a standard that is suitable for the elderly, or easily altered to be suitable for the elderly, such as M4(2) or M4(3) of the Building Regulations. The latter requirement would be more deliverable for conventional house builders and achievable by the mechanisms currently proposed in Policy LP7 (i.e. a 10% requirement on all sites).</p> <p>The delivery of greater volumes of dedicated specialist housing could be aided by a more positive legislative framework.</p> <p>In light of the above we recommend that consideration is given to the advice provide in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit. This toolkit was developed by a consortium of private and public organisations with an interest in housing for the elderly, led by McCarthy and Stone, and encourages a joined up approach to planning, housing and social care policy both in the collection of evidence and the development of specialist accommodation for the elderly. It proposes the following policy wording:</p> <p>“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.</p> <p>The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the ‘Lifetime Homes’ standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.</p> <p>The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”</p> <p>Thank you for the opportunity for comment.. -</p>	<p>Comments noted. It is agreed that a combined approach of specialist developments for the elderly, as well as adaptable 'mainstream' homes is a good approach towards addressing the need for accommodation for the elderly.</p>
20	<p>Option 1: A general ‘sustainable development’ policy which directs new development to places where services and facilities are available.</p> <p>'Older people' wherever possible should be able to remain in and involve themselves in local communities.</p>	<p>Comments noted. It is agreed that, as a general principle, older people should be able to remain in their local communities.</p>
21	A good bus service.	Noted
23	Option 1. Older people should not be "shipped off" to new developments away from their homes and families.	<p>Comments noted. It is agreed that, as a general principle, older people should be able to remain in their local communities. However, some may choose to move to purpose-built developments, so such schemes should not be disregarded.</p>

ID	Representor Comments	Council Response
24	I am an older person and appreciate the difficulties that come with ageing. I would opt for Option 1 as it is important that health, transport and consumer facilities are readily available for older people	Comments noted; it is agreed that there should be good, easy access to services and facilities for older people.
26	New housing should be designed for all age living there was good design guidance came out in the mid noughties which was very helpful	It is agreed that houses should be able to accommodate any age of occupant.
28	Any policy needs to be flexible.	Comments noted
29	OPTION 2 ALLOWING THE DEVELOPMENT OF A RETIREMENT VILLAGE.	Comment noted
30	A combination of Options 1 and 3 may work. The problem in Skelmersdale is that facilities such as bus services are being withdrawn making travel for the elderly without cars difficult, even for supermarket shopping. Many needs are met by LCC and the NHS. I would not force the elderly in rural areas to move to towns.	Comments noted. It is agreed that, as a general principle, older people should be able to remain in their local communities, although some may choose to move to towns, e.g. for ease of access to necessary services.
31	Option 1	Noted
32	Council needs to ensure existing aging populations can, if they wish, remain in their communities with provision of specifically adapted and accessible properties, however I do not feel special developments for the elderly are a good idea as they risk ghettoizing an aging population.	Comments noted. It is agreed that, as a general principle, older people should be able to remain in their local communities. However, some older people are happy to move to specialist developments and, as such, these developments can be provided.
39	Option 2 .Allocate specific sites in appropriate locations for services facilities similar to option 1. Response A: Option 2	Comments noted
42	We have no comment at this time.	Noted
46	Option 3. because a new approach is needed in order to cater for the future needs of a growing section of the community. There is an insufficient range of suitable types of development in the main mix of housing, over reliant upon specialist developments which tend to be more exclusive. 'Gated' or closed communities should be resisted as they are divisive and lead to lack of cohesive community relationships.	Comments noted. It is recognised the ageing population is a growing section of the community, and that a variety / range of accommodation will be required from them. Whilst it is agreed that the elderly should / should be able to live amongst the wider community, some may choose to live in age-restricted developments, so there is a place for them in addition to other types of housing.
48	Option 3 should be adopted as it includes 1 and 2 as it is more flexible.	Comments noted
57	Housing and other accommodation for the elderly should be incorporated within market housing in sustainable locations.	Comments noted; it is agreed that housing for the elderly (in fact, all housing) should be located in sustainable places wherever possible. In general it is good to mix housing for the elderly with 'mainstream' housing.
61	Option 1- a general sustainable development policy to ensure a mix of the right type of housing, rather than as often happens , developers putting forward plans to deliver only 3/4 bedroom family accommodation. Housing for the elderly should be within the community to prevent isolation and be within easy access of public transport, shops , doctors etc. Within the Borough it may encourage development of housing for the elderly if a small number of specific sites are identified specifically for assisted living for the over 55s. This will be an important sector as a significant increase in the aged population is predicted in the forecasts to 2037	Comments acknowledged; it is agreed that there is a need to deliver smaller properties suitable for older people to downsize into, that older people should be able to live within the community, that accommodation for older people should be within easy reach of services, and that there is a place for 'assisted living' schemes.
64	No comment.	-
69	Option 1 with 2 and 3 as support (though not assuming 'very large new developments' are needed)	Comments noted

ID	Representor Comments	Council Response
70	<p>The current evidence base supporting the Local Plan, suggests an ageing population and so this paper seeks ideas on how the requirement of older people can be met.</p> <p>Key to this will be accessibility both in terms of housing and for wider facilities and services. In terms of the former, current building regulations require certain standards for housing to allow them to be accessible for elderly people, whilst for the latter point, the overall approach to sustainable development which should run through the entire Local Plan Review should ensure housing allocations are provided in sustainable locations with access to important services and facilities.</p> <p>As a result of this the Commissioners do not necessarily believe there needs to be specific policies in place in relation to housing developments for the elderly within the Local Plan Review; although policies which facilitate developments such as extra care or assisted living could assist in addressing the issue of an ageing population.</p>	<p>Comments noted. Whilst the mandatory building regulation M4(1) ensures some accessibility, this is considered inadequate for many older people; the optional M4(2) is generally accepted as the 'benchmark' standard. Given the ageing population and the growing unmet need for accommodation for older people, it is considered that some policy intervention is required, in addition to policies that facilitate extra care / assisted living schemes.</p>
72	<p>People want new houses that you can live in independently for longer to delay going into expensive care. perhaps you could consider homes built off site which can easily be adapted for changes in household size.</p>	<p>Comments noted. It is agreed that adaptable dwellings are an important element in providing suitable accommodation for an ageing population.</p>
73	<p>No comments.</p>	<p>-</p>
75	<p>We welcome the level of detail and consideration that has been given to these issues in the Social Policy Options paper. In order to ensure that housing options provided through the Local Plan Review provide sustainable development by taking account of specific needs. It is therefore recommended that further engagement is undertaken with colleagues in Lancashire County Council's public health and social care service areas to further explore the development of spatial policy to reflect the Health and Social Care approach to supporting an ageing population.</p>	<p>Comments noted. The Council is liaising with the LCC Public Health team in terms of the Local Plan Review in general (health and wellbeing is an important consideration in strategic planning); input from the Social Care service would be welcome.</p>
77	<p>To integrate suitable accommodation with most new developments.</p>	<p>Comments noted; it is agreed that integration of older people into the community is a good principle to follow.</p>
78	<p>Integrate with suitable accommodation with new developments - not isolated (old people villages!)</p>	<p>Comments noted</p>
81	<p>Support Option 1</p>	<p>Noted</p>
82	<p>Option 1: A general 'sustainable development' policy which directs new development to places where services and facilities are available. For example Brownfield sites and disused Town Centre buildings</p>	<p>Comments noted; accessibility to services and facilities is especially important for older people.</p>
87	<p>The older people that are known to the Parish Council (and indeed including members of the Parish Council) generally have no wish to be segregated. Older people are very large users of local services, such as the Sports Centre, as well as being regular users of health services. Burscough Parish Council has identified a need for bungalows, as older people living in 2 story, possibly larger homes, would like to downsize, to good quality properties close to services. Burscough does not have sufficient suitably located smaller single story homes. The needs of people who are ill, or have limited mobility is different from people who are simply "old". For people with limited mobility, good quality pavements, availability of public transport, close proximity to services, etc are important.</p>	<p>Comments acknowledged; it is agreed that integration is better than segregation, and that easy access to services and facilities is important, both for older people and for people with mobility issues. It is acknowledged there is a strong demand for bungalows across the Borough.</p>
95	<p>4.13 DWH acknowledges the growing need for accommodation for older people, given the increasing and rapid ageing of the population with certain areas, such as Aughton, likely to witness very significant increases in its ageing population profiles when compared to other areas of the borough. As with affordable housing, there is no one-size-fits-all approach to addressing such needs and WLBC should explore a varied approach.</p> <p>4.14 In particular, DWH objects to the establishment of a fixed target for such provision as part of market housing developments. Policy RS1 of the</p>	<p>Comments noted. It is agreed that a 'one size fits all' solution is unlikely to exist. Comments on the current 'percentage approach' are noted. The Council would strongly welcome volume housebuilders coming up with innovative housing products to meet the ageing population's accommodation needs; such products have</p>

ID	Representor Comments	Council Response
	<p>current Local Plan requires all developments providing 15 or more dwellings to incorporate 20% provision for the elderly. This approach has, however, compromised viability of developments, particularly given that it is applied in addition to the 35% affordable housing requirement. The Local Plan Review should therefore seek to avoid such a rigid one-size-fits-all approach.</p> <p>4.15 In particular, there are innovative types of housing products which cater for the needs of older people which could be implemented in the Borough. This could include:</p> <ul style="list-style-type: none"> • ‘Downsizer units’ provided by housebuilders as part of market housing schemes and made available to older people in the first instance. These provide opportunities for parents to downsize after children have left the family home, freeing up much-needed homes for younger families; and • Bespoke retirement accommodation products by a specialist provided, incorporating small-scale services and facilities. <p>4.16 Such products could form part of a sustainable development proposition at Parrs Lane (see below).</p>	<p>been sorely lacking to date, and could be one reason why the policy RS1 'percentage approach' has not worked well.</p>
96	<p>The adopted Plan does not specifically identify any sites for uses targeted at the needs of older people. It would be appropriate to identify opportunities for development for older people in locations which are attractive and benefit from services and facilities. This could mean accessible locations close to local centres, or could equally refer to bespoke developments which have more of these services and facilities provided as part of the scheme. It may be preferable at this stage to afford strong weight to proposals which do contribute towards this objective but not be overly prescriptive as to how this is undertaken.</p> <p>AIUH would confirm that the land at and to the south of St Joseph’s Seminary could represent an appropriate location for a retirement village adjoining the existing development limit to the south, and taking advantage of the open aspects to the north.</p>	<p>Comments re. St Joseph's noted. It is agreed that older people need access to services; usually this means development in sustainable locations, but it is accepted that services can be provided on-site in certain cases.</p>
97	St. Modwen make no specific comment in these respects	-
99	No comment.	-

Question 32: As you get older, what kind of accommodation do you think you might want to live in? Which policy option(s) for providing accommodation for older people would you therefore prefer?

ID	Representor Comments	Council Response
1	Small bungalows are ideal for older people they can downsize but the bungalows should not be sold.as they will be there for the next generation	Comments noted; it is not agreed, however, that bungalows should not be sold, for example in cases where 'the next generation' live elsewhere.
2	It makes sense bungalows are the best option over 55s in green space not to be sold but but as social housing	Comments noted
9	Option 7- the elderly shouldn't feel forced to leave a community they have been part of their whole life	Noted. It is agreed that, as a general principle, people should be able to stay in the community where they have been living to date, if they so desire.
14	I would want to live in my own home, the council should not get involved	The Council would not 'assign' people to accommodation provided for the elderly, but the purpose of these policies (options) is to ensure that sufficient appropriate accommodation is provided in the right places so that older people can choose where to live according to their needs / desires.
18	See response to Qu. 31.	(Noted)
20	<p>Option 2: Continue the current approach, i.e. require that a percentage of new dwellings be designed specifically to accommodate the elderly.</p> <p>Option 3: In conjunction with the above, provide a tighter definition of what constitutes 'housing designed specifically to accommodate the elderly'</p> <p>Option 4: Adopt one or both of the optional Technical Standards* for new houses</p> <p>Option 5: Require adherence to, or at least that regard be had to, the HAPPI (Housing our Ageing Population: Panel for Innovation) Design Principles**</p> <p>Every person's needs / preferences / requirements are different especially when getting older. Ideally persons should be able to choose to remain living in their own homes for as long as they can look after themselves even with some additional help going in, choose to move to sheltered accommodation or should health needs dictate, move to a care / nursing home. Persons' need for their own independence should not be ignored. Some persons may opt to move to a 'retirement village' environment will all facilities on site.</p>	Comments noted. It is agreed that a variety of approaches is likely to be the most appropriate with regard to accommodation for the ageing population, that older people have different accommodation needs / demands, and that they should have a choice as to whether to stay in their community, or move to a development designed for older people.
21	My own home possibly with more support.	Noted
23	Option 1 A case by case approach is best dependent on demand.	Comments noted
24	I would that older people would require smaller homes with smaller gardens, within easy reach of all transport, health and consumer facilities, Also the need for some sort of caring or warden accommodation may be appropriate in many cases. Together with this is the need to remain within the community they have grown old with. I should not want to live in a specific area for elderly people. Therefore, incorporate Options 4 and 5 into any plans and continue with Option 2	Comments noted; it is agreed that people should be able to stay in their community, should they so desire, and that properties (and gardens) suitable for older people are often smaller.
26	It is a mix and match	Comments noted

ID	Representor Comments	Council Response
28	Option 7	Noted
29	Retirement village development.OPTION 6	Noted
30	Have regard to option5 for option 2.	Comments noted
31	Option 7 (obviously!)	Comment noted
32	Option 7 is the preferred option surely this is what developing our Communities should be about.	Comments noted; it is agreed that such an approach should be central to planning for communities.
35	It is considered that a combination of the options put forward for the delivery of residential accommodation for older people is the most appropriate. In order to ensure that the complex needs of this demographic are effectively met, it is necessary for the Council to ensure that flexibility is provided for within the Plan to allow for a variety of accommodation types to be delivered and within the most appropriate locations. To impose the provision of specific types of older accommodation as part of future development could prevent market and affordable housing coming forward which would be to the detriment of the wider population of the Borough.	Comments noted; it is agreed that there are varying needs and therefore a variety of solutions is likely to be appropriate. Given the growing need for accommodation for older people, the market should ensure that its provision should not prevent other housing being delivered.
39	3. In conjunction with above provide a 'tighter' definition of what constitutes housing for the elderly. 6. Allocate specific sites for elderly accommodation whether age restricted bungalows, sheltered accommodation, care homes or extra care facility or retirement village. Response A : Options 3 & 6 7. Adopt a general policy approach of promoting lifetime neighbourhoods. Response B : Option 7	Comments noted
42	We have no comment at this time.	Noted
46	Options 5 & 7.	Noted
47	Option 4 sounds good.	Comments noted
48	Options 2,4,5 and 6 provide the most detailed approach to site allocation and technical standards.	Comments noted
57	See above comment	(Noted)
58	<p>The HBF is supportive of meeting the needs of older people. It must, however, be recognised that these needs are not homogeneous and will vary considerably dependent upon individual circumstances. Many older residents wish to stay within their current home whilst others will require specialist care. The Council will need to assess the likely requirements for each type of tenure before an option is identified.</p> <p>The HBF would support a permissive policy to enable the delivery of such provision. This would provide greater support to the market to deliver the demand for the relevant types of accommodation. It is noted, as identified by option 1, the market is already providing such accommodation, a permissive policy will provide greater opportunities to increase delivery.</p> <p>In conjunction to a permissive policy specific sites for older person's accommodation would also be welcomed (option 6). This would have the advantage of ensuring the accommodation is delivered in locations which most suit the needs of the residents.</p> <p>In terms of option 4, the Council correctly identifies that the optional accessibility standards can only be introduced if it passes the criteria identified within the PPG (ID 56-007). The HBF would not support a blanket introduction of the accessibility standards. Such a requirement across all sites and locations would not take account of the desirability for older and disabled persons to be situated closer to services and facilities.</p> <p>Furthermore not all buyers will require this standard and it may effectively mean purchasers pay more for something they may not need or desire. This would have consequences not only for site viability but also affordability,</p>	<p>Comments noted. In response:</p> <p>It is agreed that needs are not homogeneous (e.g. some wish to stay in their property, others are willing to move to retirement accommodation), and thus a variety of approaches / solutions is likely to be most appropriate.</p> <p>It is not agreed that the market is already delivering sufficient homes of the right type for the elderly; therefore intervention is required.</p> <p>The Council considers that imposition of M4(2) will be appropriate in certain cases, although it accepts that it may not be appropriate to apply it 'across the board' and that implications for viability / the ability to meet other requirements need to be carefully considered.</p> <p>Comments on the allocation of specific sites are acknowledged. Comments on application of 'HAPPI' principles noted; many of these reflect good design, which should be an element of any housing provided.</p>

ID	Representor Comments	Council Response
	<p>an area where the Council is already struggling to meet existing need. The HBF would not support rigid policy requirements as this is likely to impact negatively upon development viability, as noted in option 3 this will lead to missed opportunities for certain sites. We also would not support the inclusion of additional standards, such as HAPPI, as a mandatory requirement. This is considered contrary to the Governments push to minimise the use of local standards through the Housing Standards Review.</p>	
61	<p>As I get older I envisage different types of accommodation as my needs change and will be price sensitive. Shared ownership should be considered as one of the options. Initially probably a bungalow with outside space. Later this may change to assisted living, purpose built, maximum 2 storeys with possibility of communal area to reduce isolation. The next stage may be residential/ nursing care.</p> <p>Answering this question has highlighted the range of accommodation that will be required for an ageing population, quite often living in rural areas in West Lancashire, where transport links are poor. Another issue is whether this range of accommodation can be provided so that the individual can remain living in the same location. A mixture of options will be required , such as options 2,3,4,5,6,7</p>	<p>Comments noted; the examples cited clearly show the variety of accommodation needs that should be catered for; as stated, a mix of the options may well be necessary. The issue of older people living in rural areas with poor accessibility to services and public transport is acknowledged.</p>
64	<p>No comment.</p>	<p>-</p>
69	<p>a combination of 3 and 7 perhaps. Definitely should be pro-active</p>	<p>Comments noted; it is agreed there is a need to be proactive.</p>
70	<p>Please see our response to the previous question.</p>	<p>Noted; comments made above.</p>
72	<p>I think that you need to trade housing allocation for an innovative approach by developers</p>	<p>Comments noted; it is considered that housing allocations (for older people) may be appropriate in certain cases, even if an innovative approach by developers (which would be very welcome) were to happen.</p>
73	<p>No comments.</p>	<p>-</p>
75	<p>We welcome the level of detail and consideration that has been given to these issues in the Social Policy Option paper. In order to ensure that housing options provided through the Local Plan Review provide sustainable development by taking account of specific needs. It is therefore recommended that further engagement is undertaken with colleagues in Lancashire County Council's public health and social care service areas to further explore the development of spatial policy to reflect the Health and Social Care approach to supporting an ageing population.</p>	<p>Comments noted. The Council is liaising with the LCC Public Health team in terms of the Local Plan Review in general (health and wellbeing is an important consideration in strategic planning); input from the Social Care service would be welcome.</p>
77	<p>Bungalows with access to amenities and warden controlled for safety of residents.</p>	<p>Comments noted</p>
78	<p>Easy access bungalows with amenities not too far away with emergency alerts near mixed housing</p>	<p>Comments noted</p>
81	<p>Support Option 1</p>	<p>Noted</p>
82	<p>Option 2: Continue the current approach, i.e. require that a percentage of new dwellings be designed specifically to accommodate the elderly</p>	<p>Comments noted; this approach has not been entirely successful to date.</p>
84	<p>Persimmon Homes are fully appreciative of the requirements of the aging local population - however it is important to recognise the variety of needs and desires that older residents want and require. We would not support a blanket application of accessibility standards across all sites. This is considered contrary to the Governments push to minimise the use of local standards through the Housing Standards Review. This is particularly relevant when considered against the preferred Local ional Strategy as some options (increased growth in rural areas) will potentially result in development in locations unsuited to elderly accommodation.</p>	<p>Comments noted; the variety of needs / desires is recognised. It is accepted that some locations may be unsuitable for [new] elderly accommodation.</p>

ID	Representor Comments	Council Response
87	<p>None of the options presented adequately address the need for suitable accommodation for people who are planning for a less active future. Option 1 is not acceptable. Option 6, allocate specific sites, would be useful, but not on its own, and would require to be supplemented by other policies which encourage higher technical standards for new homes. Larger plots required by bungalows will undoubtedly affect the developers return, and for that reason, a percentage requirement based on footprint/not unit numbers must be built into developments.</p> <p>By continuing to build much of the same is adding to the problem not solving the problems, there is a need for more elderly housing that they want and need depending on their individual situation. It should not just be about a block of flats. I would like to see a comprehensive review of elderly people's needs undertaken as I suspect there will be a variety of options given. As nationally only 2% of new builds are only for elderly people, therefore elderly are not moving from their potentially larger homes and making these available as currently there is not more appropriate elderly housing available. By getting this right it would free up cheaper housing for young people rather than expensive new housing. I welcome some of the suggestions for the elderly however one of the big problems is poor transport and this must be considerably improved, also having services used by the elderly nearby is equally important.</p>	<p>Comments noted / acknowledged. It is likely a combination of approaches will be necessary to address the accommodation needs of an ageing population. A requirement based on footprint is an interesting / novel concept.</p> <p>It is agreed that housing provided for the elderly should be the type(s) of property they desire. Where possible, accommodation for the elderly should be located where there is good access to services and / or public transport.</p>
96	<p>Option 2 is effectively status quo planning, which is understood to have residual latent housing needs for older people in the context of demographic change where the proportion of older people will increase. This does not represent a sustainable way forward.</p> <p>Option 1 is unlikely to deliver any beneficial change to a situation understood to be unsatisfactory. To that extent, Option 1 is also inappropriate.</p> <p>Options 3 and 4 provide technical clarifications as to what constitutes an appropriately designed and specified development for older people, but is unlikely to secure any substantive improvement in the supply of residential accommodation for older people.</p> <p>In contrast, an ambition which could encapsulate the planning benefits which can be secured through promoting sites and development principles consistent with Options 5-7 do represent an appropriate and positive way forward to secure progress towards meeting the latent and future demand for residential accommodation for older people. This will include delivery of tailored accommodation within larger mixed housing schemes, and could also include opportunities for purely retirement living. Such retirement living schemes could include smaller retirement homes within urban settings, but potentially also a retirement village in a more open setting.</p> <p>AIUH would confirm that the land at and to the south of St Joseph's Seminary could represent an appropriate location for a retirement village adjoining the existing development limit to the south, and taking advantage of the open aspects to the north.</p>	<p>Comments on options 1-4 noted; comments on / support for options 5-7 noted. It is agreed that a variety of approaches is likely to be appropriate, including the embedding of certain principles when developing new market housing schemes.</p>
97	St. Modwen make no specific comment in these respects	-
99	No comment.	-
111	<p>Social Policy Issue 6 considers the delivery of residential accommodation for older people. The Paper provides further background on the pressing need and sets out seven options for the delivery of residential accommodation for older persons. Paragraph 3.12 states the following: "As the number of older people increases, the need to address their specific accommodation requirements becomes greater. These requirements may include easy access to health and social care within specific residential development, as is the case in care homes or 'retirement villages'."</p> <p>Our Client agrees with this requirement. The site promoted within this document offers an opportunity to provide a residential care village. Our client, Priory Asset Management, who are promoting this site for development has a strong track record of delivering such developments</p>	<p>The extensive comments on options 1-7 are noted, as well as the comments on the site at Black Moss Lane. Whilst a retirement village, in an appropriate location, will contribute towards meeting some of the ageing population accommodation need, there is a significant number of old / ageing people who have no desire to live in such a development (e.g. see other comments on Q31 / Q32) and these people's needs also require to be met through other means.</p>

within the Merseyside area. The land at Black Moss Lane, Aughton offers a suitable location for older person's care as it is sustainably located close to essential services and can provide the full range of accommodation and facilities referred to in the Paper.

With regards to the approach the Council should take to addressing this need, Option 1 states the following:

"Have no specific policy, but let the market deliver appropriate accommodation in line with local demand. Considering patterns of development in West Lancashire over the past decade, such an approach may result in care homes, age-specific retirement homes, and possibly extra care facilities, but is unlikely to deliver significant numbers of highly adaptable or accessibly dwellings." This option would not comprise a plan-led Option and is therefore not supported by our Client. This does not represent a positively prepared approach to plan making. This has historically been the method adopted within the Borough and has not lead to the delivery of required level of facilities. As the ageing population is increasing within West Lancashire it is recommended that the Borough take a pro-active and positive plan-led approach to the provision of older person's accommodation.

Option 2 states the following:

"Continue with the 'percentage approach' of the current Local Plan, either with a 20% requirement, or a higher or lower percentage. For larger allocations, this is likely to deliver stand-alone care home type facilities; for medium size developments, this may result in a small number of adaptable dwellings 'pepper-potted' through schemes" Option 2 places a high requirement on developers, and in combination with an additional affordable requirement may render development unviable, especially in relation to sites which have several abnormal constraints. However, a policy to deliver 20% older persons' accommodation, where possible, may be justified. Alternatively, the provision of the elderly requirement may be more appropriate in off-site locations or potentially in the form of a contribution, similar to that set out in Option 7 of Social Policy Issue 1 – affordable housing.

Option 3 is in conjunction with Option 2 and seeks to provide clarity through a tighter definition of what constitutes 'housing designed specifically to accommodate the elderly'. Our Client does not support the sole use of Options 2 and 3 as we do not believe this will deliver the quantum of accommodation for older persons housing that is required in West Lancashire. This may result in a lack of delivery of much needed housing within the Borough which could further reduce the number of people at working age.

Option 4 comprises the adoption of technical standards for new houses and states the following:"Adopt one or both of the optional Technical Standards for new houses. The justification for, and viability implications of, such an approach would need to be tested at examination. The presumed extra costs of meeting these standards may limit development in West Lancashire, or may result in other policy objectives (eg provision of affordable housing) being undermined. A variation of this option could be a requirement that a percentage of new dwellings meet one or both of the technical Standards, i.e. that compliance with M4(2) and/ or M4(3) is one of the Council's interpretations."

Option 5 is similar to Option 4 and states:"Require adherence to, or at least that regard be had to, the HAPPI (Housing our Ageing population: panel for Innovation) design Principles. These principles are based on 10 key criteria; many reflect general good design (for example good light, ventilation, room to move around), but are of particular relevance to older people's housing." Our Client agrees with West Lancashire when they state that the requirement to meet additional housing standards would impact on viability of development and the ability to deliver affordable housing.

Placing significant restrictions on housing developers could reduce the rate of development within the Borough. Our client therefore does not support the blanket use of Option 4 or Option 5. However, our client does support high quality design as an important principle. As such, they also support the

ID	Representor Comments	Council Response
	<p>use of HAPPI or similar design principles as evidence that can be presented to demonstrate elements of good quality design within a development. This allows for an evidenced based approach to quality on a site by site basis without the need for prescriptive and possibly prohibitive regulation.</p> <p>Option 6 considers an approach whereby the Council's allocates specific sites for elderly accommodation: "Allocate specific sites for elderly accommodation, whether that be age restricted bungalows, sheltered accommodation, care homes, an extra care facility, or a full blown 'retirement village'. Policy could specify the exact type of accommodation, or it could be left open." Our Client supports Option 6 and suggests that this represents the most sustainable approach to the delivery of Older Persons housing. Identifying opportunities to deliver older persons housing through the plan would ensure delivery of this type of housing and in the most effective and sustainable location. However, our client does not support an overly prescriptive approach to the type of accommodation that would be included in the allocation. This should be determined by making reference to the evidence base, as well as consideration of market demand. It is recommended that option 6 is identified as the preferred option.</p> <p>Option 7 states the following: "Adopt the more general policy approach of promoting 'Lifetime Neighbourhoods' i.e. generating a variety of housing provision and range of support relevant to a spectrum of ages and stages in a family cycle. Such an approach is difficult to enforce." As is identified by West Lancashire a policy as suggested within option 7 is difficult to enforce and therefore would not guarantee the delivery of elderly care accommodation. Our Client therefore does not support the use of option 7 on its own and would recommend that if this Option were to be used going forward other Options would also need to be used.</p> <p>Our Clients therefore propose Land at Black Moss Lane as being a suitable location for older person's housing and should be considered as an allocation under option 6. The site is close to existing services and transport facilities and free from technical constraints (as is demonstrated within this representation).The site is in the ownership of a willing land owner and is being promoted by Priory Asset Management LLP, which is a privately owned British property development company who facilitate the building of market leading developments within the Retirement, Extra Care, and Respite and Dementia Care sectors. The company has a proven track record of delivery within the north west of England and an experienced leadership team who've been involved in property development for more than 20 years. The site can therefore be deemed available in accordance with Footnote 12 of the Framework. It is therefore recommended that land at Black Moss Lane is identified for release from Green Belt able to deliver older people's accommodation</p>	

Question 33: Which key policy option with regard to the issue of control over HMOs in Ormskirk do you think is the most appropriate? Why? Are there any other policy options or minor changes that should also be considered?

ID	Representor Comments	Council Response
9	Option 1	Noted
14	option 3....all student development should concentrate on the campus, its what the Uni wants and the residents of Ormskirk.	Comments noted; it is agreed that accommodating students on the Campus is desirable. However, there remains a demand for off-campus accommodation elsewhere in Ormskirk that needs to be managed appropriately.
18	no comment	-
20	Option 1: Expand the 'Article 4 area'* and the area to which the HMO percentage policy applies, to include neighbouring settlements. - HMOs serve a useful purpose in the right location. In some cases their granting in quiet residential streets / roads is totally unacceptable as the whole characteristics of the area can be altered.....usually to its detriment. The views of residents / neighbours.....MUST be listened to.	Comments noted; it is agreed that the granting of planning permission for HMOs must not have an unacceptable impact on local residents.
23	Option 1	Noted
24	Ormskirk in particular has a very high level of student accommodation, most to its detriment. I would go for Option 3.	Comments noted
26	No comments	-
28	Option 1	Noted
30	Option 3	Noted
31	Option 4	Noted
32	Option 4 but I feel this would need to be closely monitored	Comments noted
39	1.Expand the Article 4 area to include Burscough and Skelmersdale allowing HMOs outside Ormskirk. Response A : Option 1 3.Decrease the HMO limit from current levels on all or specific streets to lower percentage even down to 0%. It is considered 5% limit is an acceptable balance of HMOs. Response B : Option 3 3.Decrease the HMO limit from current levels on all or specific streets to lower percentage even down to 0%. It is considered 5% limit is an acceptable balance of HMOs Response C : Option 3 Comment: The rationale behind restriction of HMOs, is sound, as it will discourage speculative buy-to -let purchases of properties. This buy-to-let phenomenon reduces the supply of houses for families who wish to settle and who will contribute to and invest in the area on a long term basis. It also pushes prices up and reduces affordability for families as the supply decreases.Also pre-existing residents may find that a transient population has less social cohesion, less regard for property maintenance and possibly in worst cases scant regard for neighbour comfort vis-a-vis noise,excess revelry,drunkenness etc. Expansion of HMOs may lead to existing residents moving out and eventual decline in the area.	Comments noted; comments on the rationale behind the restrictions on HMOs, and the possible effects of HMOs, are acknowledged and agreed; these matters are a primary reason for the preparation of Local Plan policy RS3 in the first place.
42	We have no comment at this time.	Noted
46	Option 1. in order to discourage the movement outwards of applications	Comments noted

ID	Representor Comments	Council Response
	for HMO's to wider areas	
48	Option 1 should ensure streets are limited to 5% HMO's and be able to absorb future demand.	Comments noted
61	The right option would depend on whether the number of HMO's in Ormskirk is at the right level, too high or too low for demand and the impact of delivering to need on existing residents. The policy decided upon should give the flexibility to adjust the number of HMO's over the period of the plan. This is particularly important if the longer term plan is adopted.	Comments acknowledged. It is agreed that there is a need for flexibility to adjust the number of HMOs over the plan period, especially if it is to be a long period. One important piece of evidence will be Edge Hill University's short / medium / long-term forecasts for student numbers. One difficulty in monitoring is to measure conversions from HMOs back to dwelling houses, as such a change does not require planning permission.
64	No comment.	-
69	Option 1	Noted
72	no comment	-
73	No comments.	-
75	We welcome the inclusion of policies which are aimed at considering the needs of the student/graduate community and for travellers (gypsies, travellers and travelling show people). Any new sites to be allocated should have regard to transport considerations and access to basic services.	Comments noted
82	Option 3: Decrease the HMO limit from current levels on all or specific streets to a lower percentage, potentially even down to 0% Improvements to Public Transport in and out of Ormskirk so that there is less incentive for Students to want to live in HMO's in what is a relatively small town. A student quarter in Skelmersdale with affordable public transport links into Edgehill should be considered.	Comments noted; improvements to public transport into and out of Ormskirk would be welcome; whether or not this would reduce students' desire to live in Ormskirk is not known. Comments on Skelmersdale accommodation noted.
87	I am aware that HMOs are already causing concerns in Burscough and I feel this is an ideal opportunity in which to manage the future situation in Burscough as it has the potential to make affordable housing harder to obtain due to landlord buying up certain properties, therefore option 3 5% limit is suggested as a viable one for should Burscough be included in 1 Article 4 Area.	Comments noted; whilst the Council is aware of a small number of HMOs in Burscough, the Council has no evidence that this has become such a pressing issue sufficient to warrant extension of the Article 4 Direction to the town, but the situation can be monitored.
96	AIUH makes no comment on this matter.	-
97	St. Modwen make no specific comment in these respects	-
99	No comment.	-

Question 34: Which policy option for off-campus, purpose-built student accommodation do you think is the most appropriate for Ormskirk / West Lancashire? Why?

ID	Representor Comments	Council Response
12	Option 2 and 3 - Make use of out of town derelict scrubland to bring in funds ie brown belt rather than green	It is agreed that, as a general principle, brownfield land should be developed first, or at least considered for development first, before greenfield / Green Belt land. Whether out of town [off campus] sites are best for student accommodation is another matter.
14	option 4..all student accommodation to be concentrated on campus	Comments noted
18	no comment	-
20	Option 1: Continue with the current policy approach of restricting off-campus purpose-built student accommodation unless strict criteria are met. - Additionally.....there must be a strong argument in favour of building more 'on campus' accommodation as there appears to be acres of land available.	Comments noted. As a general principle, the campus is considered the most suitable location for student accommodation, subject to design / landscape and other considerations.
21	Edge Hill is already too big and student accommodation over shadowing family housing. Ormskirk is already unbalanced.	Comments noted.
23	Option 1	Noted
24	Option 1 please.	Noted
26	No comments	-
28	Option 1	Noted
30	Option 2 . Multistorey , say 5/ 6 floor managed/concierge blocks	Comments noted; it is considered that 5/6 storey blocks would be unlikely to be appropriate in most (if not all) of Ormskirk.
31	Option 1	Noted
32	Option 3 seems to give the most flexibility	Comments noted
39	Option 2.Relax the current policy to allow purpose build student accommodation away from the university campus. Response A: Option 2 Option 1.Continue the current policy to restrict off campus purpose build student accommodation unless strict criteria are met. ResponseB : Option 1	Comments noted
42	We have no comment at this time.	Noted
46	I cannot see any relevant section above which deals with on-campus student accommodation? however, the requirements for on-campus should be agreed with liaison with EHU to take into account their projected future requirements. Off-Campus within Ormskirk Town Centre in low/non residential areas should be encouraged as this will have the tendency to decrease demands for HMO's in residential areas.	Comments noted. In terms of on-campus accommodation, this would be permitted in principle, subject to design, etc. considerations. It is agreed that ongoing liaison with Edge Hill University is important to understand future requirements. Comments on off-campus accommodation noted.
48	Option 3 would allow control over site, size and appropriateness of any development. However, on-campus facilities should be prioritised (but not	Comments noted; it is agreed that as a general principle, the campus is the most

ID	Representor Comments	Council Response
	extending into the Green belt) .	appropriate place for accommodation, subject to design, etc. considerations.
61	Option 1 because the options paper states there is no evidence to suggest this approach has been inappropriate. Maybe this could be combined with option 3 to give greater planning control, whilst balancing this with the ability of the university to attract students in the future.	Comments noted; whilst the imposition of the Article 4 Direction in Ormskirk has generally been considered a success, to extend it would require demonstration that student HMOs are a particular issue elsewhere. The need for balance is agreed.
62	As set out earlier in this statement Edge Hill University is growing and there are plans for expansion post 2022. It is therefore important that the appropriate housing stock is provided for students to ensure that the increase in student numbers does not have an adverse impact on existing housing stock, particularly around Ormskirk. Consideration should be therefore given to the release of land around Ormskirk/the University for a range of uses, including new education related uses.	Comments noted; the evidence base relating to student accommodation needs will be crucial in drawing up policy relating to student accommodation linked to Edge Hill University.
64	No comment.	-
69	Option 1	Noted
72	no comment	-
73	<p>It is acknowledged that, as the University has grown, the demand for student accommodation has increased exponentially. The University has responded to this demand by developing purpose-built student accommodation. Over the last few years, over 1,000 new student bed-spaces have been delivered on the Ormskirk campus. The University is now able to guarantee on-campus accommodation to all first year students. However, there is still significant demand for accommodation in Ormskirk for students in second or third year and postgraduate / mature students. The University remains committed to delivering on-campus accommodation. New forms of accommodation have been developed which will be attractive to older students. Indeed, the first 'student townhouses' are currently under construction on the site of the old running track and will be completed ahead of the September 2018 intake. The University will continue to review the demand for purpose-built student accommodation and look to respond to this.</p> <p>At this time, it is anticipated that the majority of new student accommodation will be delivered on campus; however the University may also consider delivering off-campus accommodation in Ormskirk Town Centre, subject to site availability and demand.</p> <p>The delivery of some purpose-built student accommodation in Ormskirk would help to ensure the ongoing vitality and viability of the Town Centre, its services and facilities. This is particularly relevant in the context of the relative sustainability of the settlement and the Borough's ageing population.</p>	Comments on Edge Hill University's accommodation needs and current provision, and desire for purpose built student accommodation in Ormskirk noted.
75	We welcome the inclusion of policies which are aimed at considering the needs of the student/graduate community and for travellers (gypsies, travellers and travelling show people). Any new sites to be allocated should have regard to transport considerations and access to basic services.	Comments noted
77	To consider local rate paying residents when implementing any policies regarding the above.	Comments noted; it is agreed that it is necessary and right to have regard to the impact of policies on local residents.
78	Should not impede on local rate paying residents with necessary shopping needs near	Comments noted
82	Option 3: Allocate specific sites for off-campus student accommodation, whilst restricting 'unplanned' developments elsewhere. - In Skelmersdale	Comments noted
96	AIUH makes no comment on this matter.	-

ID	Representor Comments	Council Response
97	St. Modwen make no specific comment in these respects	-
99	No comment.	-

Question 35: Which policy option(s) for addressing the issue of meeting traveller accommodation needs do you think is (are) the most appropriate for West Lancashire? Why?

ID	Representor Comments	Council Response
9	<p>I cant believe you have even suggested that CPOs could be used to force landowners to give up land to be used by travellers- thats outrageous! completely disgusting. Why should TAX PAYING people suffer like this?! Option 2 is clearly not going to work- nobody would buy a house on an estate which incorporated travellers. Which I suppose leaves option 3. Suboptimal but still.</p>	<p>Comments noted. The local authority is required to provide deliverable sites to meet the identified accommodation needs of Travellers.</p>
12	Option 1	Noted
14	<p>we do not want travellers, encourage them to go elsewhere, this might sound uncompromising and extreme, but its what is wanted</p>	<p>Many of the Travellers residing in West Lancashire have been here for several years and have local connections (e.g. via schools). We are required to meet identified accommodation needs for Travellers in this area. It is not possible for every Council to encourage Travellers to 'go elsewhere'.</p>
18	no comment	-
20	<p>Option 1: Allow the travellers based at present in West Lancashire to stay on their (currently unauthorised) sites. Evidently a workable option as apparently there are no reported issues from current arrangements.</p>	<p>Comments noted; the main issue is the location of three sites within Flood Zone 3.</p>
23	Option 1	Noted
24	<p>There does need to be accommodation for Travellers, but it needs to have some sort of control over the way they look after the sites and must include some sort of contract about leaving it in a good state. Option 1 seems to be the best way of dealing with this controversial problem but authorise the sites</p>	<p>Comments noted. It is often the case that when Travellers own a site, they tend to look after it and keep it in at least a reasonable state.</p>
26	No comments	-
28	<p>Option 3 should permit the formalisation of Option 1. - Authorised sites need to be the way forward so that the sites are controlled.</p>	<p>Comments noted.</p>
30	<p>Option 1. They have ceased to be travellers and become squatters. Travellers can move their vehicles when flooding imminent.</p>	<p>Comments noted; Travellers owning land on which they stay are not considered to be 'squatters'. Such sites are used as a base, but travelling still can take place. Touring caravans can be moved in case of flooding, but static caravans are more difficult to move.</p>
31	<p>Option 3. I don't know which unauthorised sites are currently being used but these may be contentious. Better to determine the best site location rather than tag on some provision to new developments where this may not be appropriate.</p>	<p>Comments noted</p>
32	<p>Option 1 would allow Traveller communities to remain on sites that they may feel happy and settled on.</p>	<p>Comments noted</p>
34	<p>We agree with the policy options in terms of the existing sites in flood zone 3 would be in conflict with the NPPF. We recommend combining the policy options to enable the finding of appropriate sites.</p>	<p>Comments noted. Finding appropriate sites has been very difficult, primarily on account of land availability.</p>

ID	Representor Comments	Council Response
39	<p>Option 1. Allow travellers based at present in West Lancashire to stay in their currently unauthorised sites, including flood zone 3 sites.</p> <p>Response A:Option 1</p> <p>Option 2 When allocating new sites for other developments in the Borough set aside part of their sites for travellers.</p> <p>Response B:Option 2</p>	Comments noted, including comment regarding Flood Zone 3.
42	We have no comment at this time.	Noted
46	Consider Council purchase of land in appropriate location via negotiation first before moving onto Option 3. Compulsory Purchase.	Comments noted
48	<p>Retain the 3 unofficial sites as unofficial sites and follow Option 2. Retain Option 3 as a last resort. The unofficial sites have proved to work thus far and whilst not condoning unofficial sites by leaving them unofficial, their status is not being condoned. Option 2 would provide additional allocation in line with planning guidelines and Option 3 held in reserve for emergency use if all else fails.</p>	Comments noted; this is considered an innovative approach; it is, however, dependent upon Option 2 being selected.
64	No comment.	-
72	Option 3	Noted
73	No comments.	-
75	<p>We welcome the inclusion of policies which are aimed at considering the needs of the student/graduate community and for travellers (gypsies, travellers and travelling show people). Any new sites to be allocated should have regard to transport considerations and access to basic services.</p>	Comments noted. It is not always possible to have Traveller sites that have access to basic services, as sites are often in rural areas.
77	Only in an area where not encroaching on local residents.	Comments noted
78	Open area not affecting local life monitored regularly	Comments noted
82	Option 2: When allocating new sites for other development in the Borough, set aside part of those sites for travellers	Noted
87	Burscough Parish Council supports option 1, allowing travellers to stay where they are at present.	Comment noted
96	AIUH makes no comment on this matter.	-
97	St. Modwen make no specific comment in these respects	-
99	No comment.	-

Question 36: Are there any other social policy issues that should also be considered? If so, what are they?

ID	Representor Comments	Council Response
10	<p>Avoid the cram them in philosophy and recognise that space is vital and has a great effect on the quality of living.</p> <p>Better and more varied job opportunities would help strengthen the housing market.</p>	<p>Comments noted. It is agreed that access to quality open space is very important in terms of health and wellbeing / quality of life.</p> <p>It is also agreed that better and more varied job opportunities would help strengthen the housing market.</p>
14	<p>big chains and brands should be encouraged, shops, hostelrys and leasure groups, they bring good jobs and depth to their locations</p>	<p>Comments noted; these things should be beneficial if they could be deliverd.</p>
18	<p>no comment</p>	<p>-</p>
20	<p>None at this time.</p>	<p>-</p>
30	<p>Provision of land for town centre school/s in Skelmersdale so that the need for young people to travel out of the area for "A" level studies and to replace the loss of Glenburn at a time when it is the hope of WLBC to increase the population.</p>	<p>Comments noted; it is agreed that being able to offer A-level courses would be a benefit to Skelmersdale.</p>
31	<p>Not that I can think of</p>	<p>Noted</p>
32	<p>I am not aware of any</p>	<p>Noted</p>
39	<p>No comment</p>	<p>-</p>
42	<p>We have no comment at this time.</p>	<p>Noted</p>
44	<ul style="list-style-type: none"> • Housing developments that encourage a good 'work-life balance' and sustainable communities should be supported. • A variety of housing is needed with small starter homes and larger homes (to encourage working from home) with community facilities and small offices close by. • Small offices (designed to look similar to residential homes) mixed with houses that blend in with the housing (not a giant office block or industrial units) are helpful for supporting small businesses and a thriving local economy. This type of development enables people to walk to work. • It is vital to have community facilities within close walking distance of homes. • A garden village development would benefit West Lancashire. • Opportunities for self-build developments are essential. • I support a strict greenbelt policy, except there should be a minimal nibbling away to allow villages to become more sustainable, while preserving green space between settlements. • Housing density needs to allow space for planting small trees and joined up pavements where people can easily walk from A to B. 	<p>Comments noted and generally agreed - the suggestions made / principles outlined tie in with the planners' overarching goal of 'sustainable development' / 'sustainable communities'. Some elements are easier to deliver than others, and we are not starting from a 'blank canvas' - development is in place already.</p>
46	<p>Policy should be developed which encourages an increase in Working Age Population and also encourages an increase in higher skilled occupations, especially within Skelmersdale.</p>	<p>Comments noted and agreed; delivering an increase in working place population and higher skilled employment opportunities can be encouraged through suitable policy.</p>
50	<p>HIGHWAYS ENGLAND COMMENTS: SOCIAL POLICY OPTIONS PAPER</p> <p>The Social Policy topic paper presents a number of options for potential socially orientated policies for the Borough. This paper does not present any further discussion on housing numbers or the spatial distribution of</p>	<p>Extensive comments noted; these are not all directly relevant to the Social Policy options paper.</p> <p>A traffic assessment will be undertaken as</p>

ID	Representor Comments	Council Response
	<p>potential site allocations, but rather addresses topics such as affordable housing, student accommodation, and housing for older generations. While the type of dwelling provided will have an impact on the propensity to travel by private car, and Highways England would welcome clarity over proposed locations for specific types, the individual topics covered in this paper are unlikely to have significant implications for the safety and operation of the SRN.</p> <p>Local Plan Evidence Base Review</p> <p>The Local Plan Review documents include details on the work being undertaken to update the evidence base underpinning the Local Plan. This evidence base includes two documents of specific interest to Highways England: the Infrastructure Delivery Plan (IDP) update, and a Transport Thematic Spatial Evidence Paper (TSEP).</p> <p>These documents are reviewed below:</p> <p>Infrastructure Delivery Plan Update 2016/17 (Part 1)</p> <p>The IDP provides the background evidence for the infrastructure requirements to support the Local Plan, including the transport requirements. The review of the IDP is deemed necessary in order to support the review of the Local Plan and ensure the requirements are still relevant and up-to-date.</p> <p>Part 1 of the IDP review provides baseline data regarding infrastructure provision in the Borough, including updates on the plans and strategies of partners and the progress regarding the delivery of infrastructure. We anticipate that, following this 'Issues & Options' consultation, the next stage of the Local Plan review will work towards the identification of potential infrastructure to support the growth aspirations of the new Local Plan.</p> <p>Chapter 9 of the IDP review (Part 1) addresses transport provision in the Borough, although the review doesn't explicitly discuss the SRN or any current associated issues. It is our understanding that the M58 mainline is generally under-capacity, although there are localised issues at a number of junctions, including the terminus junctions (although these are outside of the Borough boundaries). There is also potential for impact at Junction 27 of the M6 (which is also outside of the Borough boundary).</p> <p>Transport Thematic Spatial Evidence Paper (TSEP)</p> <p>The TSEPs are intended to summarise the baseline evidence for each topic in West Lancashire, - and are used to identify issues within the Borough. The Transport TSEP sets out a brief context review, summarising relevant national and local policy, and then presents a description of the existing transport provision in the Borough, including statistical data on topics such as car ownership and travel patterns. The baseline data identifies the Borough's good level of connectivity to neighbouring towns, such as Southport, Preston, St Helens, Wigan, and Liverpool, in addition to good connections to the wider SRN via the M6 and M58.</p> <p>The data presented identifies that approximately 60% of those employed residents in West Lancashire travel outside the Borough to their place of work, with the most popular destinations being: Sefton (25% of employed West Lancashire residents), Liverpool (14%), Wigan (11%), Preston (6%) and St Helens (5%). While approximately 22,000 individuals travel outside the Borough for employment purposes, approximately 20,000 travel into the Borough from various neighbouring authorities, with the most likely origins being: Sefton (26%), Wigan (24%), St Helens (9%) and the rest of Lancashire (12%).</p> <p>The TSEP identifies that the West Lancashire Highways and Transport Masterplan, along with the West Lancashire Infrastructure Delivery Schedule and the Liverpool City Region Rail Strategy, introduces a number of site specific matters that the Local Plan Review must address in terms of delivery or safeguarding; point number 7 is of particular relevance to the SRN, stating: - "How West Lancashire relates to the wider transport network and the opportunities that creates e.g. the locational advantage of</p>	<p>Preferred Options are drawn up, to assess the implications of proposed development sites. Highways England's input is crucial, especially in terms of wider strategic impacts of the new West Lancashire Local Plan and neighbouring authorities' proposed developments.</p>

Skelmersdale relative to motorways etc.”

Key Points:

☒ The draft IDP review released as part of the consultation documents is considered to be stage 1 of the IDP process, presenting a baseline of existing transport (and other infrastructure) provision within the Borough. At this stage, there is no identification of future requirements. Given the Local Plan process is still at the Issues & Options consultation stage, with little certainty presented over the scale or location of development, this is to be expected.

☒ The TSEP presents further baseline data, analysing travel patterns and trends both within the Borough and across boundaries; it is clear that there is significant daily movement between the neighbouring authorities, with many of these journeys likely to use the SRN. The TSEP also identifies the requirement for the Local Plan to consider its cross-boundary implications in regards to infrastructure, which includes the implications for the safety and operation of the SRN.

☒ Highways England looks to work proactively with West Lancashire Borough Council in using the baseline data to evaluate the preferred and more likely options presented in the Strategic Development Options Paper.

Links with the Liverpool City Region (LCR)

It is accepted that at this early stage in the Plan process, there is a great deal of uncertainty over the locations, amount, and type of development, and even over the extent of the Plan period. However, one of the most important points from the emerging documents for Highways England is the Borough’s aspiration to potentially accommodate an unmet need for housing and employment from the Liverpool City Region (LCR). While not part of the LCR combined authority, West Lancashire is an associate member of the LCR Combined Authority, and considered part of the LCR in regards to spatial planning matters. The Plan documents state that this unmet need is expected to be in the form of large-scale logistics, emphasising the need to capitalise on the LCR’s growth strategies focussed on logistics and freight. The Strategic Polices Options Paper states that: “There is a significant opportunity to boost the local economy, especially in the M58 corridor, as a result of the Liverpool2 deep water terminal and expected surge in demand for logistics facilities and ‘spin-off’ industries. Skelmersdale is likely to be the most appropriate location for such opportunities given its excellent road access from the Port of Liverpool.” Skelmersdale is well-located for access to the M58 and the wider SRN, with the M58 passing within the town’s southern boundary. As already discussed, the M58 itself is considered to have available capacity, but the terminus junctions suffer from localised issues, which are considered of particular concern at ‘Switch Island’, the confluence of the M58, M57 and a number of ‘A’ roads, including the A5036 Dunnings Bridge Road. This junction lies within the neighbouring Borough of Sefton, just to the north-east of Liverpool, and the A5036 Dunnings Bridge Road is identified in the Merseyside LTP3 Freight Strategy as the key access road to the Port of Liverpool, carrying approximately 70% of the port’s external road traffic. Any increase in traffic along this route is therefore likely to impact on Switch Island, and potentially have safety and operational implications for both the M58 and M57 terminuses.

The Plan documents do not provide certainty as to whether this unmet need will materialise, and it is anticipated that this will become clear through the Plan process, and through the progression of neighbouring authorities’ Local Plans. Nevertheless, it will be important for Highways England to be kept informed of the strategic aspirations for not only the LCR but also the closely associated aspirations of neighbouring authorities. In this regard, we have reviewed the status neighbouring authorities’ Local Plans.

- Halton Local Plan Core Strategy (April 2013) - Halton Borough Council’s Core Strategy Local Plan was adopted in April 2013, and contains the spatial vision for the Borough through to 2028, as well as a range of strategic objectives and policies. Halton Borough Council is currently progressing a

Delivery and Allocations Local Plan document that will replace the remaining policies and the Proposal Map from the saved Unitary Development Plan (2005). A scoping consultation was undertaken in February 2014, with the preparation of a draft Local Plan commencing following that exercise. There is no expected timeframe published on Halton Borough Council's website.

- Knowsley Local Plan Core Strategy (January 2016) - The Knowsley Core Strategy (CS) was adopted in January 2016. The CS includes site allocations for areas to be released from the greenbelt, referred to as 'Sustainable Urban Extensions', while the Local Plan: Site Allocations and Development Policies document is anticipated to identify further proposed site allocations for housing and employment land. The Knowsley Local Plan: Schedule lists this document as 'TBC', with no updates on a timeframe for consultation on a draft document.
- Liverpool Local Plan - The emerging draft Liverpool Local Plan was consulted on from September to November 2016. The draft document is not considered a publication version in its current state, and does not include employment land allocations at this stage. The draft Local Plan draws heavily on content prepared for the Liverpool Council Core Strategy, which progressed to the pre-submission stage in 2012. Planning applications in Liverpool are currently assessed against the saved policies of the UDP, adopted in November 2002.
- Sefton Local Plan (April 2017) - The Sefton Local Plan has now been examined by the Inspector, and is anticipated to be adopted on 20th April 2017 (at the time of writing). The Local Plan sets out: How development will be provided for to meet the needs of Sefton's communities; the policy framework for making decisions on planning applications; the strategic policy framework for Neighbourhood Plans; and priorities for investment in employment, housing and infrastructure, including site allocations. The site allocations include four strategic employment locations, with two in close proximity to the SRN:
 - ☐ Land to the East of Maghull: 1,400 dwellings and 20ha of employment land located adjacent to junction 1 of the M58; and
 - ☐ Dunnings Bridge Road corridor: 3 individual plots totalling approximately 26ha of employment land fronting onto the A5306 Dunnings Bridge Road.
- St Helens Local Plan - St Helens Council is currently preparing a new Local Plan, and consulted on a 'preferred options' draft from December 2016 to January 2017. This review found that the St Helens Local Plan placed considerable emphasis on logistics and freight uses, and lacked transport evidence to support the proposed site allocations.
- Wirral Core Strategy - Planning applications in Wirral are currently assessed against the saved policies of the UDP, adopted in February 2000, although it is anticipated that a number of these saved policies will be replaced by the Council's emerging Core Strategy Local Plan, with a revised proposed submission draft expected to be reported in September 2017. Wirral Council is expected to produce a Land Allocations and Heritage Local Plan post-adoption of the emerging Core Strategy, although there is no timetable available for the publication of this document.
- Key Points:
 - ☐ The review of the Issues & Options consultation documents identifies that West Lancashire may potentially look to accommodate the unmet need for large-scale logistics from the LCR, which has potentially significant implications for the safety and operation of the SRN.
 - ☐ The actual requirement to accommodate for this need is not yet fully determined, and is anticipated to become clearer over the Plan process.
 - ☐ The amount of unmet need to be accommodated will depend on the allocations of the neighbouring authorities, and their ability to accommodate for their own identified growth needs.
 - ☐ Only Sefton Council has a recently adopted Local Plan; St Helens and Liverpool Councils have an emerging Plan, while Wirral, Knowsley, and Halton Council only have or are in the process of producing a Core Strategy, with no Site Allocation document currently available.
 - ☐ Highways England will look to ensure that the emerging West Lancashire

ID	Representor Comments	Council Response
	Local Plan and transport evidence takes into account the aspirations of the neighbouring authorities and considers the cross-boundary impacts of their emerging Local Plans.	
52	<p>What do we need to consider? Agree with suggestions – plus a need to build a sense of community – identity, involvement. The Council and local groups – clubs, sports clubs, scouts, businesses – should get to know one another. A liaison officer? - to identify links, to see how each could help the other. E.g. St John's Ambulance provide cover at events, but others could do other things – e.g. scouts, local businesses etc. Sports clubs could help with your question about encouraging physical activity – and Edgehill in various ways.</p>	Comments and suggestions noted. The ideas have merit, but may be beyond the scope of this planning document.
53	<p>Housing density needs to allow space for planting trees and joined up pavements where people can easily walk from A to B. It is vital to have community facilities within close walking distance of homes. Housing developments that encourage a good work-life balance and sustainable communities should be supported. Opportunities for self-build developments are essential. A garden village development would benefit Skelmersdale and West-Lancashire.</p>	Comments noted and generally agreed - the suggestions made / principles outlined tie in with the planners' overarching goal of 'sustainable development' / 'sustainable communities'. Some elements are easier to deliver than others, and we are not starting from a 'blank canvas' - development is in place already.
61	Through recent personal experience I have become aware of the lack of provision for people below the age of 65 with disabilities. This is particularly so for good quality residential care. Planning policy should aim to address this gap in the market.	Comments noted; whilst policy looks at the ageing population, the needs of those with health issues (not necessarily older people) also should be considered. Health and wellbeing is an important consideration that should underpin the Local Plan.
63	<p>EDUCATION:</p> <ul style="list-style-type: none"> - Lathom High School and Our Lady Queen of Peace schools need to be rebuilt away from the periphery to more central locations. The new schools would be purpose built and provide pupils with the means to walk to school and not be in danger going home during dark winter nights. - Closing Skelmersdale Sports Centre during the year of the Olympics was a massive blow to many people in the town. Play is the most important activity for children to engage with. The benefits are long lasting and crucial in the development of well-rounded individuals. The Plan has to include the creation of an indoor Sports Centre that can be used by families and school pupils. West Lancashire college indoor sports hall is underused and is an ideal venue. Schools and West Lancashire College should be encouraged to use football pitches at Glenburn and the sport's hall at West Lancashire College. - Workshops in the community to show young people how to learn basic plumbing, electrical work, plastering, basic literacy and numeracy. This could be a precursor towards a full time course at West Lancashire college. - Go to any town in the UK and you'll find parks. The Plan also has to include a large park with grass for football, play equipment and a café with tables for supervisory adults. - The Plan must also have a policy that is additional to the National Curriculum. It should have policies based on teaching people how to protect their environment, how not to get into debt and how to buy and eat healthily. It should also teach the benefits of exercise. This could be achieved with links to Aldi, Asda and other food outlets. 	<p>Comments noted. Whilst a number of good ideas and useful suggestions have been put forward, many of these are beyond the scope / powers of the Local Plan.</p> <ul style="list-style-type: none"> - Education: moving the schools may have benefits, but this depends on the policy and resources of Lancashire County Council Education, and would be a major undertaking. - Sports Centre: it is agreed that closure of the Sports Centre is disappointing; there are plans to build another in a more central location. The need for exercise / active lifestyles is crucial to a healthy population. Planning can contribute towards this. - Workshops: this is a good idea, but beyond the scope of the Local Plan - Park provision - once again, this is a good idea; land availability is an issue. The Tawd Valley is to be made into a large informal park. - National Curriculum: once again, this is a good idea, and the teaching referred to is very important, but it is beyond the scope of the Local Plan.
64	<p>Housing Density – Consideration should be given to proposed densities of housing development. Densities should be applied on a site-by-site basis to reflect the character of the site and area, rather than being stipulated through policy. This approach is supported by Paragraph 47 of the NPPF which states that local authorities should set their own approach to housing</p>	<p>Comments noted. With regard to density, it is envisaged there will be a general 'standard' but likely scope for variation on a site-by-site basis according to the characteristics of each site. Housing mix can be stipulated in policy,</p>

ID	Representor Comments	Council Response
	<p>density to reflect local circumstances.</p> <p>Housing Mix -</p> <p>The emerging Plan should provide a wider range of affordable and market housing to meet local housing need. Whilst this is identified within the Objectives, it has not been referred to within the social housing issue paper. The overall housing mix should be derived from the SHMA, but each site and mix should be considered on its own merits.</p>	<p>drawing on the Council's evidence base.</p>
66	<p>National Planning Policy Framework</p> <p>The National Planning Policy Framework (the Framework) makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development and that Local Plans should meet full objectively assessed needs (OAN) for housing.</p> <p>The Framework sets out the Government’s commitment to ‘significantly boosting the supply of housing’ and how this should be reflected through the preparation of Local Plans, it is imperative that the emerging WLLP is formulated on the basis of meeting this requirement. In this regard, §47 of the Framework sets out specific guidance that local planning authorities should take into account when identifying and meeting their objectively assessed housing needs and states:</p> <p>‘To boost significantly the supply of housing, local planning authorities should:</p> <ul style="list-style-type: none"> - Use their evidence base to ensure that their Local Plan meets the full, objectively-assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; - Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements... - Identify a supply of specific, developable sites or broad locations for growth, for - years 6-10, and where possible for years 11-15.’ <p>The starting point of identifying objectively assessed housing needs is set out in §159 of the Framework, which requires local planning authorities to prepare a Strategic Housing Market Assessment, working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects for the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (§158).</p> <p>Once a local planning authority has identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (§14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three.</p> <p>Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (§152).</p> <p>To be considered sound at Examination the emerging WLLP will need to meet all four of the soundness tests set out in §182 of the Framework. Paragraph 182 states: “A local planning authority should submit a Plan for Examination which they consider is ‘sound’ – namely that it is:</p> <ul style="list-style-type: none"> • Positively prepared – the plan should be prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; • Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; 	<p>Extensive comments noted. A significant proportion of these comments is copied from NPPF / PPG. The Council is well aware of national policy / guidance on plan-making; the Council is also aware of the Solihull Judgment.</p> <p>Whilst the HEDNA does not consider affordable housing needs, an Affordable and Specialist Housing Needs Study has been undertaken; its results will be taken into consideration as policies are prepared.</p>

ID	Representor Comments	Council Response
	<ul style="list-style-type: none"> • Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and • Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with policies in the Framework.” <p>Planning Practice Guidance - As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing Local Plans. Further updates to the PPG have been made in the intervening period. The PPG on Housing and Economic Development Needs in particular provides a clear indication of how the Government expects local planning authorities to take account the requirements of the Framework when identifying their objectively assessed housing needs. In summary the Housing and Economic Development Needs chapter of the PPG states:</p> <p>Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, infrastructure or environmental constraints.</p> <p>Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.</p> <p>Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained - by supply.</p> <p>Where the supply of working age population that is economically active is less than the projected job growth, this could result in unsustainable commuting patterns and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how much the location of new housing or infrastructure development could help address these problems.</p> <p>If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan.</p> <p>Plan makers should take account of concealed households.</p> <p>Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Appropriate comparisons of indicators (land prices, house prices etc.) should be made with longer term trends in the HMA, similar demographic and economic areas, and nationally. Divergence under any of these circumstances will require upward adjustment to planned housing numbers.</p> <p>The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.</p> <p>Market signals are affected by a number of economic factors. Plan makers should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability.</p> <p>Objectively Assessed Housing Need - The process of undertaking an OAN is clearly set out in the Framework principally in §14, §47, §152 - and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.</p> <p>The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working</p>	

with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying:

“The scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- Meets household and population projections taking account of migration and demographic change;
- Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- Caters for housing demand and the scale of housing supply necessary to meet this demand.”

Key points that are worth noting from the above is that the objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a 3% housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.

The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. The implications of OAN following the High Court Judgment in Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:

“The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies... The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “Here, numbers matter; because the larger the need, the more pressure will or might be applied to infringe on other inconsistent policies”. Therefore following the exercise to identify the full OAN for housing in an area, “Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)

This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated

ID	Representor Comments	Council Response
	<p>and where this is not possible, where compensatory measures may be appropriate.</p> <p>The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above, “Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> • any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or • specific policies in this Framework indicate development should be restricted.” <p>It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include: “sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”. Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.</p> <p>The PPG contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.</p> <p>West Lancashire Strategic Housing Market Assessment Gladman have considered the Housing and Economic Development Needs Assessment (HEDNA) prepared by GL Hearn in March 2017 to support the WLLP Review. Gladman are concerned that the report has not specifically assessed the need for affordable housing.</p> <p>This is an important issue which needs to be considered in drawing conclusions on the overall assessment of housing need. The report refers to the 2009 SHMA which identifies an affordable housing need of 540dpa. This is a significant figure which the Council should seek to meet. However, this evidence is now 8 years old and it is likely that affordable housing need in the borough has changed during this period. It is therefore important, that the Council update this piece of evidence in order to ensure that the WLLP seeks to meet full OAN.</p>	
68	<ul style="list-style-type: none"> • Housing developments that encourage a good 'work-life balance' and sustainable communities should be supported. • A variety of housing is needed with small starter homes and larger homes (to encourage working from home) with community facilities and small offices close by. • Small offices (designed to look similar to residential homes) mixed with houses that blend in with the housing (not a giant office block or industrial units) are helpful for supporting small businesses and a thriving local economy. This type of development enables people to walk to work. • It is vital to have community facilities within close walking distance of homes. • A garden village development would benefit West Lancashire. • Opportunities for self-build developments are essential. • I support a strict greenbelt policy, except there should be a minimal nibbling away to allow villages to become more sustainable, while preserving green space between settlements. • Housing density needs to allow space for planting small trees and joined up pavements where people can easily walk from A to B. - - 	<p>Comments noted and generally agreed - the suggestions made / principles outlined tie in with the planners' overarching goal of 'sustainable development' / 'sustainable communities'. Some elements are easier to deliver than others, and we are not starting from a 'blank canvas' - development is in place already.</p>
72	no	-

ID	Representor Comments	Council Response
75	<p>A number of issues have been stated in this section but no policy options have been provided to help address them. We would welcome further consideration to be given to planning policy options to help facilitate healthy lifestyles (including healthy eating, physical activity) and the provision of services and facilities for young people and children. We recognise that some of these issues may have been addressed elsewhere in the Issues & Options papers but thought should be given to where options should target the specific needs with regard to young people and children. For example, a policy regarding hot food takeaways could be extended to include school exclusion areas.</p>	<p>The need for facilitation of healthy lifestyles is recognised; where possible, planning policies can seek to influence / facilitate objectives such as healthy / active lifestyles. Health and wellbeing is / should be an intrinsic consideration in preparing the Local Plan Review.</p>
77	<p>Try to keep West Lancs as green and environmentally friendly as possible.</p>	<p>Comment noted; this is a laudable aim, but under national policy must be balanced against other considerations.</p>
78	<p>Keep West Lancs green open friendly and environmentally a leader</p>	<p>Comment noted; this is a laudable aim, but under national policy must be balanced against other considerations.</p>
87	<p>Overall the paper puts many good points and alternative views, however it demonstrates why the developers and landlords arguments dominate in their favour on decisions in the Planning process.</p> <p>In my experience Developers have too much power and take advantage of the Planning process with extremely little notice taken of the local residents views. In areas of disagreement then more notice needs to be given to residents and by creating the right policies this can be achieved. In Burscough we have seen developers wanting to build what they want to build due to cost and profit and not what the residents need, this must change. The developers appear to dominate the planning process and therefore there is a need to ensure this is more balanced and with the right policies and subsequently working with the right developers the locality will obtain a more balanced outcome. In doing things in a different way the Council should investigate buying land for developments and having its own building operations or working in partnership with others, this could prevent the market place being skewed.</p> <p>In many instances these developments are adding to the problems within the locality and currently are unlikely to improve the locality and again with the right policies this can be done. We need to move more towards the right policies and not have weak potential promises that don't get delivered; any promises made must be backed up with a delivery timescale. By continuing to build much of the same is adding to the problem not solving the problems, there is a need for more elderly housing that they want and need depending on their individual situation. It should not just be about a block of flats. I would like to see a comprehensive review of elderly people's needs undertaken as I suspect there will be a variety of options given. As nationally only 2% of new builds are only for elderly people, therefore elderly are not moving from their potentially larger homes and making these available as currently there is not more appropriate elderly housing available. By getting this right it would free up cheaper housing for young people rather than expensive new housing. I welcome some of the suggestions for the elderly however one of the big problems is poor transport and this must be considerably improved, also having services used by the elderly nearby is equally important.</p> <p>There must also be suitable housing for young couples and single people and appropriate housing for people with disabilities and learning difficulties who can live in the community, while it is mention it needs to cover a wide range of potential residents needs and situations, however it is essential that this is documented and included in any proposals.</p> <p>In the last few years the housing market has changed quite considerably as young people are earning less, temporary/short term employment, having difficulty in gaining mortgage and with graduates having large amounts of debt the last thing many young people are thinking about is buying an expensive house. Young people also see themselves in temporary situations in a number of different aspects of their lives yet may wish to live</p>	<p>Comments noted. Comments relating to affordable housing / housing for young people, accommodation for older people, HMOs in Burscough, and the possibility of a canal marina at Burscough are addressed above.</p> <p>In terms of developer influence in the planning system, comments are noted; it is understood why this feeling prevails amongst many residents. The need for an appropriate balance is recognised.</p>

ID	Representor Comments	Council Response
	<p>independently and therefore the market place needs to take account of this change. The number of houses for affordable housing or social housing must be of a higher volume than what currently is achieved to meet this changing need.</p> <p>Burscough is a key shopping destination for those who use the canals, as it's either the first or last stopping point for shopping on the way to and from Liverpool, I therefore believe there is a need for a Marina for canal boats.</p> <p>In having the right policies it is also possible to regenerate the area through increasing the footfall. We should also ensure the show people who have long been established in the area have proper quality accommodation in the right location.</p> <p>I am aware that HMOs are already causing concerns in Burscough and I feel this is an ideal opportunity in which to manage the future situation in Burscough as it has the potential to make affordable housing harder to obtain due to landlord buying up certain properties, therefore option 3 5% limit is suggested as a viable one for should Burscough be included in 1 Article 4 Area.</p>	
90	<ul style="list-style-type: none"> • Housing developments that encourage a good 'work-life balance' and sustainable communities should be supported. • A garden village development would benefit West Lancashire. • A variety of housing is needed with small starter homes and larger homes (to encourage working from home) with community facilities and small offices close by. • Small offices (designed to look similar to residential homes) mixed with houses that blend in with the housing (not a giant office block or industrial units) are helpful for supporting small businesses and a thriving local economy. This type of development enables people to walk to work. • It is vital to have community facilities (such as playing fields) within close walking distance of homes. • Opportunities for self-build developments are essential. • I support a strict greenbelt policy, except there should be a minimal nibbling away to allow villages to become more sustainable, while preserving green space between settlements. • Housing density needs to allow space for planting small trees and joined up pavements where people can easily walk from A to B. 	<p>Comments noted and generally agreed - the suggestions made / principles outlined tie in with the planners' overarching goal of 'sustainable development' / 'sustainable communities'. Some elements are easier to deliver than others, and we are not starting from a 'blank canvas' - development is in place already.</p>
96	<p>AIUH make no specific comment in these respects.</p>	-
97	<p>St. Modwen make no specific comment in these respects</p>	-
99	<p>Housing Density – Consideration should be given to proposed densities of housing development. Densities should be applied on a site-by-site basis to reflect the character of the site and area, rather than being stipulated through policy. This approach is supported by Paragraph 47 of the NPPF which states that local authorities should set their own approach to housing density to reflect local circumstances.</p> <p>Housing Mix- The emerging Plan should provide a wider range of affordable and market housing to meet local housing need. Whilst this is identified within the Objectives, it has not been referred to within the social housing issue paper. The overall housing mix should be derived from the SHMA, but each site and mix should be considered on its own merits.</p>	<p>Comments noted.</p> <p>With regard to density, it is envisaged there will be a general 'standard' but likely scope for variation on a site-by-site basis according to the characteristics of each site.</p> <p>Housing mix can be stipulated in policy, drawing on the Council's evidence base.</p>
111	<p>This section of our report considered the Social Policy Options Paper which considers the planning issues that might affect the different groups of people that live, work and spend time in West Lancashire.</p> <p>Paragraph 2.1 and 2.2 of the Social Options Paper details the rate of increase in aged population within the Borough, as follows: “The population in West Lancashire is expected to increase from 111,900 in 2014 to 116,200 by 2037 representing an increase of 3.8% or additional 4,300 residents on 2014 levels. This will include a significant increase in the aged population but both a proportionate and numerical decrease in the working age population. Economic dependency upon the working age</p>	<p>Comments on ageing population noted.</p>

ID	Representor Comments	Council Response
	<p>population will therefore increase...</p> <p>...West Lancashire currently has economic activity rates below both the regional and national averages.”</p> <p>West Lancashire identifies within paragraph 1.2 of the Paper that the ageing population is a key issue for the Borough. Our Client agrees and supports the Borough in finding the sustainable locations to deliver housing for older persons.</p>	

Question 37: Do you have any general comments to make on the Issues and Options consultation?

ID	Representor Comments	Council Response
2	<p>Yes we think you should adopt the Shropshire councils approach - allow local people to build on greenbelt were possible they have allowed - 350 to build up to now the council specific requirements are the property's can only be sold at 60 percent of the value to avoid people cashing in - this means only local people do this..as west Lancashire is 98 percent - green belt we feel greenbelt has to be built on or move the boundaries to - release land - -</p>	
3	<p>I am unable to attend the meeting in Tarleton, but along with a lot of the residents in Tarleton we are extremely concerned why the over development of this once village is being allowed. The schools are at bursting point, with one doctors full and one closing, you cannot register with the local dentist. The roads are getting grid-locked and dangerous . The houses prices are out of reach of most people who live in the village and the loss of community is starting to affect the village (small town).</p>	
4	<p>I was brought up in Aughton and have lived in Skelmersdale, Ormskirk and now in Burscough, so have seen changes in these areas. I cannot believe how congested Ormskirk and Burscough have become. Burscough is particulaly bad as the A59 is so narrow through the village. It is quite alarming to walk through as pavements in parts are narrow. - I appreciate that councils are having to make decisions to build new houses but I cant understand why Skelmersdale is not being looked at. It has so much space and 'brown land' to build on. The roads are better in Skem, you never get congestion. I thought we needed houses for first time buyers? Then why are ALL the new houses that have been and are being built, all around the £300,00- £400,000 price? - Skem has so much to offer, especially if the train station goes ahead. It was built as a new town, so has the infrastructure. You could really improve the town. - I fear Ormskirk is going down hill. I think there are too many students living in the town. I think I can comment as I've lived here all my life, I am 48 and have seen huge changes. - Burscough will be the same if planning to keep building goes ahead. Ormskirk and Burscough cannot cope with any more traffic or houses. Please consider this. Dont ruin whats left..please! Make Skem a better place to live for the people there. This is not a case of 'not in my back yard' I really think Skem deserves some attention now ...it has so much to offer. -</p>	
5	<p>As requested I wish to confirm the following issues. - 1-We are most concerned with matters relating to the Crossens Pumping station. - The flooding issue is No1 and we prefer to see an increase to rates if thats what is required. Flooding would destroy local market gardening businesses. - The River Ribble is no longer dredged and the areas defences are under threat. - The pumps must not be turned off. - - 2- We would like our road to be adopted by the council. -</p>	
6	<p>Thank you for the opportunity to participate in the preparation of the new local plan. - - I believe planning is an essential ingredient to modern life . I am not convinced that the process should take four years to prepare . Modern life is evolving ever more quickly and it is vital that we use our technology to enable planning to be ongoing so that we do not become constrained by a plan which is out of date. - - World events show the need for more effective communication between all forms of government. Constituents are showing a growing restlessness with politicians who lack initiative and are unable to deal with any problem without asking for</p>	

ID	Representor Comments	Council Response
	<p>increased revenue . - - What constituents would prefer is greater opportunity to participate. Use local knowledge if necessary on an everyday basis . - - Why cannot best practice be exercised ? Why cannot a more holistic approach be utilised to the issues of the day ? - - As wages diminish and central government pass increasing responsibilities to local government you need to provide a much more robust and financially effective approach . - - Why didn't you send the leaflet Have Your Say with your Council Tax invoice? - - Thank you for reading this heart felt email . -</p>	
7	<p>With more and more houses being built in the village and more and more families moving into them, I find it really worrying as to where all the extra school places will be found, how local medical practices will cope with all the extra people wishing to register and how our roads – many of which are in a very poor state and none of which were designed to carry even the current heavy traffic loads – can be expected to hold up under all the extra vehicles !!</p>	
8	<p>I believe Housing and Services are pivotal. - Ensure no more green sites are given over for development whether housing or business.Improve the area by using brownfield sites currently eyesores. - - Give greater consideration to how future developments especially large sites impact on the community they join e,g School, medical,transport.provision. - - In considering the ageing population provide good local facilities including libraries open spaces Community centres adult education. - - Work in partnership with other providers to improve public transport local shops postoffice G.P and Dentist facilities and local policing. - - The emphasis should be placed on support for each community within West Lancs. not just on the major towns ,Ormskirk Burscough and Skelmersdale. - - The older citizens should be able to enjoy a fulfilled affordable and easier life in the place they live. - - In the current climate the villages are losing all their amenities which creates a real risk of considerable negative equity for existing residents but more importantly the demise of the villages. - - In respect of supporting travellers to be blunt why is any required? The citizens of West Lancs pay their Council Tax at an increasing rate and reduced service level each year.Why should any consideration be given to a group who make no contribution.I have no objection to the Travellers should they either settle down in society or not expect others to fund their chosen lifestyle. -</p>	
9	<p>Do not build on greenbelt!</p>	
11	<p>Hi the local plan is a good idea but needs to step up as other councils in England - Are way ahead of west Lancashire council and planning department. Playing - Catch up isn't.showing leadership.the message is clear more housing needs - To be built. - Good luck -</p>	
14	<p>That edge hill needs to become a council partner, work with them - - That transport is very important, particularly cycling, we are a flat landscape. - - That Shale Gas if it can be should be encouraged. - - That students should live on campus</p>	
15	<p>I am writing to enquire over the apparent neglect of the town of Skelmersdale, West Lancashire's biggest settlement, and how this is becoming a more and more apparent issue. - - Recently, Edge Hill University has revealed they are spending more money on their grounds alone whereas Skelmersdale is receiving a smaller sum of money to maintain the whole town. Although I am aware that Edge Hill University is a private business, I find it somehow wrong that almost no money is going to even just maintain the town. - - Ormskirk is a bustling town, with many variations of shops, clean roads, better policing and however more and more money seems to be spent on the town, even completing needless renovations. Skelmersdale has very low policing considering there is considerably more crime, and the town isn't being maintained very well at</p>	

ID	Representor Comments	Council Response
	<p>all, never mind having more money spent on it to further renovate and develop the town. - - There have been reports of children getting jumped, and attacked in the very insecure and terribly lit subways, and yet the council seems to do nothing to improve this, nor even have the urge to want to fix this. - - I remember vaguely an incident in which a vehicle hit a road sign in Skelmersdale and the council took months to acknowledge the matter and replace the damaged sign, whereas I am sure in Ormskirk, it would be replaced in no more than a couple of days or a week. - - The road services are terrible, and the town's only method of public transport, the bus, has equally terrible service, seeming to be cut off from everywhere. Everyone seems to always get excited about the train station, which has been discussed for over four decades now, and it has never happened. - - The healthcare is terrible, and the town's ever growing population is served by a small amount of schools and the fairly recent closure of Glenburn college has had a massive impact on this. - - Finally, I wish to ask you a more personal question, have you ever been to an area of Skelmersdale such as Tanhouse and seen the poverty, the state of the housing, the rising level of crime? And have you seen these rich areas of West Lancashire, Mawdsley, for example, and realised the money keeps on going to them? Have you realised because of your appalling service to places like Skelmersdale it is making poor people poorer and rich people richer? I find it disgusting, do you?</p>	
19	<p>A Long term outlook is essential. - An environmentally sustainable approach is essential</p>	
20	<p>This questionnaire has been completed as a 'joint response' on behalf of Aughton Residents Group (2012) of which I am Chairman. The Consultation events were useful but this online questionnaire has obviously been designed for people who have internet access and computer skills. Many of the persons who should be involved in the consultation would be unable to do so because of its format and complexity. - We look forward to seeing that the contributions made are taken into account and acted upon and our Group will continue to maintain its interest and involvement..</p>	
22	<p>As an environmental scientist I was impressed to learn about the Council's initiation of a broad Local Plan. The issues I find compelling centre on population (strongly linked to global warming and pollution) and energy production. I believe that these issues need to be introduced now into school and further education curricula along with dietary advice in order to educate the next generation about the problems they are facing and the means of tackling them. As a start, every attempt to cut population growth should be encouraged through education. To offset the predicted shortage of younger workers and the increasing use of robots to perform non-innovative tasks, older people volunteering to work longer should be offered re-training programmes. - - The ultimate sustainable source of energy is solar and, although the efficiency of solar cells is increasing, more investment in this field is needed. For immediate application, extensive use could be made of arrays of solar panels raised on stilts and placed so that the land beneath them could still be used for grazing and crop production. The productivity of such land might well be improved through (for example) temperature increases. New housing should be roofed with devices to generate power. Solar power could presently compliment wind-generated power and (through, for example, the use of geostationary satellites collecting infra-red and transmitting microwave energy to ground stations) solar might eventually supersede wind generation. -</p>	
24	<p>I was pleased to be able to take part in the consultation. It is very technical and hard to understand a lot of the issues the Council has to deal with but at least we get the opportunity to have our say.</p>	
25	<p>This representation is asking for a minor alteration to the Green Belt</p>	

ID	Representor Comments	Council Response
	boundary at Appley Bridge to correct what is considered to be an error in the original drawing up of the boundary. - Please see attached SPD letter dated 24th April 2017 and associated Appendix 1 to 3. This correspondence is being submitted further to discussions with WLBC Planning Policy Department.	
26	This is one the easiest and best consultations I have done - thanks	
27	I don't know the answers to the questions in this booklet in this booklet, but what concerns me most is the environment for wildlife. Are there going to green areas left open? Will there be trees planted? - We cant keep building on land and taking natures habitat and it not too have an effect on us all. - Also we have a responsibility to ensure the land and nature is still there for future generations.	
28	The Local Plan is too focused on house building and retail. - Growth in housing needs to be balanced against environmental impacts and infrastructure. - The focus on retail needs to be reviewed in light of the Borough's position in the North West of England and the proximity to City Centres and retail parks out of the Borough. Also changing shopping habits and the growth of on-line shopping should surely be included. - -	
30	Many of the options offered are not mutually exclusive. To make Skelmersdale a commuter town by even temporary better rail links will strengthen the housing market. Equally the document should preface all references to Skelmersdale by "some parts of" when re writing the spatial portrait to reflect adoption, if adopted, of the proposed spatial planning areas of West Lancashire.	
31	Answering these questions has been a long and difficult process with many documents to read in a short period of time. For this reason I doubt there will have been many completions of this survey. - Surely there must be another local authority in the UK that has achieved this important process with good levels of participation. - Please seek out best practice on this process and adopt that.	
32	For a lay person this has been an extremely challenging task. For personal reasons I have become interested in planning and development policy over the part few years and therefore have a little understanding of how planning departments work, but without that knowledge and a determination to have some input I would have given up at the first question.	
33	We attended the meeting at parbold re local plan we found the meeting very interesting and some people had some good ideas we want to live in wrightington as this is where we are from we have land there next to our grand parents but we have been refused planning it doesn't make sense would appreciate any help you can give us	
34	Strategic Flood Risk Assessment Level 1 - The following comments refer to the Strategic Flood Risk Assessment Level 1 - February 2017. Paragraph 2.4 Ormskirk is identified as a minor flood risk area in association with capacity issues and blockage of culverts. - ☒ Suggest removing minor as Ormskirk is a high risk area. - Paragraph 3.12 - Zone 3b – Functional Floodplain - Land where water has to flow or be stored in times of flood. - ☒ Suggest adding 1 in 20 or greater annual probability of river or sea flooding in the Definition column. - Paragraph 5.18 Ormskirk is identified as a minor flood risk area in association with capacity issues and blockage of the culverts, particularly the A59 culvert. - ☒ Suggest removing minor as Ormskirk is a high risk area. - Paragraph 6.3 However, these EA Flood Maps do not consider the presence of flood defences (see following Section 8) nor do they take into account the future impacts of climate change - ☒ Suggest change of wording after (section 8) to 'nor do they visually show the future impacts of Climate Change'. - ☒ Suggested this change because climate change is taken into account, but is not shown on the maps. - Paragraph 6.6 - It is also of note	

that there is a risk of fluvial flooding at Mill Bank, Appley Bridge from the River Douglas and Calico Brook which could be deep, fast flowing and fast onset. Calico Brook is diverted into East Quarry at times of high flow to reduce flood risk. - ☐ Suggest removing 'the River Douglas and' as Mill Bank is not at flood risk from the River Douglas. - ☐ The recent WLBC scheme changed the diversion into East Quarry, suggest speaking to David Owens, West Lancashire. - ☐ Recommend adding that Parbold is at flood risk. - Paragraph 6.17 A critical Drainage Area (CDA) is defined as “an area that has critical drainage problems and which has been notified to the Local Planning Authority as having such problems by the Environment Agency.” - ☐ This is in the instance where an area is impacting main river downstream. The LPA may designate their own CDAs. - Paragraph 6.9 - We would recommend that the SFRA defines Flood Zone 3b functional floodplain. To do this you could use the 1 in 20 modelling data from ourselves which can be obtained from data.gov.uk or use a proxy based on NPPF. An example of this could be undeveloped land in FZ3. - Paragraph 8.1 The Environment Agency (EA) is currently developing a Flood Warning Area for Ormskirk which will notify residents of potential flooding events. - ☐ The Flood Warning Area has been developed - Paragraph 8.2 – 8.11 - ☐ This information is outdated and is not relevant anymore. Would recommend it is removed. Updated information can be provided if needed, but property numbers should not be expected. - Paragraph 8.13 These defences consist of a pumping station and lengths of levees and protect the settlement of Great Altar - ☐ Suggest replacing levees with embankments - ☐ Spelling error of Altcar - Paragraph 8.14 ...these defences are constructed to protect against a 1 in 50 year flooding event. - ☐ This is a broad statement. Suggest removing the 1 in 50 year quote. - Paragraph 10.7 Ormskirk has a risk from non-fluvial flooding incidents; this can be down to the historic nature of the town with older drainage systems... - ☐ Suggest adding a comment about the interaction of the older drainage systems and Sandy Brook. - Paragraph 10.11 Parbold is located in the east of the Borough. Directly adjacent to this settlement lies the River Douglas and Dock Brook which are noted to have some associated risks from fluvial flooding, most recently flooding occurred in December 2015. In this area raised embankments adjacent to the river offer protection from a 1 in 40 flooding event. - ☐ Suggest removing as there are no defences here. - Paragraph 10.13 In addition, Calico Brook has been identified as a particular flood risk (given potential depth, speed of flow and speed of onset) with diversions into East Quarry at times of high flow. - ☐ Suggest removing as there is no longer a diversion into East Quarry. Refer to the scheme WLBC built. - - 'Thematic Spatial Evidence Papers' - We offer comments on the following Thematic Paper: - - 8.0 Water Quality and Resources - We feel that this paper could go into more detail as the Borough have at risk waterbodies. We recommend that there is a stronger focus in this section on summarising the current status of the specific waterbodies within West Lancashire’s Local Planning boundaries. This should include a discussion of why only 93% of Alt Crossens waterbodies and 96% of the River Douglas waterbodies are currently in less than good condition. - - The baseline summary section should also contain a link to water quality and water resources status information in the Northwest River Basin Management Plan document –relevant waterbody pages in Annex B. - - Section 8.5 Local Plan Issues - From a biodiversity point of view, drainage for agriculture and 3rd party watercourse maintenance are topics that could do with a closer look if we are to adequately protect waterbodies as ecologically functional habitats. Watercourse buffer zones need to be strengthened. - - Drainage has led to peat shrinkage which, without interventions will continue to cause management problems in the future. - - There are some tough challenges to improving the ecological functionality in West Lancashire. We would recommend that this needs to start with a recognition of where we are in terms of physical environment and general land levels issues. - - If you have any queries on our response or would like to discuss any of the topics raised in terms of collaborating as part of your Local Plan development we would be happy to assist.

ID	Representor Comments	Council Response
35	<p>We reserve the right to make further representations in the future and consider that the publication of the LCR SHELMA for consultation (currently due Spring 2017) will be important for the progression of the Local Plan Review. Therefore, further consultation on the Local Plan Review should also be undertaken at this time by West Lancashire Borough Council. - We would like to take this opportunity to thank West Lancashire Borough Council for the opportunity to provide representations on the Local Plan Review: Issues and Options. We hope the above is of assistance, however, if WLBC require any further information please do not hesitate to contact us.</p>	
37	<p>Thank you for giving Scarisbrick Parish Council the opportunity of feeding back what the Council believe to be the main issues affecting our Parish. - The following 4 areas were seen by the Parish Councillors as needing consideration in any forthcoming borough plan. - 1 FLOODING - Flooding has been a hot topic for the last few years in West Lancashire as rainfall totals have appeared to increase with what is deemed to be climate change. - Added to this, the proposed shut down of the 5 pumping stations in the Alt Crossens catchment area has highlighted the risk of flooding in Scarisbrick and the surrounding villages. Whilst the Environment Agency claim that residential properties are not at risk of flooding once the pumps are shut down, this is very much doubted by the residents of Scarisbrick. Large parts of the Village sit at, or below sea level. Many acres of the rich farmland of the Parish have been created by draining marshland over 200 years ago. - Whilst appreciating the needs of the Borough Council to build more housing across West Lancashire, Scarisbrick Parish Council is very concerned that such developments will invariably create additional water which has to be pumped out to sea to the west. As most of the larger developments being planned in West Lancs are to the east of Scarisbrick, this ultimately means additional water being channelled through the Village which will undoubtedly put residents and farmland at an increased risk of flooding. - As the Parish Council has previously mentioned, a formal flood risk policy should be written into any new plan with specific attention given to 'off-site' flooding. - Whilst Scarisbrick Parish Council understands the principal of sustainable development, it should not come at a price which may jeopardise the safety of Scarisbrick residents and their businesses. - 2 ROAD INFRASTRUCTURE - The roads through the Village were largely built many decades ago to serve a rural community. As such, there are many roads which are only marginally wider than single track. - The main A570 cuts through the Village linking Ormskirk to Southport and this road is in a reasonable state of repair and has seen reductions to speed limits and a speed camera to aid the overall safety of this stretch. - However, sustained development in the neighbouring council of Sefton has contributed to congestion on the A570 with increased use of Moss roads. Councils have a duty to 'co operate' yet we have not seen any evidence of this issue being addressed. - The numerous B roads in the Parish have fewer limitations on speed and are seeing increases in traffic volumes generally, both due to rises in population and also they are being used as 'back' routes to Southport to avoid the A570 which is notoriously grid locked in the busier summer holiday times. - Many of these B roads are in a very poor state of repair and require a radical overhaul to fix the many pot holes evident and also require re surfacing to make them fit for purpose. They also need widening as wagons and farm machinery have increased significantly in size since these roads were created. - A further concern is for the safety of the increasing number of cyclists using village roads. Such cyclists are at greater risk than ever before of injury due to room constraints as large commercial vehicles pass them. The cyclists also have to avoid the above mentioned pot holes which can cause them to swerve without undue warning to passing vehicles. - For similar reasons, many pedestrians feel compromised walking through the Village as cars speed by in close proximity. - 3 HOUSING - At the last census of 2011 there were 3,865 living in the Ward of Scarisbrick, spread out over a land area of approximately 3,207 hectares which equates to a density of 1.1 people per hectare. - Such</p>	

ID	Representor Comments	Council Response
	<p>a low density is due to the large area of land used for farming. Clearly Scarisbrick is a village with a proud history of a buoyant agricultural industry, benefitting from many hectares of prime agricultural land. The sector still accounts for the generation of wealth in the area and is a significant employer to the residents. - Property across the Parish is well spread with the Parish having no discernible centre, rather having what are known as neighbourhoods which total nine. Latest market figures for house prices in Scarisbrick show that the average is £214,619 – with the cheapest housing reported being terraced properties which average £180,500. - Such a market is not seen to be affordable to the first time buyers of Scarisbrick who have little option but to either pay high rents or move to nearby towns such as Southport, where housing is significantly cheaper. As such, the Village loses ‘born and bred’ locals to the detriment of the Parish as a whole. - For the same reason, older residents who may wish to retire have little opportunity of downsizing and purchasing retirement property to stay within the Village. - The overall result is that housing stock within the Parish is outside the reach of the local population and local services are eroded as shops, post offices, and police stations are converted to dwellings. This leads to lack of community cohesion and an unsustainable reliance on motor vehicle and public transport. - As such, the Council would see that any long term plan for increasing housing in the Parish is done on the basis that affordable schemes are prioritised, rather than being paid ‘lip service’ to meet a pre determined quota. These aims can be met by a full revision of the housing allocation policy. - - 4 VILLAGE SERVICES - Given that Scarisbrick has an ageing population – over 20% of the residents are now retired or above the retirement age. - There is growing concern of the access to Health Care in the Village. There are no longer any primary health care providers in Scarisbrick, leaving residents with no choice or alternative but to travel to Southport, Ormskirk or Burscough. - For older people who rely solely on Public transport, this is a far from satisfactory situation and one which causes great anxiety. -</p>	
38	<p>Thank you for consulting Knowsley Council on the Issues and Options for the West Lancashire Local Plan Review. We recognise that there are a number of Issues and Options Papers have been published as part of the consultation. Our focus has been the review of the Strategic Development Options Paper, which we consider has most relevance to sub-regional and cross boundary issues of interest to Knowsley Council. - We appreciate the need for West Lancashire to plan to meet its objectively assessed needs for new residential and employment development, in accordance with the National Planning Policy Framework (NPPF). We are generally supportive of the principle of West Lancashire growing in accordance with its identified needs and ambitions. - As you will be aware, Knowsley Council adopted its Local Plan Core Strategy in January 2016. This Plan secures Knowsley’s ability to meet its own needs and demands for new housing and employment development up to 2028, without the need for assistance from neighbouring authorities. Therefore, given our current policy position, we do not require West Lancashire to meet any of Knowsley’s development needs. - - Notwithstanding this, we are looking forward to working with our Liverpool City Region partners, including West Lancashire, on finalising the Strategic Housing and Employment Land Market Assessment (SHELMA), and any subsequent work on disaggregating development needs identified in this assessment. We would strongly support the commentary at paragraph 3.2.11 of the Strategic Development Options Paper, which describes the intention to work with neighbouring authorities to finding the best solution to meeting any unmet needs and demands for the Liverpool City Region. We consider that that the SHELMA, and any subsequent work on disaggregation of unmet needs and demands, will need to be completed prior to us being able to express a preference for any of the Strategic Development Options proposed by West Lancashire. - With respect to the options for Local Plan periods proposed at section 3.3.1 of the Strategic Development Options Paper, we note that the second option being considered is a plan period which runs to 2050. This is considered to be an</p>	

ID	Representor Comments	Council Response
	<p>extremely lengthy period, well beyond usual Local Plan timescales. Indeed, as this is beyond the period - covered by the SHELMA (which covers the period to 2037), West Lancashire Council - may find it difficult to forecast in spatial planning terms need for housing and employment - development up to 2050. - We appreciate that the NPPF requires local planning authorities to release sufficient land - to meet longer-term development needs, when altering Green Belt boundaries, and that a - longer plan period would provide more long term certainty. However, our recent - experience with the preparation of the Knowsley Local Plan, which included a plan period - up to 2028, was that only one housing site was required to be safeguarded beyond the - plan period, supplying three years' worth of additional housing land. This approach was - found by an Inspector to be an "appropriate" and "reasonable" response to the NPPF's - objectives. Given this, we consider that the option of a plan period up to 2050 has a high - risk of being considered unacceptable. This is due to the lack of certainty regarding - needs and demands for new housing and employment development so far into the future, - and the subsequent difficulty in meeting the NPPF's "exceptional circumstances" test to - release land from the Green Belt - We look forward to continued involvement in the preparation of the West Lancashire - Local Plan Review and its evidence base. We confirm that our central areas of interest - remain strategic housing and employment issues, including planning for Gypsies and - Travellers. This is in view of our priority to ensure any impacts on Knowsley's - communities, or on our shared housing and employment market areas, are addressed.</p>	
40	<p>These representations are submitted on behalf of our client, Stretton (Ormskirk) Ltd. We note that as part of the SHELAA consultation, the Council is undertaking a further call for sites which will in turn inform future Allocations. - Our clients site at Cross Hall Brow, Ormskirk, is well known to the Council (SHELAA Ref. OA.050). Our client has instructed numerous technical investigations that will be supplied to the Council over the coming months to demonstrate site suitability and Deliverability. In terms of nature of development proposed, our client wishes to bring forward a mixed residential scheme that would provide high quality market, affordable, elderly and specialist elderly accommodation – a site Masterplan will be provided to the Council shortly. - Our client is satisfied from technical investigations undertaken to date the site is deliverable and the form of development outlined above is viable. In addition, there is a clear need for the mix of housing proposed which is not currently being achieved from those sites Allocated under the current Local Plan. - General Comment - At paragraph 1.1.5 of the Strategic Development Options Paper comment is made that the Local Plan is not out of date. It is however clear that some policies contained within the Local Plan are not meeting the set objective (for example the provision of affordable and elderly accommodation), as a result such policies within the Local Plan are failing and by virtue must be regarded as out of date and in need of urgent review. Whilst our client appreciates the current consultation is reviewing such policies, it should be made clearer in this pre-text what policies are currently failing to deliver the stated objective and therefore are in need of urgent review / amendment or replacement.</p>	
41	<p>I am sure that many people will focus on other topics so my comments relate mainly to climate change and the environment . - - We know that climate change is an important problem but the recent floods in the area suggest there is much worse to come . As there is also a clear need to provide more and affordable housing in the area I believe it is important that there should be greater emphasis on the quality and energy efficiency of such housing . As an example the new development in Charnwood Close in Burscough is perhaps an indicator of how we should proceed . Before re-development this was a derelict site and perhaps a net absorber of carbon dioxide but after its re-development I estimate that these houses will emit in total somewhere in the region of 20 tonnes of carbon dioxide per year .</p>	

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	<p>As it is estimated that 1 tonne of carbon dioxide will cause about 3 square metres of sea ice to melt each year a considerable amount of ice will disappear over the coming decades just due to this small development . - - Likewise the development in Burscough in and around Ainscough's old mill also suggest that more needs to be done . It seems that the EPC rating of the new flats may be actually worse than that of another older renovation and of course the derelict area surrounding the mill was probably also a net absorber of carbon dioxide as well . The situation of green field sites is even worse as it is clear that there will be net absorption before building and substantial emissions afterwards unless great pressure is placed on builders to act more responsibly . If on the other hand builders of affordable housing and other houses can be encouraged to build such housing with integrated solar panels this means lower fuel costs for the eventual owner and possibly even lower taxes for council tax payers . Of course if many of these new houses are low to zero emissions then we will need less wind turbines which some will appreciate on aesthetic grounds and it is therefore clearly a win win situation . - - Whilst litter is a continuing problem and difficult to deal with I wonder if it might be possible to extend the number of plastic containers that can be recycled particularly as the number of products in plastic seems to be increasing as an ever faster rate . Alternatively I would hope that large shops and supermarkets could be badgered into using recyclable materials rather than going for the cheapest and in some cases removing some or all the packaging altogether . Do we really cardboard sleeves on top of plastic tubs ? -</p>	
42	We have no general comment at this time.	
43	<p>Lancashire County Council (LCC) School Planning Team (SPT) would like to thank WLBC for the opportunity to be included in the consultation and respond accordingly. Having the opportunity to respond to the consultation allows LCC to provide the current situation within mainstream schools and the impact housing developments will have on future capacity and school place provision. - Currently LCC School Planning Team are consulting on the draft School Place Provision 2017/2017 to 2019/2020. The consultation document has been sent to all partnering planning authorities. The document will highlight the increasing financial challenges faced within local authorities and the education provision across Lancashire. You can review the consultation using the link below: http://www.lancashire.gov.uk/council/performance-inspections-reviews/children-education-and-families/school-organisation-reviews/draft-school-place-provision-strategy-201718-to-201920.aspx - Overall Summary - Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. Some children have Special Educational Needs for which they access school provision outside of Lancashire. Special Educational Needs provision is managed by LCC's SEND Team and is not covered by this response. - The Strategy for the provision of school places and school's capital investment 2015/16 to 2017/18 provides the context and policy for school place provision and schools capital strategy in Lancashire. Over the coming years Lancashire County Council and its local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system that is fit for purpose, stable, and delivering the best possible outcomes for children and young people. - Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place. - In a recent letter from the DfE to all local authority Chief Executives, the Minister of State for Housing and the Parliamentary Under Secretary of State for Schools jointly stated that</p>	

ID	Representor Comments	Council Response
	<p>'where major new housing developments create an additional need for school places, then the local authority should expect a substantial contribution from the developer towards the cost of meeting this requirement.' - The SPT produces an Education Contribution Methodology which outlines the - Lancashire County Council methodology for assessing the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers. - In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with Lancashire County Councils Home to School Transport Policy. Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are: - • Already over-subscribed, - • Projected to become over-subscribed within 5 years, or - • A development results in demand for a school site to be provided. - - Lancashire County Council School Planning Team would like to thank WLBC Planning Department again for the inclusion in their latest consultation and for their continued support in the provision of education place planning in West Lancashire</p>	
44	<p>We have a very good quality of life in Lancashire, but we do need to continue to make progress -- for all residents. These are carefully thought out targets which I would be willing to discuss with you at any time. Resident since 1982.</p>	
46	<p>The regeneration of Skelmersdale should play a central role within the Local Plan and due to the size of the task the LP should be extended to 2050. - The challenges of the environmental improvements needed and Housing /employment issues needed to be addressed are counter-balanced with the huge potential of Skelmersdale which now has an enviable position within the North West Region with all the basic features that could put it at a huge advantage. In short, the original development of Skelmersdale needs finishing but within the modern day context of utilising the 'Garden Town' design - The 'branding' image of Skelmersdale can be transformed through developing a long term plan which addresses the shortcomings and builds on a positive 'Growing from the Green' image by attracting new industries, housing and 'Garden Villages'. A boost in confidence in Skelmersdale will result in an even larger boost in the confidence of theBorough of West Lancashire.</p>	
48	<p>The economic issues are fairly complex and not so easy to address. Finding the relevant background policy options and being able to refer to them as part of this consultation response requires diligence and some computer skills that would daunt a fair section of the community. - Whilst we appreciate the efforts made to make the issues understandable, more work is needed to instruct consultees on how to access the relevant policy options and flick between these and the consultation questionnaire.</p>	
49	<p>Thanks for the opportunity to have a say in our town's future plan. - I have lived in Skelmersdale since 1970 and can honestly say I have not looked back. My husband and I have always been employed, my children have had a fantastic education and we had an opportunity to have a better future. - However I feel increasingly saddened that that bright future was stripped away from us and we are just a forgotten town instead of a progressive new one. - We need to get back to basics and invest in our people, let's be proud once again. - I totally agree with what you have in mind. First educate, second invest in employment opportunities for those educated children and provide them with good housing and amenities to help retain and build our town. - We also need to think what our communities need..... not rocket science but someone with a vision to help make it possible. - We sadly lack in venues for the young be it sporting, creative or social. We lack support for the elderly and disabled. We lack good quality shopping(so our money is spent outside the town). We don't have a hospital.We don't have</p>	

ID	Representor Comments	Council Response
	<p>a cemetery..... - Bearing that in mind if you had a business would you invest????????? - I look forward to positive thinking bringing positive action. -</p>	
50	<p>Thank you for inviting Highways England to comment upon the Issues & Options stage consultation of the Local Plan review for the Borough of West Lancashire. - Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015. Highways England is responsible for operating, maintaining and improving the SRN in England, in accordance with the Licence issued by the Secretary of State for Transport (April 2015) and Government policies and - objectives. - Highways England’s approach to engaging with the planning system is governed by the advice and guidance set out in The Strategic Road Network Planning for the Future - A guide to working with Highways England on planning matters (2015). - The document is written in the context of statutory responsibilities as set out in Highways England’s Licence, and in the light of Government policy and regulation, including the: - National Planning Policy Framework (NPPF); - Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development (‘the Circular’). - Overview Highways England has undertaken a review of the West Lancashire Issues & Options Consultation Local Plan. The consultation documents consist of a number of topic papers rather than one draft document, and also include a number of supporting documents to provide the - underpinning evidence for the development aspirations and policies for the Borough, which are - also to be reviewed where relevant. The documents to be reviewed therefore include: - Strategic Development Options Paper; - Economic Policy Options Paper; - Environmental Policy Options Paper; - Social Policy Options Paper; - Infrastructure Delivery Plan 2016/17; and - Transport Thematic Paper. - Our review has centred on identifying whether the aspirations, policies and allocations within the documents presented to us by West Lancashire Borough Council create a potential for there to be impact upon the safety, operation and capacity of the Strategic Road Network (SRN). - There are few SRN routes in and around West Lancashire; the M58 runs across the southern boundary of the Borough in a roughly east-west alignment, through the southern extent of Skelmersdale, while the M6 lies just to the east of the Borough boundary, providing north – south connectivity. - It is understood that the M58 is currently considered to generally operate within capacity, although there are localised issues at the terminus junctions, in particular at Switch Island (the confluence of the M58, M57 and a number of ‘A’ roads). There are also operational and safety concerns at junction 26 (the eastern terminus of the M58) and junction 27 of the M6. Whilst only junction 27 of the M6 lies within the Borough boundary, there is potential for the development aspirations of the Borough to have an impact upon the wider SRN outside of the Borough. - At this early stage in the development of the Local Plan, it is Highways England’s role to provide initial comments, raise potential issues and make recommendations where appropriate. - Highways England’s key guidance document, The Strategic Road Network: Planning for the Future (2015) states that: - “The preparation of local plans provides an opportunity to support a pattern of development that minimises the need for travel, minimises journey lengths, encourages sustainable travel, and promotes accessibility for all. This can contribute to the achievement of environmental objectives and reduce the cost to the economy arising from the environmental, business and social impacts - associated with traffic generation and congestion.” - Paragraph 65 sets out the role of Highways England take in facilitating this: - “For all these reasons we are keen to contribute to the plan-making process. We can help you identify the most suitable locations for development that make best use of the capacity on the SRN, so encourage you to engage with us from the earliest stages of thinking.” - At this early stage in the Local Plan process, the evidence supporting the emerging Plan is very much in its inception</p>	

ID	Representor Comments	Council Response
	<p>phases. The documents do not set out any allocations or their potential uses at this stage, and instead offer various strategic scenarios for consideration. In accordance, the - comments made at this stage will be of a correspondingly high level. - The review will also pay cognisance to Paragraph 67, which states that: - "In supporting and considering draft local plans, we will seek to influence the scale and patterns of development so that it is planned in a manner which makes best use of capacity on the SRN and will not compromise the fulfilment of the primary function of the SRN. Ideally, development locations should be chosen that would minimise the need for travel and facilitate the use of - sustainable transport." - Therefore, while it is recognised that the location of towns such as Skelmersdale present opportunities to capitalise on the connectivity of the SRN, it is also essential to ensure that every step is taken to minimise unnecessary travel and to promote the use of the SRN in a sustainable manner. - - As we expect at this early stage in the Local Plan process, the Issues & Options draft covers topics such as the scale of development, location for development, and the duration of the plan period within the Borough, but does not yet provide certainty over West Lancashire Borough Council's preferred approach to these. Furthermore, whilst there is an identified potential - requirement to accommodate the unmet needs of the LCR, it should be noted that many of the Boroughs within the LCR are still in the process of producing Local Plans or Core Strategies. - The Strategic Development Options Topic Paper presents three 'variables' concerning the amount and distribution of growth in the borough, and the length of the plan period, which will run from 2012 to either 2037 or 2050. - These Strategic Development Option 'variables' present the potential for significant development around Skelmersdale, an area targeted for regeneration and with the strongest links in the Borough to the SRN. In this context, we believe the needs of both the Borough and the unmet needs of the LCR for employment land, particularly large-scale logistics, are likely be focussed around Skelmersdale. - However, the implications for the SRN are not necessarily focussed solely on Skelmersdale. - Especially under variables for higher levels of development and a longer plan period, there is potential for development throughout the Borough, and possibly for an entirely new settlement. It is noted that at this stage, there is no clarification on where such a settlement would be located. - While Highways England does not seek to discount particular locations for development simply because it increases demand for the SRN, it is essential to encourage patterns of development that promote sustainable travel and minimise the necessity to travel on the SRN. - It has already been identified through discussions between Highways England and West Lancashire Borough Council that the preparation of the highways evidence to support the Local Plan is in its early stages, with the documents presented as part of the consultation discussing the - existing provision and current issues, in addition to presenting data on travel patterns and demographics, rather than identifying any future requirements. - Highways England will work as a proactive partner with West Lancashire Borough Council in formulating its evidence base for site allocations and policy requirements. Although certain strategic development options are immediately likely to be more sustainable, it is impossible to categorically discount or firmly support any options without a robust evidence base. - It is essential that this evidence base takes into account the significant cross-boundary movements between the Borough and its neighbours, and the potential for increased freight and HGV movements along the M58 corridor. While the M58 could be considered to be under-capacity, the potential development in both West Lancashire and the LCR - presents the potential for significant impacts outside the Borough boundaries at the M58 terminus junctions, particularly at Switch Island. Furthermore, dependant on the strategic development variables chosen, significant development to the north of the Borough could increase demand at junction 27 of the M6 (particularly if this were not progressed in a sustainable manner) and result in increased commuting toward Preston and Chorley. -</p>	

ID	Representor Comments	Council Response
51	<p>I understand the 3 main themes of the local plan are Residential, the Economy and the Environment. - I have read the leaflet and considered the over-riding issues that will impact on the plan. - - It would seem to me that the greatest area of need is to use the plan to boost employment, and make residential development more attractive in Skelmersdale. This is important in order to improve the town's image and even out the inequalities that exist within the Burgh. - This is a difficult task, a situation that has not improved over decades. - It would seem to me that the overarching problem is centred around the inequality in educational aspirations and opportunity. Skelmersdale exports its most able students post 11 to Ormskirk, Burscough, Upholland, Rainford, Shgevington, Orrell and other localities, at great monthly costs to the parents. The consequence of this, is that those left behind are not a cross section of any community, they tend to be the most vulnerable, from less affluent homes. This results in the secondary schools having great difficulty in meeting Ofsted's "good" criteria, resulting in a downward spiral of aspiration and reputation. This has dire consequences for the workforce and residential land values. - To be clear, "good" schools raise land and property values, create a skilled workforce and a buoyant economy, and a joined up community. - It is urgent that all those involved in the plan get their heads together to find ways to encourage the town's parents to invest their children's education in the town, for the future economic wellbeing of the wider community. - If the town is to grow, then the old Glenburn site must be retained at the heart of the community for future educational needs. The site should be removed from its Town Centre classification and protected. It makes no sense for the most deprived to have to travel to the other side of town. Nor does it make sense that the Burgh's roads are choked by parents ferrying children miles to school. - - We are lucky that West Lancashire is the green lung between large urban areas of Merseyside, Greater Manchester and Central Lancashire. In spite of obvious pressures long may it stay that way. Though I accept that villages in the green belt will need to grow to be sustainable, the green belt must be maintained. Settlements need to maintain their identity and not merge. Ormskirk is all but one field away from Burscough, and Dalton has only a "protected field" from Skelmersdale. - Most of the Burgh is grade 1 and 2 agricultural land, with the uncertainties of Brexit, it is important that it is maintained for farming purposes. I support the idea of renewable energy, but it must not conflict with the rural environment or the green belt. Renewables should form in the main, part of the built environment. Solar panels are for the roofs of factories and warehouses, build into the new housing stock, or lining our industrial area. Biomass could heat housing complexes, and wind turbines need to be in scale with the industrial environment they provide energy to serve. - - Thank you for giving us the opportunity to give views at this stage in the plan. I look forward to expand these ideas at any time within this round or the next of the consultation process.</p>	
54	<p>Cushman & Wakefield has been instructed by Newtyle Property Company to submit representations in - relation to the current consultation on the West Lancs Local Plan Review: Issues and Options Papers. - Background - Our client owns land and property at Derby House, Mossey Lea Road, Wrightington. The site is currently - occupied by a single storey building containing successful local retail facilities. Our client also owns - approximately 6 hectares of agricultural greenfield land located adjacent to Derby House as shown at - Appendix 1. - Representations - These representations provide comment on the following issues identified within the Strategic Development - Options Paper: - 1. Issue 1 – Amount of development land - 2. Issue 3 – Distribution of new development - 3. Issue 4 – Location of new development - - In summary, our representations provide comment on the issues and options presented in the current West Lancs Local Plan Review: Issues and Options Papers, particularly the importance of Derby House to the local economy, and the availability of the adjacent 6 hectares of land for future development. - Alongside this</p>	

ID	Representor Comments	Council Response
	<p>representations, we have also submitted Derby House and land at Derby House, Wrightington to the SHELAA consultation for further consideration of its suitability for development. - We respectfully request that we are kept informed as to the progress of the West Lancs Local Plan Review, including being notified of future opportunities to comment.</p>	
56	<p>These representations have been prepared by Lichfields on behalf of Taylor Wimpey UK Limited [Taylor Wimpey]. They form Taylor Wimpey's response to the West Lancashire Local Plan Review Issues and Options Consultation and are submitted to West Lancashire Borough Council [WLBC] for consideration in the formulation of a new Local Plan for the Borough. - These representations are submitted in the context of Taylor Wimpey's interest in several parcels of land at Appley Bridge. In respect of the land at Appley Bridge, comments are also being made to the Strategic Housing and Employment Land Availability Assessment [SHELAA] consultation alongside these representations. - Taylor Wimpey welcomes the early review of the Local Plan and the pro-active approach being taken by the Council to ensure that the Local Plan is up-to-date and embraces the concept of sustainable development. - These representations mainly focus on the Strategic Development Options Paper [SDO Paper] but comments are also provided on specific relevant issues raised in the following: - 1 Spatial Portrait Paper; - 2 Environmental Policy Options Paper; - 3 Social Policy Options Paper; and, - 4 Duty to Co-operate Statement. - In this context, Taylor Wimpey reserves the right to comment in greater detail on specific issues raised in any of the Papers at subsequent stages in the formulation of the New Local Plan. - - The Framework [§178-181] covers 'planning strategically across local boundaries' and sets out a requirement for local planning authorities [LPAs] to demonstrate evidence of having effectively co-operated to plan for cross-boundary issues when their Local Plans are submitted for examination. In order to ensure that the new Local Plan can be found sound at examination, the Council must work with neighbouring authorities, and provide evidence of doing so as part of the plan-making process. - The process for preparing the Local Plan accords with the requirements of the Planning and Compulsory Purchase Act 2004, and is therefore generally supported by Taylor Wimpey. - - Taylor Wimpey also welcomes the Council's approach to the Duty to Co-operate set out in the Duty to Co-operate [DtC] Paper and §1.1.11 of the SDO Paper and in particular welcomes that WLBC has signed the Liverpool City Region [LCR] Statement of Co-operation. - Taylor Wimpey agrees with §2.10 of the DtC Paper which states that: - "From a strategic planning perspective, the Council 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." - It is noted that Table A of the DtC Paper identifies the following: - 1 Green Belt release may be required in West Lancs to meet housing need and ensure flexibility in delivery; and, - 2 WLBC will maintain on-going dialogue with the other authorities in the LCR and formal consultation with neighbouring authorities through the Local Plan Review 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. - Taylor Wimpey supports the Council's acknowledgment that West Lancashire may need to accommodate some of the unmet housing need from the Liverpool City Region and that Green Belt release may be necessary in order to do so. - - These representations form Taylor Wimpey's response to the West Lancashire Local Plan Review Issues and Options Consultation. - Taylor Wimpey welcomes the early review of the Local Plan and the pro-active approach being taken by the Council to ensure that the Local Plan is up-to-date. - The Local Plan should set a housing target higher than the OAN to provide enough flexibility and choice to help ensure that enough housing is delivered over the plan period. The OAN for housing should be based on robust evidence and should align with the OAN for employment land for the Borough. Furthermore, the Council must consider meeting any unmet need from neighbouring authorities in</p>	

ID	Representor Comments	Council Response
	<p>the LCR as part of the overall housing requirement and Taylor Wimpey welcomes the Council's approach to the Duty to Co-operate in this regard. - The plan period should last for a minimum of 15 years and it is welcomed that the Council is considering an extended period to 2050. In any case, the Council should retain the approach taken in the currently adopted Local Plan with regards to safeguarded reserve sites to provide greater flexibility. - Whilst the focus of new development in the new Local Plan may be the key service centres, the Council must ensure that the sustainable growth of other settlements in the Borough is adequately supported by distributing an appropriate level of development to the more rural areas. - The Local Plan should not impose, through policy, any additional burdensome requirements on developments in terms of energy performance or accessibility. - We trust that these representations will be fully considered in the formulation of the new West Lancashire Local Plan and would be grateful if you could keep us informed as to the details of the next stage of consultation.</p>	
57	No	
58	<p>1. Thank you for consulting the Home Builders Federation (HBF) on the issues and options papers for the West Lancashire Local Plan Review. - 2. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock. - 3. We would like to submit the following brief comments to selected questions from the issues papers. A more detailed response will be provided during later stages of plan making. The following comments are organised under the relevant questions and headings of the various issues papers. - - The HBF is pleased to note that the Council has produced a Duty to Co-operate Statement at this early stage of the plan review. The statement clearly indicates that the Council is working with neighbouring authorities upon a number of significant cross-boundary issues, including the preparation of joint evidence. Successful compliance with the requirements of the duty will be dependent upon how the plan responds to the issues identified. - 5. The main concerns of the HBF relate to housing need and delivery. In this regard we are pleased to note that the Council remains committed to the Liverpool City Region (LCR) Strategic Housing and Employment Land Market Assessment (SHELMA). The HBF understands that a draft of this report will shortly be consulted upon. The SHELMA will have significant implications for West Lancashire and LCR authorities and will need to be given full consideration at the next stage of consultation upon the plan. In terms of the duty to co-operate, as recognised by paragraph 3.2 of the Duty to Co-operate Statement, West Lancashire will need to determine not only whether it can meet its own needs but whether it will be required to assist in meeting the needs of other LCR authorities. The Council will also be required to consider other neighbouring authorities who are not part of the LCR. - - I would be happy to discuss any of the above comments in greater detail. The HBF would also like to be kept informed of future progress upon the Local Plan Review and associated documents and provide contributions to their production, as appropriate.</p>	
59	<p>There has been considerable confusion about the use of "Review" in the title of this proposal. What is proposed is not only a Local Plan lasting at least ten years beyond the term of the current, adopted, version but possibly one lasting thirteen years beyond that. However, this contrasts starkly with the reason stated for carrying out this exercise now (changes in Government policies). What is there to stop a new Government introducing further major planning policy changes after the imminent General Election, or after the General Election following that? The current Local Plan was considered to be 'sound' by a Government Inspector and was adopted only four years ago. It contains the statement (at 3.3) "As preparation and</p>	

implementation of the Local Plan progresses, the indicators and targets may be revised in accordance with the Plan-Monitor-Manage Guidance”, so there is no overriding imperative to rush into preparing a completely new plan now, flawed though the existing Plan is, in our opinion. - - During preparation of the 2012-2027 Local Plan and through to the Local Plan Inquiry in 2012, we pointed out the folly of concentrating development targets so strongly on Skelmersdale and events since then have proved us right. There is still no town centre development, nine years after the SPD was adopted; the concept of that development has changed out of all recognition and not for the better. Deprivation in certain areas continues and the run-down housing estates are still present. In addition, a vital opportunity to re-configure and improve the out of date industrial sites while there were many empty properties (see Local Plan adopted in 2006) has been missed. - We pointed out in 2012 that the housing numbers would not deliver the right types and numbers of homes in the right places and, especially, that plans for delivery of affordable housing were “pie in the sky”. The outcome, as we predicted, is that developers have been concentrating on building expensive three- and four-bedroomed homes at market prices, when 70% of the need was stated to be for truly affordable homes; the target proposed was for new housing to contain 35% affordable units, with no means of enforcing even that figure. The inevitable result will be an over-supply of expensive, unaffordable, market housing which will do nothing to meet local needs. Perversely, this current Local Plan directs the majority of housing development to the area of lowest need for affordable housing (Skelmersdale), which also happens to be the least sought-after for market-priced housing. It is not difficult to see why this approach has not been working. - - It defies logic to state that there should be a massive over-supply of market priced houses, just to deliver the right number of affordable homes. With the approach being adopted by developers of (reluctantly) providing a 10% “affordable” content of their estates, when the need is for 70% (as stated at the 2012 Inquiry), that would mean building seven times as many market priced houses as are needed, just to supply enough affordable homes. Most strikingly, such an approach will lead to severe waste of development land and possibly the eventual collapse of the market for speculatively-built housing in the Borough. More likely is that development will be constrained by developers to match market-priced demand and the local need will remain unmet. This would entail large numbers of people moving into West Lancashire from other areas and commuting daily out of the area to their existing places of work. That is not planning for success! - - The current Plan provides a review process for housing development sites. It includes “plan B” sites which have come under pressure from developers to be brought forward and which the Borough Council has had great difficulty in defending. This is a direct result of over-forecasting the local need for market-priced housing and treating the whole housing market as a single entity. - The objective of avoiding well-qualified young people having to move out of West Lancashire will not be achieved unless homes which are affordable are made available and in the locations where they want to live. Affordability relies on pay rates, which in turn rely on the types of employment which are available. Unfortunately, agricultural occupations are too few and too poorly-paid, whereas retail and logistics jobs are just too poorly paid. It is the large cities that have better-paid jobs but why should young people commit themselves to long and expensive daily commutes along congested roads or on unreliable and increasingly scarce public transport, in order to take on those jobs? Outward movement of such people seems inevitable. - - For those young people who do stay within the Borough there has to be more imaginative thinking about where, and in what types of housing, they might live. At the other end of the age scale, older people will not move to live in areas which they consider to be problem areas and yet they need to have accessible services. At both ends of the scale, good public transport is a key enabler that is becoming increasingly rare. - - As regards warehousing and freight, the M58 motorway is a link for freight traffic from Liverpool to the M6 but only for north-bound traffic. (South-

ID	Representor Comments	Council Response
	<p>and east-bound traffic will take the M57 to the A580 or the M62, or to the M56 near Runcorn). The M58 link is already under pressure of congestion at the M6 junction at certain times of the day, so it makes no sense to plan for major growth in freight traffic moving along this route. - - In addition, freight traffic carried by road has been used by the Council to justify building massive warehouses around Skelmersdale. However, such warehouses have not been a huge success, with units being divided in order to find tenants and the pattern now is that massive warehouses will not produce large numbers of jobs, other than for HGV drivers, who are in short supply. Such jobs, in any case, will not form the basis of the higher-paid employment which would underpin the regeneration of Skelmersdale; nor will physical expansion of the town into the surrounding Green Belt. The starting point for long awaited regeneration should be to improve the town as it exists now. - - Looking beyond Skelmersdale, as the Plan should, there is the need to deal with inadequate sewage treatment infrastructure and the flows of surface water, not just out of flood-prone areas but into them as well. The uncertainty of continued pumped drainage from a large part of West Lancashire needs to be dealt with urgently if development in those areas is not to create further problems of flooding. However, it will not be beneficial to re-locate development requirements from those areas to higher-lying areas because the water will simply flow into those flood prone areas. Such re-location of development would also place undue development- and social- pressures on the higher-lying areas, so there is very good reason for reducing the overall target numbers to allow for a moratorium (or at least a severe restriction) on development in flood-prone areas, thereby acknowledging the undesirability, in planning terms, of building within them. - Thus, the responsibility to co-operate with other authorities has to be tempered by the natural restriction on sustainable development within West Lancashire. We note the following caveat, which has great importance, in our opinion: "the Local Plan should fully meet an area's objectively-assessed need for development unless there are overriding adverse impacts of doing so which would outweigh the benefits of doing so". - - One major component of a successful Local Plan is the day to day decision-making in relation to planning applications. This has been woefully inadequate in respect of affordable housing starts and purpose-built homes for the elderly. - - There is a distinct possibility that time spent on producing a new Local Plan now will prove to be abortive. We should let the political and economic situation in the country settle down before making major new plans for the future but, in the meantime, huge effort must be directed towards the improvement of infrastructure within West Lancashire, starting with transport and flooding issues, to enable proper choices to become available at the right time.</p>	
60	<p>6.1 The site which we are promoting as part of this representation is Parris Lane, Aughton. The site is allocated in the adopted Local Plan as a Plan B site (Policy GN2(a)(i)). Therefore it has not been assessed in the SHELAA as the suitability of the site and the principle of development has been accepted. - 6.2 The Council will be well aware of this site as it was the subject of a conjoined Inquiry in May 2016 and two separate appeal decisions in August 2016 and December 2016. The August 2016 decision for Wainhomes was allowed. However that appeal has been challenged by the Council due to a mathematical error in the Inspector's housing land supply calculation. That challenge will be heard in July this year, however the fundamental point for this LPR consultation is that the site was deemed to be a suitable and deliverable location for development. Indeed all site specific matters were agreed through the Statement of Common Ground with the Council with the only issue being the timing of release. - 6.3 The December 2016 appeal decision for Redrow Homes was dismissed solely on the lack of a policy compliant Section 106 agreement being submitted. This decision has been successfully challenged and the appeal will now be redetermined. However importantly for the LPR there are no site specific issues and the site is suitable and deliverable. - 6.4 The reasons for the site</p>	

ID	Representor Comments	Council Response
	<p>to be allocated for immediate release are: - •To meet the short term open market housing need as we maintain the Council cannot demonstrate a 5 year housing land supply; - •To meet the significant affordable housing need. The appeal decisions and the Council's own figures demonstrate the significant need for affordable housing in Ormskirk with Aughton and this is the only site that can meet this need. - •Development of a the scale of development accords with the settlement hierarchy; - •The delivery of open market housing to assist in boosting the supply of housing in West Lancashire; - •A high quality design led scheme with a density of development that accords with the SHMA and the housing needs of the area; - •Development in an accessible location which can accommodate the development scheme socially, economically and environmentally; - •There are no other technical or environmental reasons to withhold planning permission; - •The provision of open space to meet the needs of existing and proposed residents; and, - •A range of social and economic benefits including the provision of New Homes Bonus, CIL, Council Tax revenue now, construction jobs and increase spending for local services and facilities. - 6.5We enclose the masterplan for the sites in the control of Wainhomes and Redrow Homes which was the plan used to determine the planning appeals. All the technical documents which were submitted in support of the planning application and appeal can be found under the following application references: - •Redrow Homes - 2015/0329/OUT; and, - •Wainhomes - 2015/0335/HYB. - 6.6Therefore in light of the housing need and Option 3 being the minimum housing requirement that can be justified, the site should be allocated for immediate release.</p>	
61	<p>The consultation documents are comprehensive, but answering the questions takes some time and may be "off putting" for the public, who are not experts in planning regulations. - I was only made aware of the process because I am on the Council's email list. Consideration should be given to how future processes can be advertised to a wider audience to ensure the views of more members of the public are expressed. - Adequate and proper infrastructure are key to where future development should be situated if it is to be sustainable. The best agricultural land should remain available for future generations to provide food for an increasing population in the country, not just Lancashire. The environment and bio diversity should be protected, again for future generations and the right mix of housing in the most suitable locations will improve the lives of everyone in West Lancashire. Open spaces and leisure activities, especially geared towards a more healthy lifestyle should be provided alongside new development.</p>	
62	<p>We write on behalf of our client The Knowsley Estate, in respect of the West Lancashire Borough Council - Local Plan Review: Issues & Options Consultation. The Knowsley Estate are a major landowner in the - Borough and their estates extend across West Lancashire, Knowsley and St Helens. - - The Consultation includes four Topic Papers: - • Strategic Development Options Paper; - • Economic Policy Options Paper; - • Environmental Policy Options Paper; and, - • Social Policy Options Paper. - - There is also a Spatial Portrait Paper, providing context and background. Our comments to these papers are set out [below]. Comments are largely restricted to the Strategic Development Options Paper, although where - appropriate comments are also provided in respect of the other Papers. - - Firstly, we would like to fully support the Councils decision to undertake a Local Plan review. The National Planning Policy Framework (NPPF) encourages a plan-led system, which keeps policies up-to-date and relevant with local and national context via the preparation of Local Plans. The Council acknowledge that failing to have an up-to-date Local Plan can constrain growth, both economically and in respect of delivering the right type of development in the right places. - - In conclusion it is considered that West Lancashire through the Local Plan Review has an opportunity to plan for and deliver ambitious growth in line with national planning policy.</p>	

ID	Representor Comments	Council Response
	<p>The borough is located in an accessible location within the heart of the North West and should draw on links and opportunities, particularly those arising from the Liverpool and Greater Manchester City Regions. Indeed, there are excellent opportunities, particularly in relation to logistics development. - - However, West Lancashire is highly constrained by the Green Belt and if housing and employment targets are to be delivered it is inevitable that Green Belt release will be required. The Council openly acknowledge that the borough is highly constrained by Green Belt and that existing settlements do not provide sufficient capacity for infill development to meet projected needs. It is therefore considered that the Council should undertake a comprehensive Green Belt review as part of the Local Plan Review. - -</p>	
64	<p>Duty to Cooperate - In accordance with Section 33A of the Planning and Compulsory Purchase Act, the emerging Local Plan must include a Duty to Co-operate Statement of Compliance. The Council has provided a detailed overview of how they intend to demonstrate that the Duty to Co-operate has been met, which our Clients support, particularly in light of the emerging Liverpool City Region SHELMA and the Council's commitment to review prior to the next stage of the Local Plan process. - - It is noted that no reference to the recently published White Paper which is seeking to consult on changes to the NPPF. Authorities will be expected to prepare a Statement of Common Ground which will set out how they intend to work together to meet housing requirements that cross authority boundaries. This should be addressed within the emerging Local Plan. - - Role of Neighbourhood Plans - Consideration should be given to the role of emerging plans and strategies, including any emerging Neighbourhood Plans, which will form part of the Development Plan once adopted. If Neighbourhood Plans are adopted prior to the Local Plan being adopted, it will need to be reviewed to reflect the Local Plan because Neighbourhood Plans must be in conformity with strategic policies in the Local Plan. A review mechanism should be included within any emerging Neighbourhood Plan should this come forward in advance of the emerging Local Plan.</p>	
65	<p>Aughton Parish Council wishes to iterate comments made during the first consultation to Parish Councils, in our letter dated 26 October 2016, ie - 'Given the amount of time spent and the vast cost involved in the production of the West Lancashire Local Plan 2012-2027, adopted just 3 years ago in October 2013, the Parish Council would confirm its support of the rational of the current Development Plan Document and would not support any further release of Green Belt land in this area in the future.' The Parish Council believes the current Local Plan is addressing the needs of Aughton and it does not see a Plan beyond that date is realistic as there will be many changes 'leading up' in the future.</p>	
66	<p>Duty to Cooperate - The Duty to Cooperate (DtC) is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination, the 2013 Mid Sussex Core Strategy Examination and the recent St Albans Local Plan Examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications. - Gladman recognise that the DtC is a process on ongoing engagement and collaboration¹, as set out in the PPG it is clear that the Duty is intended to produce effective policies on cross boundary strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with - its neighbouring authorities, alongside their existing joint work arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of</p>	

ID	Representor Comments	Council Response
	<p>consultation but a question of effective cooperation to ensure that the Housing Market Area’s housing needs are met in full. - - The Council’s ability to fulfil the DtC is fundamentally vital to securing the soundness of the Plan. In order to meet the DtC the Council should effectively engage with neighbouring authorities to meet any unmet housing needs in the HMA and vice versa. The Council should ensure that it is able to demonstrate what steps have been taken at each stage of plan preparation to ensure that the Plan has been subject to ongoing and effective cooperation with any interested parties to which a strategic cross boundary issue, such as unmet housing need, may effect. This will require extensive and ongoing - meaningful cooperation by both officers and members to ensure the Duty is met in full. - - Sustainability Appraisal - In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations). - - The SA/SEA is a systematic process that should be undertaken at each stage of the Plans preparation, assessing the effects of the emerging WLLP proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council’s decision making and scoring should be robust, justified and transparent.</p>	
68	I look forward to seeing the first draft of the Local Plan. - -	
69	See principles at the beginning - have not had time to add detail during latter half of document	
70	<p>DUTY TO COOPERATE STATEMENT - - This paper details the work being undertaken by the Council in respect of cooperation with neighbouring authorities and the wider Liverpool City Region. This is a requirement under the Localism Act 2011 and the NPPF. - - Given West Lancashire’s position in relation to the neighbouring conurbations of Merseyside and Greater Manchester as well the Central Lancashire area, the Duty to Cooperate will be essential to ensure cross boundary issues are fully addressed. - - Currently the Duty to Cooperate Statement highlights the commitments and measures in place to ensure communication between the Council and neighbouring authorities. Table A of the document in particular lists the strategic issues for West Lancashire that will require cooperation with neighbouring authorities. - - Amongst these items is housing delivery where Table A acknowledges that establishing housing requirements in West Lancashire is an ongoing task and that there is communication with authorities within the Liverpool City Region in relation to potential future unmet housing need from other authorities being accommodated in the Borough. - - The Liverpool City Region is seeking to create over 100,000 jobs by 2040. In order to maintain a sufficient balance of jobs and new homes, this is likely to result in a notable number of new homes required; raising the possibility of some authorities having to accommodate its housing needs within neighbouring authorities. - - We look forward to seeing how the Duty to Cooperate Statement progresses and to commenting on it again in due course. - - - SUMMARY AND CONCLUSIONS - These representations have been prepared on behalf of the Church Commissioners for England (“the Commissioners”) and relate to West Lancashire Council’s (“the Council’s”) Local Plan Review Issues and Options papers. At the same time the Council are also seeking comments on the scope of the Local Plan Review and on the draft Strategic Housing and Employment Land Availability Assessment (“SHELAA”). We have therefore also provided comments on these documents. - - Overall the Commissioners support the need for a Local Plan Review and given the</p>	

ID	Representor Comments	Council Response
	<p>issues highlighted within the papers which the Council has produced, there is a clear need to plan positively in the Borough and to maximise growth opportunities which will be coming forward in future years. West Lancashire will also play a key role in any future success of the Liverpool City Region and on this basis, it is likely that the authority may need to accommodate unmet - housing need from adjacent authorities. This translates to setting an aspirational housing target which will also assist in balancing new jobs and homes and alleviate the Borough's affordability issues. - - This will mean that it will be necessary to consider Green Belt land for release and whilst the Council undertook a Green Belt Study in 2011 (with a 2012 addendum), this does not appear comprehensive in nature and the parcels of Commissioners' land that were assessed were not done so in a correct and robust manner. We therefore believe a revised Green Belt Study is - required to feed into the Local Plan Review. - - The Local Plan will also cover development management policies and criteria relating to areas such as affordable housing. The Commissioners' view on this is that such policies need to be as flexible as possible so that they endure the plan period and do not frustrate housing building and growth. - - Whilst the overall proposed scope of the Local Plan appears to be largely sufficient, we do believe a greater emphasis on the Duty to Cooperate is needed and the Council should do more to explore potential options to create sustainable additions to settlements in Sefton in line with the longer plan period identified in this Issues and Options draft (which would go beyond the current plan period in the adopted Sefton Local Plan). Future drafts of the Local - Plan Review should also seek to explicitly link policies to the evidence base and seek to explain how they are to address the issues which the Borough faces. - - The draft SHELAA does contain all of the Commissioners' land that has been put forward through the Call for Site process (both from Barton Willmore and Savills), however the vast majority of these have not been thoroughly considered as they have been 'parked' because they lie in the Green Belt. As a review of the Green Belt is required, these sites will need to be reconsidered at a later date. We have questioned some of the assumptions made in relation - to the Commissioners' sites promoted by Barton Willmore and these are highlighted in Section 9 above. Overall, we believe the Commissioners' sites are suitable and available and are capable of coming forward for future residential development. - - We trust that these representations will be of assistance to the Council and we reserve the right to make further comments on the Local Plan Review and its evidence base as they move forward through the plan preparation process.</p>	
72	<p>I have been to both the agents and residents consultation meetings and congratulate your staff on the professional and courteous manner they have dealt with both industry experts and general public. Well done, kind regards, Phil</p>	
73	<p>These representations are made on behalf of Edge Hill University ("the University") to West Lancashire Borough Council (WLBC) in respect of the West Lancashire Local Plan Review – Issues and Options consultation and supporting documents. - Edge Hill University is located in Ormskirk and currently has over 13,000 students. The University is one of the most significant employers in the Borough and contributes towards the local and regional economy. - The University supports the Council's approach to undertaking an early review of the West Lancashire Local Plan 2012-2027 (WLLP). Whilst it is accepted that the WLLP is just over three years old, there have been significant changes in national planning policy and the development context since its adoption. In particular, the Conservative Government has made clear its expectation that Local Planning Authorities (LPAs) have an up-to-date Local Plan in place and keep them under review to ensure that identified development needs are met. - - As WLBC has acknowledged, failing to have an up-to-date Local Plan in place can constrain growth; both economically and in terms of providing the right</p>	

kind of development in the right place in a timely fashion. - - Edge Hill University is a campus-based university located in Ormskirk, adjacent to St Helens Road. Originally opened in 1885 as Edge Hill College, the institution moved to the Ormskirk campus in the 1930s and was granted Taught Degree Awarding Powers and became Edge Hill University in May 2006. - - The University has three Faculties: - (a) Faculty of Arts and Sciences comprising Departments of Biology, Business - (Edge Hill Business School), Computer Science, English, History and Creative - Writing, Geography, Law and Criminology, Media, Performing Arts, Psychology, - Social Sciences and Sport and Physical Activity. - (b) Faculty of Education delivers initial teacher training programmes for the age - phases of education, together with Continuing Professional Development for the school workforce. - (c) Faculty of Health & Social Care delivers pre-registration training for nurses, - midwives, operating department practitioners and paramedics; qualifying social - work degrees; and professional development in the fields of health and social - care. - - The University headcount as of 2015/16 comprises 13,564 students (comprising 10,913 studying full-time undergraduate and postgraduate courses and 2,651 studying parttime). - - The University is major asset to West Lancashire. It makes a significant contribution to - the local economy; estimated, in 2011 to be in the region of £75 million Gross Value - Added (GVA) per annum² although it is worth noting that the University has grown a - further 20% since 2011 and its overall GVA contribution is now likely to be over £90 - million. It is also one of the most significant employers in West Lancashire, employing 1,519 members of staff in 2015/16; the vast majority being full-time. It also provides a wide range of high class facilities, such as the Arts Centre and Sports Centre, which are well used by the community. - - The University has made significant investment over recent years in programme - development in the fields of arts, media and sciences to further diversify overall - academic choice and improve the academic facilities on offer (for example the new Creative Edge and more recently the Tech Hub). The University has benefitted from this investment and is witnessing, for example, a 19.3% application growth (2016/17) in the arts and sciences. - - Furthermore, the University has been experiencing a material improvement in the calibre of student choosing to study at Ormskirk. Over the last three years, the average tariff point score for 1st degree entrants at the University has increased from 308 points in 2012/13 to 325 points in 2014/15 while the number of 1st degree students studying at the University with 350 or more tariff points has risen from 846 to 1,117 over the same timeframe. - - The latest Times Higher Education (THE) UK Student Experience Survey indicated that Edge Hill University offers the best student experience in the North West. At the national level, Edge Hill University is ranked as joint second place nationally for its good environment on campus and holds joint third place nationally for having high quality facilities. - - Edge Hill University was awarded 2014/15 University of the Year in the 10th annual Times Higher Education (THE) Awards. The award is the most prestigious accolade in the Higher Education sector and the University was chosen as the winner from a list of six shortlisted institutions, which also included Glasgow and Swansea Universities. - - The University of the Year award highlighted the continuing success of the University and opened the doors to increased partnerships and collaborations locally and nationally. Working with Tate Liverpool, the Everyman Theatre and Liverpool Sound City, as well as continuing to develop opportunities in the music industry through The Label recordings, has increased the employability of Edge Hill students further. - - There has also been a surge of interest around Edge Hill, with record numbers of visitors at open days and increased interest from external organisations. - - Edge Hill University boasts a vibrant campus community located in 160 acres of land in Ormskirk. Lakes, green spaces and even a beach can be found alongside awardwinning building developments which reflect almost 130 years of history and innovation. - - The University's commitment to sustainability has been recognised with a string of green - awards and as part of this vision all new buildings on campus incorporate low carbon - technologies and energy efficient lighting,

ID	Representor Comments	Council Response
	<p>heating and glazing. For the second year running, the University has been given Green Flag status – the national benchmark for parks and green spaces in the UK – for maintaining an attractive, safe and welcoming campus. - - Edge Hill University has also been judged as the safest campus in the North West for the third year running by the Complete University Guide. - - Over the past 15 years, over £200 million has been invested in developing and - extending the campus. Redevelopment has principally been guided by the University’s Estates Strategy and Development Framework which has set out a pipeline of capital projects and redevelopment opportunities. The new buildings and spaces help to fulfil the University’s vision of a visually inspiring, sustainable environment and provide a high class student experience. - - There are a diminishing number of redevelopment opportunities available within the existing campus. These are principally located within the Central Campus and include the ‘back halls’, the Students’ Union, the Learning Innovation Centre (LINC), Library and Student Information Centre (SIC) buildings. - - These areas have been identified by the University as immediate – medium term opportunities following the completion of the new Library and Resource Centre and student townhouses. - - It is currently anticipated that the identified redevelopment opportunities within the existing campus provide around four to five years’ worth of capital development projects. - - The University is now a well-known and well-established institution and there is an emerging desire to expand from the University’s ‘vocational-led learning’ approach towards a more ‘mainstream’ research-led university. All three faculties are intending to extend and diversify their programme offer, which will include expansion in the number of postgraduate and Masters programmes on offer, as well as a notable growth in research. - - It will be important for the University to capitalise on the anticipated growth within its faculties. The Faculty of Arts & Sciences, for example, has ambitious plans for growth by developing new programmes relating to food technology, design and engineering. - This will undoubtedly require the provision of further academic and teaching space. - - Increasing the ‘internationalism’ of the University will also be an important area of focus over the longer term. This is likely to go ‘hand in hand’ with the development of new programmes within the Faculty of Arts & Sciences, and will result in requirements for specific facilities, including additional languages support and short-term accommodation options for students. - - Encouraging innovation and the development of further links with businesses and the local community is also high on the University’s agenda. This is likely to bring unique requirements for facilities, including further hatchery / incubator space and the potential for a science / innovation / business park and conferencing space. - - It is evident that there is some scope for growth to be accommodated within the existing campus. However, that scope is finite and it will be important to balance the University’s desire for growth without compromising the environmental quality of the existing campus, including its green spaces between buildings, high quality landscaping and ‘open feel’ which is one of the main reasons that the University is so popular to both staff and students. - - This indicates that there is likely to be a requirement for the University to consider further land acquisition in the medium to long term if its growth aspirations are to be met without compromising the quality of the existing campus.</p>	
76	<p>I write on behalf of my clients, T&T Williams and Morris Homes Northern Ltd, in respect of the land off Pingwood Lane, Simonswood (the Site) in response to the Council’s current Local Plan Review Issues and Options Consultation. The purpose of this letter is to promote the Site, whilst also setting out a response to the options outlined in the Strategic Development Options Paper (February 2017) and the associated topic papers and evidence base. - - In order for the Council to meet the development needs of its residents and continue sustaining its economic growth, higher growth scenarios will need to be embraced going into the Local Plan Review. Consideration of existing employment sites could provide a vital land</p>	

ID	Representor Comments	Council Response
	<p>supply, certainly in respect of the Site which has capacity to be reconfigured to provide both much needed housing and boost local employment. Further technical details of the Site and its development capacity will be explored for the next stage of the Local Plan Review consultation. - I trust that these comments will be taken into account as the Council continues to review the West Lancashire Local Plan. Should you require any clarification on any points made in this letter in the meantime please do not hesitate to contact me on the details below, in the meantime please confirm receipt of this representation.</p>	
78	<p>I wish to comment on access to information for each planning information have not found it easy to access Skelmersdale office not sure had to print off eventually. Skelmersdale library just the report forms no information we have used the information learned at workshop meetings and the leaflet through the door. Please could a display be used in the relevant facilities. We have not all got internet. Thanking you.</p>	
79	<p>HOW Planning LLP (“HOW”) has been instructed by Story Homes to prepare and submit representations to the West Lancashire Local Plan Review Issues and Options Consultation, prepared by West Lancashire Council (“the Council”). These representations primarily address the questions posed within the Strategic Development Options Paper but also consider the Social Policy Options Paper. - The Strategic Development Options Paper identifies a series of issues and options for the amount and broad location of new housing and employment development. The preferred option will then be the basis of the Local Plan Review, guiding development for the next Plan period. - The Social Policy Options Paper considers the social aspects of sustainability. - The following representations set out Story Homes’ observations on the Papers, with particular reference to the “soundness” of the Issues and Options as detailed in paragraph 182 of the National Planning Policy Framework (“the Framework”). - The Council will be aware that our client is the promoter of land at Yew Tree Farm (“the Site”) as part of the Yew Tree Farm allocation in Burscough. A Site Submission document is attached at Appendix 1. - Our client is keen to work with the Council going forward to assist with the preparation of the Local Plan and would welcome discussions about the proposals for the Site. - - Story Homes is a privately owned housebuilder. Founded by Fred Story in 1987, it has a long and successful reputation of building quality and high specification homes across the North West. The family owned business has grown in size and status over the years but remains grounded, built on its original ethos of ‘doing the right thing’ and creating a brand synonymous - with quality. In 2016 Story Homes built around 800 new homes across the North of England. - For nearly 30 years Story Homes has been the name most often associated with aspirational houses for sale throughout Cumbria, the North East and Lancashire, and it is rapidly expanded across the whole of the North of England. A passion for quality and excellence has seen Story - Homes become a multi award winning UK property developer; with modern and attractive homes instantly inspiring buyers. Story Homes have also recently been awarded a top ‘5 Star’ rating in the house building industry’s annual customer satisfaction survey for the fourth year running since being included in the survey. - Story Homes’ success is underpinned by a determination to understand the needs of communities where they build and a goal to deliver design quality and high quality building specifications that enhance locations. - - The National Planning Policy Framework (NPPF) provides the overarching policy context for the preparation of the emerging Local Plan. It is a material consideration for the plan-making process. In this regard, insofar as its policies are relevant to this representation, we highlight that the NPPF requires local planning authorities (LPA) to: - ☐ “...boost significantly the supply of housing...” (paragraph 47); - ☐ “...ensure that their Local plan meets the full objectively assessed needs for market and affordable housing...” (paragraph 47); - ☐ “...identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand...”</p>	

ID	Representor Comments	Council Response
	<p>(paragraph 50); - Ensure that their Local Plan incorporates “...sufficient flexibility to adapt to rapid change...” (paragraph 14); - “...plan positively to support local development, shaping and directing development in their area...” (paragraph 16). Indeed, the need for a Local Plan to be “positively prepared” - is one of the four tests of soundness; - Ensure “...that the planning system does everything it can to support sustainable economic growth...” (paragraph 19); - Ensure that Local Plans are “...aspirational but realistic...” (paragraph 154); - Ensure that their Local Plan not only meets needs but also responds “...positively to wider opportunities for growth...” (paragraph 17); and - Conserve and enhance the natural environment (paragraph 109). - - In addition to the above, the NPPF highlights the importance of protecting Green Belt land from inappropriate development. However, it confirms that Green Belt boundaries can be altered in “...exceptional circumstances...” (paragraph 83) via the plan-making process. Such circumstances include an inability to meet development needs, as is currently the case in West - Lancashire. When doing so, LPAs should, inter alia: - Identify areas of ‘safeguarded land’ between the urban area and the Green Belt which are capable of meeting longer-term development needs; - Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period; and - Define new Green Belt boundaries clearly using physical features that are readily recognisable and likely to be permanent. - - We refer to other policies of the NPPF, as well as the Planning Practice Guidance (PPG), elsewhere in this Report. - - The Government has also recently released the White Paper ‘Fixing our broken housing market’ which is also considered in this Report with particular reference to Safeguarded Land and the release of Green Belt land.</p>	
80	I have only commented on housing need - specialised housing is a small but important consideration	
82	Home owners should be discouraged from paving over their gardens for parking. Grass lawns make excellent sponges for heavy rain and the increase in paved over gardens is adding to flash flooding. Charging for the removal of green waste is penalising the people who are acting in the interest of the environment and encouraging people to pave over their green spaces.	
84	Persimmon Homes is pleased to see that a Duty to Cooperate Statement has been produced from the outset. It is assumed that this will be updated throughout the process if necessary. This is in particular relation to the evidence base work of the Liverpool City Region which is currently on - going. This is of particular relevance in relation to the Strategic Housing and employment Land Market Assessment (SHELMA) which is not currently out for consultation. This document in particular could have significant impacts for the West Lancashire Local Plan review and the preferred option at the next stage. - Care should be taken not to neglect the duty to cooperate with those neighbouring authorities who do not form part of the Liverpool City Region.	
87	Burscough Parish Council is particularly concerned about the way in which information gathered, giving equal weight to a developers comments as to a residents’ comment, when each may have very different skills, budgets and motivations: Those seeking to gain personally/organisationally from the local plan should be assessed separately to those with a longer term interest in our community. - - Burscough Parish Council is also concerned about the interpretation of the NPPF and principles such as “Sustainable Development”	
89	WLBC are currently reviewing the Local Plan (2012-2027). A review of the Plan will assist the Council in meeting the needs of any future opportunities which may arise from existing and planned developments such as the ‘Liverpool 2’ scheme. - - An assessment of the housing and economic growth needs across the Liverpool area, known as Strategic Housing and	

ID	Representor Comments	Council Response
	<p>Employment Land Market Assessment (SHELMA) has been undertaken as well as a Strategic Housing Employment Land Availability Assessment (SHELAA). These will form key evidence base documents for the review of the Local Plan. - - The WLBC Local Plan is currently under review. - WLBC are currently reviewing the Local plan to assist the Council in meeting the needs of any future opportunities which may arise such as the 'Liverpool 2' scheme. To assess the housing and economic growth needs across the Liverpool area a SHELMAA has been undertaken as well as a SHELAA. - We are instructed by S Rostron Limited in respect of its land interests land at Land at Red Cat Lane, Burscough. - Land at Red Cat Lane, Burscough represents a deliverable development site in a sustainable location. This site would assist the Council in delivering much needed employment land immediately. - We have assessed the Options Papers having regard to soundness tests set out in Section 182 of Framework and conclude that the subject site should be released for development.</p>	
91	<p>Duty to Cooperate - As you know St. Helens Council has recently consulted on a Local Plan Preferred Options (2016) which proposes to allocate 306.09 ha of land for employment use up to 2038, with an additional 52.82 ha of land safeguarded for employment use beyond 2033. This is reflective of the Council's strong economic growth ambitions, with the transport and logistics sector considered to be a key competitive strength for St Helens compared to its neighbours and the most important opportunity for jobs growth in the Borough over the next 20 years. - As the West Lancashire Local Plan Review evolves and as the new St. Helens Local Plan progresses, the Council looks forward to continuing to engage with West Lancashire Council in relation to how we can help each other meet unmet objectively assessed development needs, if considered necessary, - and where reasonable to do so and consistent with achieving sustainable development. - As the West Lancashire Local Plan Review progresses and a preferred spatial distribution strategy and development sites are identified, the Council would like to continue to work with West Lancashire Council to ensure any adverse cross-boundary impacts (if there are any) on residents of St. Helens, - particularly in relation to highways and education infrastructure are minimised. - - The Council looks forward to continuing to engage with West Lancashire Council as the West Lancashire Local Plan Review evolves.</p>	
93	<p>I attach two documents for consideration. - The paper on rural communities perhaps relates best to the Strategic Development Options. The paper on Alt-Crossens cuts across a number of policy areas. -</p>	
94	<p>On behalf of our client, Crompton Property Developments Limited [CPDL], Lichfields is pleased to submit representations to the West Lancashire Local Plan Review Consultation – Issues and Options. These representations are made in the context of CPDL's interest in the Yew Tree Farm site in Burscough. - - Policy SP1 of the existing West Lancashire Local Plan (2012 – 2027) identifies a borough wide need for a minimum of 4,860 new dwellings and 75 ha of land for employment uses over the plan period. These targets have been divided into spatial areas within the Borough. The overall target for Burscough is to deliver 850 dwellings and 13 ha of employment development over the plan period. Achieving these targets is essential to enable the Council to meet its vision of offering residents of West Lancashire better access to services, facilities and the housing market and diversifying the employment base. - - In order to meet these targets, Policy SP1 of the Local Plan identifies “Yew Tree Farm, Liverpool Road South, Burscough” to provide residential and employment development and new community infrastructure. Policy SP3 provides further guidance on the Yew Tree Farm Strategic Development Site which states that it should deliver at least 500 new dwellings and 10 ha of new employment land. Post 2027, safeguarded land should provide up to 500 more dwellings and up to 10ha of employment land. The site now benefits from outline permission for 580 houses and 4.6 hectares of employment development (ref. 2015/0171/OUT). - - The Council has commenced a review of the existing</p>	

ID	Representor Comments	Council Response
	<p>West Lancashire Local Plan (2012 – 2027). The Issues and Options Local Plan Review – Strategic Development Options Papers (February 2017) sets out a series of options for the amount and broad location of new housing development in the borough. The Issues and Options considers two time periods for the new Local Plan, both of which have a base date of 2012 (to match the base date of the SHELMA and the current Local Plan). The Council highlights that a portion of the housing and employment land requirements identified in the new Local Plan will have already been met by development that has already been delivered, is being delivered, has planning permission or that is allocated under the existing Local Plan. It is therefore imperative that the strategic allocations identified in the existing Local Plan come forward for development. Our client fully supports the current allocation of the Yew Tree Farm site and the future development of the wider safeguarded site. CPDL also welcome the Council’s ongoing support to this allocation. - - With regards to the division of the uses within the Yew Tree Farm site, it is considered that the area which abuts the rear gardens of the dwellings on Lordsgate Lane and Liverpool Road South would be more suited to residential development than employment generating uses. It is considered that residential development would be more compatible with the adjoining uses by reason of amenity, principally noise and traffic generation. The emerging Local Plan should have regard to this. -</p>	
95	<p>1.1 This report is prepared by Turley on behalf of our client David Wilson Homes North West (hereafter referred to as “DWH” or “our client”). It provides representations to West Lancashire Borough Council (WLBC) in respect of the Local Plan Review: Issues & Options Consultation, which is currently the subject of public consultation. - 1.2 The Issues and Options stage comprises a series of papers which cover a wide range of policy themes and key planning topics. The topic papers are as follows: - • A Spatial Portrait paper which identifies the key issues which face the Borough and which need to be addressed in any LP review - • A paper on Strategic Development which sets out potential options for the amount and broad location of new housing and employment development - • Three topic papers which explore the policy options in dealing with the key issues identified in the Spatial Portrait paper: - – Economic Policy Options - – Social Policy Options - – Environmental Policy Options - • A topic paper covering the legal Duty to Co-operate. - 1.3 Alongside the suite of topic papers, WLBC has published a range of emerging evidence base documents, including spatial and thematic papers regarding particular settlements and also more detailed evidence documents including a new Housing and Economic Development Needs Assessment (HEDNA) to inform housing matters. This collection of evidence has been referred to in these representations where appropriate. - - Context - 1.4 DWH is part of Barratt Developments PLC, the UK’s largest house builder, and has a track record of working with local communities to deliver high quality developments which benefit the local communities in which they are provided. In 2016 DWH delivered 551 new homes in the North West, meeting local and general housing needs and providing new jobs and investment throughout the region. - 1.5 The emerging Local Plan Review for West Lancashire identifies a pressing need for increasing housing delivery, in the context of a longstanding and growing undersupply of new homes. This need is particularly acute in areas of high demand such as Ormskirk with Aughton, which has been poorly provided for in terms of new housing supply in recent years despite its size, sustainability and status as one of the Borough’s Key Service Centres. In this context, WLBC will be aware that DWH has an interest in land at Parris Lane at the eastern edge of Aughton, hereafter referred to as “Parris Lane” or “the Site”. The Site is identified and described in this report and within the accompanying Vision Document. - 1.6 The potential opportunity at Parris Lane is at an early stage and the development which it could provide is not ‘fixed’. It could accommodate a range of uses cognisant of the needs and aspirations of the area and the benefits which new development might be able to provide. It could make</p>	

an important contribution to meeting the needs of Ormskirk with Aughton. It could also offer benefits to the area, such as through affordable and/or elderly homes, educational facilities, local shops and services, opportunities for leisure and recreation, and/or new highways infrastructure. DWH is keen to work collaboratively with WLBC, the local community and other stakeholders to explore, expand and refine the potential development opportunity over the coming weeks and months. - Summary of Representations - 1.7 DWH's representations to the Issues & Options consultation is comprised of the following three documents: - • Written representation to the Issues & Options topic papers (this report) - • West Lancashire Housing Need – Evidence Based Critique - • Vision Document: Land at Parris Lane, Aughton - 1.8 The representations are summarised as follows: - (a) DWH supports the continued identification of Ormskirk with Aughton as a settlement in future LP planning. - (b) The absence of the LCR SHELMA work makes it difficult to assess in detail the conclusions of the HEDNA report and the justification underpinning certain Development Options which propose a higher level of housing. - We reserve the right to comment further upon the full publication of the SHELMA as we believe this work will have a significant impact upon future development planning in West Lancashire. - (c) Notwithstanding (b) we have undertaken a critique of the HEDNA and consider - (d) It is our view that any housing requirement will need to be aligned with WLBC's economic ambition and its intention to play a greater economic role within the LCR. As such, it is likely that a housing requirement in excess of 300 per annum will likely be required to meet this economic ambition if WLBC wishes to capitalise on the growth emanating from the growth in logistics and Liverpool 2. - (e) There is a pressing need for increasing housing delivery, in the context of a longstanding and growing undersupply of new homes in the borough. This need is particularly acute in areas of high demand such as Ormskirk with Aughton, which has been poorly provided for in terms of new housing supply in recent years despite its size, sustainability and status as one of the Borough's Key Service Centre. In contrast the development strategy of the current Local Plan has sought to deliver more homes in areas of lesser market demand such as Skelmersdale and Burscough. Our evidence suggests that housing delivery in these areas is failing and reflective of weak demand in those settlements. - (f) The current development strategy cannot be continued and it is our strong contention that Ormskirk with Aughton should accommodate a greater proportion of development that has been previously received through the current Local Plan. The Council's own evidence clearly points towards the opportunity for and demand for new homes in Ormskirk with Aughton. The settlement is under-provided with the current housing requirement in the Local Plan failing far short of its role, scale and function within the settlement hierarchy. DWH consider that Ormskirk with Aughton should accommodate at least 25% of the development needs established in the Local Plan Review; this is considered to be more commensurate to the size, scale and function of the settlement and its population and the market signals that are articulated in our evidence. - (g) It is our view that the Council should consider a hybrid approach in Local Plan duration. While the Council's intention to consider a longer term timeframe it is fraught with difficulty in providing the necessary evidence, robustness and certainty to plan effectively. A hybrid approach would enable any Local Plan to plan for development needs for the next 20 year while identifying potential sources of supply through safeguarding (and thereby ensuring Green Belt boundaries are robust and endure until at least 2050). The Local Plan will also need to build in sufficient flexibility to guide against housing non-delivery. The Local Plan should therefore include the appropriate mechanisms for regular review and provide sufficient flexibility – potentially through the provision of reserve sites to come forward when necessary through the plan period. - - Structure of the Representations - 1.9 This document provides a response to each of the Topic Papers set out within the Issues and Options consultation. It is structured as follows: - • Chapter 2 sets our comments in respect of the Spatial Portrait TP - • Chapter 3 sets out our comments in respect of Spatial

Development TP - • Chapter 4 sets out comments in respect of the key issues TP in terms of Economy, Environmental and Sustainability. - • Chapter 5 sets summarises our emerging thoughts in respect of land at Parrs Lane, Aughton with reference to a Vision Document which has been prepared to visually articulate these initial ideas and accompanies these representations. - - - 5. The Opportunity at Parrs Lane - - 5.1 Chapter XX of this Report sets out DWH's strong view that there are demonstrable exceptional circumstances to justify the release of land from the Green Belt in Ormskirk with Aughton, mindful of: - • The significance and profile of the settlement in the hierarchy and its role in securing a sustainable pattern of development which can underpin the economic growth of the Borough; and - • The need to address issues of housing availability and affordability in the settlement, and provide a viable long-term future for its services and facilities. - 5.2 WLBC will be aware that DWH is the promoter of land at Parrs Lane, Aughton for Green Belt release and allocation for a residential-led development. The Site, which is approximately 25.3ha in size, is identified in Figure XX below. - 5.3 A Vision Document is has been prepared which provides an appraisal of the Site and what can be achieved by its development. It is submitted and should be read alongside this Report, and the paragraphs below provide an overview. The opportunity is at an early stage and DWH is keen to work with both WLBC and other local stakeholders, including Aughton Parish Council in particular, to shape the proposal and ensure that it can maximise the benefits for the area. - 26 - The Site - 5.4 As set out in the Vision Document, the Site is: - • A sustainable location for growth. It is well located within walking distance of a range of shops, services and facilities, including schools and health services. The site is also demonstrably accessible, given its location within walking distance of two rail stations at Town Green and Aughton Park. It is therefore a demonstrably sustainable location for a residential-led development and is ideally placed to encourage trips by walking, cycling, bus and rail. This is particularly important given current traffic constraints in Ormskirk. No other development sites are better located in relation to sustainable transport routes. - • It will not result in significant harm to the Green Belt. The Site does not perform a strategic Green Belt function or make a significant contribution to the five Green Belt purposes. Its release will therefore result in relatively limited harm and will not undermine the general extent of the West Lancashire Green Belt. - 5.5 In respect of the latter point, WLBC's Green Belt Study (2011) identifies that the eastern boundary of the site is somewhat undefined. However, this issue is experienced by all prospective Green Belt releases around the settlement. DWH has put in place proposals for tree planting along this boundary, which will ensure that it is clearly identifiable and can form a permanent and defensible Green Belt boundary. It will also help to visually screen the development, minimising its impact upon the openness of the wider Green Belt. - 5.6 The Site is currently comprised of greenfield land. There are no known contamination issues with the land, albeit the necessary assessments in this respect can be undertaking in due course. The Site is entirely located within Flood Zone 1 as defined on the Environment Agency's Flood Risk Map18, such that the risk of tidal or fluvial flooding is defined as 'low'. It is not located within or in the setting of a Conservation Area. - 5.7 It is therefore clear that Parrs Lane is demonstrably suitable for development. This is confirmed by WLBC's draft SHELAA (reference OA.124), which notes that the Site is not subject to any physical constraints or contamination uses, and is not located adjacent to any "un-neighbourly uses". DWH also confirms that the Site is: - • Available for residential development. DWH have an active legal interest over all the land. There are no legal or ownership constraints such as ransom strips or tenancies which would present an obstacle to the early delivery of new homes; and - • Achievable for development. It is located in one of the most popular and desirable places to live in West Lancashire and the area has an urgent need for new housing. The Site is therefore viable and DWH are committed to deliver new market and affordable housing at the earliest opportunity. - 5.8 It is therefore considered that the Site presents deliverable residential

ID	Representor Comments	Council Response
	<p>development opportunities and can contribute towards the Borough's housing land supply within the next five years, subject to the release of land from the Green Belt. - The development opportunity - 5.9 The accompanying Vision Document sets out that a robust development and landscape framework can be achieved in order that the Site can be structured to form a well-connected, accessible and attractive development which responds to its existing landscape assets, whilst creating a softer and defensible settlement edge. - 5.10 DWH is keen to work with the local community and other stakeholders in respect of the scale and type of development which could be proposed, cognisant of the needs and aspirations of the village and the benefits which new development might be able to deliver. Initial thoughts are that it could provide: - • Family homes – new high quality and attractive family homes, with a mix of different sizes, types and tenures, would respond to the needs of Ormskirk with Aughton and bring new working age families to the town. This would help to underpin economic prosperity and support the vitality and viability of local services and facilities. - • Affordable homes – affordable homes of different types and tenures would help to address the severe affordability issues in the local area. Such homes could be made available to existing residents in the existing community in the first instance. - • Elderly accommodation – mindful of the ageing of the population in the settlement, new homes for older residents are increasingly in high demand. Such homes could include 'downsizer' dwellings, freeing up much needed family homes elsewhere in the settlement, or bespoke retirement accommodation by a specialist provider. - • A new local centre – new shops, services and facilities could meet an increasing demand in this part of Aughton, supporting the sustainability of the local area and encouraging local residents to make journeys on foot rather than by private car. - • Expanded school facilities – mindful that the adjacent Town Green Primary School is at capacity, additional teaching space over the road within the site could enhance the quality of the school's facilities. Safe links and access arrangements could be put in place, with the existing Prescott Road downgraded as a result of its diversion through the site. - • A Country Park or other open space – new high quality landscape greenspace, such as a Country Park, could provide much-needed opportunities for local residents to enjoy the outdoors and for children to learn about the natural environment. - • New highways infrastructure – Prescott Road could be diverted through the site to improve traffic flow, enhance amenity for existing residents, and enable safe access routes for pedestrians. - 5.11 DWH looks forward to working with Aughton Parish Council and WLBC to explore, expand and refine the potential development opportunity over the coming weeks and months. The following development framework options illustrate how a different scale and mix of uses could be provided within the development and landscape framework.</p>	
96	<p>This is a written response with reference to the formal consultation to the Issues and Options stage of the Local - Plan Review, ending 28th April 2017. - These representations are made by ATP as Agent on behalf of our client Anglo International Up Holland Limited - ("AIUH") who have a substantive land interest in Up Holland comprised of the former St Joseph's Seminary and - surrounding land. AIUH have held the land since 2000 and have the benefit of an extant consent for 297 dwellings - involving new build and partial retention of the existing Seminary which is now vacant. - This land forms part of the larger UP.012 parcel, and all of the UP.029 land as identified in the Council's SHELAA - papers. - AIUH has been seeking to engage with the Council (directly and by agreement through others such as SCPI) to - work collaboratively to deliver a scheme that provides the opportunity to bring heritage assets back into active - use and contribute to other planning objectives. There has been an extended planning history for the subject land - since the site was acquired by AIUH in 2000 which the Council will be well aware of. - AIUH forms part of the Derwent Group of companies, and the Council may be aware that since the passing of its -</p>	

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	<p>founder (Albert Gubay) in January 2016 the Derwent Group is now 100% owned by a charitable foundation and - that all of its business is carried out solely for the benefit of charitable causes. This is set out to clarify that the - owners of the subject site have set out a very clear intent to support this philanthropic legacy and embrace - collaborative and transparent work practices which reflect that approach. - The Seminary and many of the buildings in its curtilage lie beyond the currently identified Development Limit, - and these buildings are statutorily listed in their own right. - We answer the 36 questions set in the online survey, with particular reference paid to the position of AIUH and - their interests in Up Holland. - - - - Conclusions - The St Joseph's site is immediately adjacent to the northern settlement boundary and includes substantial built - form and extant consents to deliver 297 new residential units (205 new build and 92 through refurbishment). That - consent (or a future consent) provides an opportunity to bring vacant heritage assets back into active use, and - valuable contributions to housing supply, fulfilling unmet affordable housing requirements and deliver specialist - accommodation for older people. - We conclude that an amended scheme focusing more on land to the south of St Joseph's Seminary and to the - northern boundary of Up Holland represents that positive way forward as it would also minimize impacts upon - the openness of the Green Belt and reduce potential effects upon the setting of the heritage assets. - - We trust that these representations are clear and helpful. We would be delighted to provide further information - in these respects as may be appropriate and helpful.</p>	
97	<p>This is a written response with reference to the formal consultation to the Issues and Options stage of the Local Plan Review, ending 28th April. These representations are made by ATP as Agent on behalf of St. Modwen - Developments Limited ("St. Modwen") who have substantive land interest in Skelmersdale Town Centre. - We answer the 36 questions set in the online survey, with particular reference paid to the position of St. Modwen and their interests in Skelmersdale. - - The St. Modwen site lies at the heart of Skelmersdale town centre and is crucial to both the regeneration of the - town centre but also the town as a whole. With all necessary land assembled, stakeholder agreements and planning approvals it represents the right scheme in the right location. The Council should identify the site within a PSA for Skelmersdale. If there is an ambition to deliver a retail warehouse park in West Lancashire, the first consideration should be to locate that within Skelmersdale town centre supporting the existing centre rather than seek an out-of-centre site which has the potential to undermine existing or planned investment.</p>	
98	<p>GL Hearn has been instructed by McDermott Homes to submit representations to the West Lancashire Local Plan Review Issues and Options/ Strategic Housing Land Availability Assessment Consultation in respect of its landholding at Town Green, Aughton, as shown edged red on the enclosed Site Location Plan. - These representations seek to respond to relevant questions posed in the Strategic Development Options Paper, dated February 2017, and should be read in conjunction with the 'call for sites' submission issued to the Council by McDermott Homes in September 2016, including the enclosed the Vision Statement. Since the original proposals were submitted to the Council an additional area of land has now been secured for promotion through the Local Plan process as detailed below. - The Site - The Site in its entirety extends to approximately 44 hectares in area and is situated in a predominately residential area on the southern edge of Aughton, a Key Service Centre as defined in the West Lancashire Local Plan 2001-2027. It is well contained with clearly defined physical boundaries to the north, east and west. The site comprises flat agricultural land bisected by a footpath (ref. 8-4 FP14) and mature trees to the west and is accessible from Middlewood Road to the north; Middlewood Drive to the north east; Bleasdale Close and Sefton Gardens to the east, and Prescott Road to the south. - The Site is currently designated</p>	

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	<p>as Green Belt however, does not contain any statutory or non-statutory nature conservation or heritage designations and is classified as flood zone 1 (low probability) on the Environment Agency (EA) flood map. It is understood that the site is not classified as best and most versatile agricultural land. - Overall, subject to removal of policy constraints there are no technical considerations which would preclude residential development on site. - - Site Allocations - McDermott Homes respectfully requests that the Council takes into consideration the proposed site, in its entirety, for Green Belt release and allocation for housing in the emerging Local Plan Review. The site is sustainably located on the edge of Aughton and is available for development; is suitable for development and is developable with some development capable of coming forward within 5 years following allocation. - - Conclusion - McDermott Homes are keen to work collaboratively with West Lancashire Borough Council to deliver a 'sound' Local Plan Review which meets identified development needs in the Borough. We would welcome the opportunity to engage with the Council to discuss development options and opportunities at the site in greater detail.</p>	
99	<p>Other Comments – Duty to Cooperate - In accordance with Section 33A of the Planning and Compulsory Purchase Act, the emerging Local Plan must include a Duty to Co-operate Statement of Compliance. The Council has provided a detailed overview of how they intend to demonstrate that the Duty to Co-operate has been met, which our Clients support, particularly in light of the emerging Liverpool City Region SHELMA and the Council's commitment to review prior to the next stage of the Local Plan process. It is noted that no reference to the recently published White Paper which is seeking to consult on changes to the NPPF. Authorities will be expected to prepare a Statement of Common Ground which will set out how they intend to work together to meet housing requirements that cross authority boundaries. This should be addressed within the emerging Local Plan. Role of Neighbourhood Plans Consideration should be given to the role of emerging plans and strategies, including any emerging Neighbourhood Plans, which will form part of the Development Plan once adopted. If Neighbourhood Plans are adopted prior to the Local Plan being adopted, it will need to be reviewed to reflect the Local Plan because Neighbourhood Plans must be in conformity with strategic policies in the Local Plan. A review mechanism should be included within any emerging Neighbourhood Plan should this come forward in advance of the emerging Local Plan. - - Site Allocations - - Himor Group and Wainhomes (NW) Ltd Wainhomes and Himor Group are part of the wider Wain Group, which have over 1.1 million sq ft of commercial property assets, over £244 million housing and commercial developments in process, and 2,000 acres of freehold strategic land, and 1,000 acres of third party land in promotion for residential development. Wainhomes is an active housebuilder within West Lancashire, and has a number of interests within West Lancashire. - - West Skelmersdale - Jointly, our Clients have land interests at land to the west of Skelmersdale. This is discussed further in the accompanying submission to the Call for Sites.</p>	
104	<p>Natural England would welcome an early opportunity to meet and discuss how the plan can work to find solutions to these issues at this formative stage, and consider how we can help develop and enhance some of the objectives in the Plan, such as ecological networks, green infrastructure and net gain, as required by NPPF. It would also be beneficial to discuss the evidence that will be needed on which to base an effective HRA assessment as the Plan progresses. - - By identifying and resolving issues early on in the process, we would expect to free up resources to support the development of policy solutions and ensure that your Plan is able to maximise the natural capital of West Lancashire to deliver social, economic and environmental benefits.</p>	
106	<p>We have no detailed observations on the Issues and Options consultation paper other than to confirm the desire to realise the delivery of</p>	

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	development of the Agency's land assets in the borough.	
111	<p>WLBC are currently reviewing the Local Plan (2012-2027). A review of the Plan will assist the Council in meeting the needs of any future opportunities which may arise from existing and planned developments such as the 'Liverpool 2' scheme. - An assessment of the housing and economic growth needs across the Liverpool area, known as Strategic Housing and Employment Land Market Assessment (SHELMA) has been undertaken as well as a Strategic Housing Employment Land Availability Assessment (SHELAA). These will form key evidence base documents for the review of the Local Plan. - This section of our report considers the Strategic Development Options Paper, which identifies a series of strategic development options for the amount and broad location of new housing and employment development. - - Paragraph 1.1.7 of the Strategic Options Paper identifies WLBC's priorities: - "...it is important that whichever options are ultimately selected the Borough - is enabled to grow economically, has good social infrastructure and its - environment is protected and enhanced wherever possible..." - Our Client supports the principle of growth in West Lancashire, this accords with the Framework's requirement to positively and proactively encourage sustainable economic growth as well as significantly boost the supply of housing. - This Representation addresses several of the key questions set out in the Paper. - - The WLBC Local Plan is currently under review. WLBC are currently reviewing the Local plan to assist the Council in meeting the needs of any - future opportunities which may arise such as the 'Liverpool 2' scheme. To assess the housing - and economic growth needs across the Liverpool area a SHELMAA has been undertaken as well as a SHELAA. We are instructed by Priory Asset Management in respect of its land interests land at Land at - Black Moss lane, Aughton Black Moss Lane, Aughton represents a deliverable development site in a sustainable location. - This site would assist the Council in delivering much needed housing immediately. We have assessed the Options Papers having regard to soundness tests set out in Section 182 - of Framework and conclude that the subject site should be released for development.</p>	