



## **West Lancashire Local Plan Review**

### **Issues and Options**

### **Consultation Feedback Report**

June 2017

---

John Harrison DipEnvP, MRTPI  
Director of Development and  
Regeneration

---



## Contents

1.	Introduction	1
2.	Scope of the Local Plan	5
3.	Representations on Strategic Development Policy Options	7
4.	Representations on Economic Policy Options	17
5.	Representations on Environmental Policy Options	27
6.	Representations on Social Policy Options	38
7.	Representations on Spatial Portrait	49
8.	Duty to Co-operate	53
9.	Developers’ Forum	56
10.	Questionnaire work	58
	<ul style="list-style-type: none"> <li>• Edge Hill University</li> <li>• Skelmersdale College</li> <li>• Skelmersdale Concourse</li> <li>• Ormskirk Market</li> </ul>	
11.	Representations on other matters	62
	<ul style="list-style-type: none"> <li>• Strategic Flood Risk Assessment (Level 1)</li> <li>• Strategic Housing and Employment Land Availability Assessment</li> <li>• Sustainability Appraisal</li> <li>• General comments</li> </ul>	
12.	Conclusions	65
Appendix 1	Consultation Questions	67



## 1. Introduction

- 1.1 This report summarises the responses West Lancashire Borough Council received to its consultation on the West Lancashire Local Plan Review: Issues and Options from Thursday 16 March to Friday 28 April 2017. The full set of representations can be viewed on the Council's website:

<http://www.westlancs.gov.uk/planning/planning-policy/the-local-plan/local-plan-review.aspx>

### The West Lancashire Local Plan Review

- 1.2 The West Lancashire Local Plan 2012-2027 was adopted in October 2013. Work commenced on a review of the Local Plan in 2016, with the aim of adopting a new Plan by 2020. The review was commenced, not because there was any problem with the West Lancashire Local Plan per se, but in order to reflect changes in national policy, to explore opportunities that may arise from projects in the wider area (for example, the Liverpool2 Deep Water Terminal that is likely to lead to a significant increase in container traffic, and that could stimulate jobs in logistics and distribution across the Region), and in order that a new plan be in place roughly halfway through the current Local Plan period, as is standard good practice.
- 1.3 Various topic-based and place-based evidence papers were prepared from summer 2016 onwards. From these, the principal planning-related issues affecting West Lancashire were identified. Consultation with Statutory Consultees took place on the scope of the Local Plan Review in autumn 2016. Five issues and options papers were prepared late 2016 / early 2017, along with a set of supporting documents including a Sustainability Appraisal, Strategic Flood Risk Assessment (Level 1), Habitats Regulations Assessment, Strategic Housing and Employment Land Availability Assessment, Infrastructure Delivery Plan, and Housing and Economic Development Needs Assessment.
- 1.4 The Local Plan Review Issues and Options papers comprised the following documents, reflecting the three tenets of sustainability (economic, environmental, social):
- Strategic Development Options Paper – covering the vision and objectives of the Plan, length of Plan period, and amount and distribution of development
  - Economic Policy Options Paper – covering land for industrial / business / commercial uses, the rural economy, and town centres
  - Environmental Policy Options Paper – covering nature conservation, renewable energy, climate change and design of development
  - Social Policy Options Paper – covering accommodation for students, older people, caravan and boat dwellers, travellers, and affordable housing
  - Spatial Portrait – a description of West Lancashire, and the planning-related issues
- 1.5 Each of the above papers contained a series of questions about the various planning-related issues covered, and policy options for addressing them. These questions were the basis for consultation on the Local Plan Review: Issues and Options. In addition, people were invited to comment on the scope of the Local Plan Review, and on the supporting documents referred to above.

### Compliance with the West Lancashire Statement of Community Involvement

1.6 The West Lancashire Statement of Community Involvement (SCI) was adopted in June 2016 (replacing the 2007 SCI). This specifies what level and means of consultation should be undertaken when preparing a local plan. The following extracts from the 2016 SCI set out the consultation and feedback requirements for the Issues and Options stage:

**Table 2.1 Consultation during the preparation of a Development Plan Document** (extract)

Stage	DPD Preparation Stage	Regulation number <sup>1</sup>	Purpose	Consultation required?	Publicity required?
1	Evidence gathering	-	To gather evidence in order to identify the issues and opportunities for development in the Borough	As necessary for each element of evidence	As necessary for each element of evidence
2	Scoping	Reg. 18	To notify persons/groups of the subject of the DPD and invite them to make representations about what the DPD should contain  Comments received will inform the preparation of the next stage	Y	Y
3	Issues and Options	-	To gather evidence on the issues and options for suggested policy directions and to undertake initial work on the Sustainability Appraisal.  To notify persons/groups of the issues for the DPD and invite them to make representations on the issues and options  If consulted upon, comments received will inform the preparation of the next stage	Optional (i.e. not required by 2012 Regulations, but the Council may choose to consult at this stage)	Optional (i.e. not required by 2012 Regulations, but the Council may choose to publicise at this stage)

**Table 2.2 Consultation on emerging DPDs** (extract)

Method	Stage of preparation of DPD	
	Pre-Draft Consultation (Scoping) (Reg.18)	Draft Consultation (Options / Preferred Options) (Optional)
Website	✓	(✓)
Email out (database)	✓	(✓)
Mail out (database)	✓	(✓)
On deposit	✓	(✓)
Press release	Optional	Optional

<sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2012

Method	Stage of preparation of DPD	
	Pre-Draft Consultation (Scoping) (Reg.18)	Draft Consultation (Options / Preferred Options) (Optional)
Press notice	Optional	Optional
Press advertisement	Optional	Optional
Leaflets	Optional	Optional
Neighbour letters	N	N
Staffed exhibitions	Optional	Optional
Unstaffed exhibitions	Optional	Optional
Forums	Optional	Optional
Drop-in sessions	Optional	Optional
Social media	Optional	Optional
Schools	Optional	Optional
Groups consulted / notified	Statutory, general and public.	Statutory, general and public. Representors from previous stage.
Duration	Minimum 4 weeks	Minimum 6 weeks
Feedback Report produced	Y	Y

#### 2.1.4 How will we feed back the results?

Following each round of consultation, the Council will prepare a **Feedback Report** (or Consultation Statement), which will summarise the issues raised through the representations, how the Council has responded to them and what has been changed in the DPD as a result of the comments. This will be shared with Members to inform their decisions on the next stage of the DPD's preparation, and will be published on the Council's website. The Council is not bound to respond to each individual submission / representation to the consultation.

- 
- 1.7 The six week consultation undertaken on the scope of the Local Plan Review (i.e. the 'Pre-Draft Consultation' referred to in Tables 2.1 and 2.2 above) and on Issues and Options (part of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) met all of the 'essential' and many of the 'optional' requirements of the SCI.
- 1.8 With reference to paragraph 2.1.4 of the SCI quoted above, it is important to point out that this Consultation Feedback Report does not contain the Borough Council's responses to representations received (this will be done, where necessary, at a later date), but simply summarises the comments made by respondents.

### Consultation Methods Used

- 1.9 Consultation methods used included a mailout to all people or organisations on the Council’s planning policy consultation database, the website, placing material on deposit in libraries and Council offices, a press release, press notice, a four page ‘newspaper wrap’, leaflets (posted to all those who do not receive the free weekly newspaper), and on-street questionnaires (in Ormskirk town centre, Skelmersdale Concourse, Edge Hill University, and Skelmersdale College).
- 1.10 Six public workshops were held across the Borough, at which people were invited to give their views on a series of selected questions, and / or on any other relevant topics of particular importance to them. The workshops were as follows:
- |               |                                       |
|---------------|---------------------------------------|
| 27 March 2017 | The Grove Community Centre, Burscough |
| 29 March      | The Ecumenical Centre, Skelmersdale   |
| 3 April       | Parbold Women’s Institute             |
| 6 April       | Chapel Gallery, Ormskirk              |
| 10 April      | Halsall Memorial Hall                 |
| 12 April      | Tarleton Academy                      |
- 1.11 In addition, a forum was held with Council Members on 8 March 2017, with Parish Councillors on 21 March, with (housing and commercial) developers and their agents on 20 March, and a meeting was held with neighbouring local authorities under the ‘Duty to Co-operate’ on 27 March.

### Structure of this Report

- 1.12 This Consultation Feedback Report is structured as follows:
- Representations on Scope of the Local Plan (Chapter 2)
  - Representations on Strategic Development Options (Chapter 3) – this summarises the comments received from the online questionnaire, from Borough Council Members (at the Members’ Forum), from Parish Councils, and at the public workshops; similarly with Chapters 4-6 below
  - Representations on Economic Policy Options (Chapter 4)
  - Representations on Environmental Policy Options (Chapter 5)
  - Representations on Social Policy Options (Chapter 6)
  - Representations on the Spatial Portrait (Chapter 7)
  - Comments made under the Duty to Co-operate (Chapter 8)
  - Comments made at Developers’ Forum (Chapter 9)
  - Responses to questionnaire work (Chapter 10)
  - Representations on other matters, e.g. Sustainability Appraisal, Strategic Flood Risk Assessment, Strategic Housing and Employment Land Availability Assessment (Chapter 11)
  - Conclusions (Chapter 12)



## 2. Scope of the Local Plan

- 2.1 The Borough Council consulted with Statutory Consultees in autumn 2016 with regard to the content to the new Local Plan Review. A copy of the feedback report for this consultation is available to download at <http://www.westlancls.gov.uk/localplan>. As part of the consultation on the Local Plan Review Issues and Options, the invitation to comment on the scope of the Plan was extended to the wider public and other stakeholders, in line with the 2016 Statement of Community Involvement.
- 2.2 The purpose of this consultation was to ascertain views on what subjects and policies the Local Plan should contain. 15 stakeholders responded in total. There was some cross-over between the comments submitted through the specific Scoping consultation and those made through the Issues and Options consultation. Therefore much of the summary below is repeated in later stages of this report.
- 2.3 Respondents to the Scope of the Local Plan consultation considered that economic, environmental and social policies should be granted equal merit and importance. Nevertheless, key issues appeared to relate to infrastructure, the delivery of affordable housing, the availability of elderly housing, the sustainability of the environment, the protection of Green Belt and agricultural land, and minimising flood risk.
- 2.4 Many respondents considered that infrastructure delivery should be of primary importance, including transport services, community services, health care and broadband provision. Respondents, particularly those in rural areas, were concerned about the loss of rural services and employment opportunities as local businesses were commonly lost to residential developments. Policies for the protection and/or provision of small scale business units / development in local villages was supported. Respondents considered that improvements to transport infrastructure would also bring improvements to air quality and health.
- 2.5 Large amounts of support were received for the delivery of affordable housing, particularly in rural areas, although some considered that the definitions of affordable housing (set by national, rather than local, policy) should be redefined as they currently cannot provide 'truly affordable' housing (i.e. housing at a cost marginally lower than market still does not make it affordable to many people). Respondents also stressed the need for elderly housing, and/or the provision of support for the elderly to enable them to remain in their existing homes. The provision of support for the elderly links closely back to infrastructure and accessibility to social care and transport facilities.
- 2.6 Sustainability and the environment were considered very important. Respondents want new buildings to be designed with energy conservation and the environment in mind and felt policies should require developers to provide renewable energy design features and respond to climate change. In residential developments a mix of housing types and tenures is supported to provide choice. Buildings should be of good design, location and quality. Planners should continue to consider how developments impact on school places and respond accordingly. On residential developments, respondents wanted

- adequate parking to be provided by developers, including adequate garage sizes so that cars can be parked off-road. Traveller sites should be located away from flood risk zones.
- 2.7 Respondents considered it important that the arable farmland in the Borough, as prime grade agricultural land, should be protected from development in order to provide food for the nation.
- 2.8 Some respondents saw a need to encourage a more youthful and diverse population to live in the Borough, seizing on opportunities to engage with Edge Hill University and local employers. Conversely, others thought greater control should be placed on Edge Hill to prevent it expanding any further into the green belt and to reduce problems relating to HMOs and the loss of market housing in Ormskirk.
- 2.9 There was support for policies which can serve to enhance cultural and community facilities. Respondents suggested policies should be designed to address the erosion of town centres, considered to be created by a loss of retail mix, too many low cost retailers and high rents for shop units.
- 2.10 Some respondents wanted the issue of gridlocked traffic in Ormskirk to be addressed. There was support for the provision of off-road pedestrian and cycle routes to provide an alternative to car use, ensuring they link to new housing developments, which can also serve to improve physical activity and exercise.
- 2.11 Some respondents identified the growth agenda of the wider Liverpool City Region, and the role of West Lancashire within it, as an important issue. It was stressed that within the City Region there are growth opportunities for the Borough which, in turn, could help to tackle many of the issues that have been identified for the Borough. It was considered important to have a balanced and sustainable development approach that can integrate land use and transport, regeneration and economic development, social inclusion and tackle climate change.

### 3. Representations on Strategic Development Policy Options

- 3.1 This chapter summarises the representations made on the questions relating to the Strategic Development Policy Options. For this chapter, and for chapters 4-6 following, comments received on the online questionnaire are summarised first, followed by comments made by Members at the Members’ Forum (see 1.11 above), comments made by Parish Councils, and comments made at the public workshops (see 1.10). For clarity, any Parish Council comments submitted via the online survey are recorded in the ‘Feedback from Parish Councils’ section, rather than the ‘Feedback from Online Surveys / Written Representations’ section. Comments from neighbouring authorities are summarised in Chapter 8: Duty to Co-Operate, rather than in Chapters 3-6.
- 3.2 The Strategic Development Policy Options questions<sup>2</sup> covered the following matters:
- The draft Vision
  - The draft Objectives
  - Required annual amounts of development
  - The plan period
  - The sub-division of West Lancashire into ‘spatial areas’
  - Distribution of development around the Borough
  - Location of new development in relation to existing development
  - Infrastructure

#### Feedback from Online Surveys / Written Representations

##### **7. A draft Vision for West Lancashire**

*The Vision<sup>3</sup> is what the Council would like to see achieved for West Lancashire, based on the current evidence available. 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?*

- 3.3 31 out of a total 45 respondents<sup>4</sup> supported or broadly supported the Vision. One described it as ‘idealistic’; another said it should be more aspirational. A number of additions were recommended to the Vision, including (greater) reference to farming and food production / the food processing sector, renewable energy, living within one’s environmental means, sustainable travel, carbon-neutral development, the historic environment (in addition to historic buildings), accommodation for the elderly, meeting housing needs in full, helping meet neighbouring authorities’ needs, quality family accommodation, retaining a skilled workforce, economic development and growth

<sup>2</sup> Three questions relating to the Spatial Portrait (questions 4-6) were included in the ‘Strategic Development Options’ document; responses to these questions these have been summarised in Chapter 7 (Spatial Portrait) of this Feedback Report.

<sup>3</sup> See Appendix 1 for the Vision.

<sup>4</sup> The 45 respondents exclude Parish Councils and neighbouring authorities: their representations are considered elsewhere (Parish Councils in a separate section in this chapter, neighbouring authorities in Chapter 8).

being a key priority, growing the smaller settlements, the Northern Parishes as a location for growth, and Green Belt release.

- 3.4 One respondent recommended that the Vision contain specific ambitions for each of the key spatial areas; another recommended that the word ‘fantastic’ be removed.

### **8. Objectives**

*Are the draft Objectives<sup>5</sup> seeking to achieve the right things? Are they specific enough, or are they too detailed? Have we missed anything out?*

- 3.5 19 of the 39 respondents who commented on this question expressed general support for the Objectives as a whole. Others highlighted support for individual Objectives, in particular Objective 6 (housing). One respondent described the objectives as ‘complex’, whilst four others considered they were lacking in detail, too vague to inform how the Vision would be delivered. One described them as ‘anodyne’, applicable to anywhere, and recommended that they be made more West Lancashire-specific. One stated the Plan could not solve many issues of health and inequality; another stated the Objectives were admirable, but would fail. Two advised that the Objectives should be more aspirational and pro-growth. Only one disagreed with the Objectives as a whole.
- 3.6 A number of changes were proposed to individual Objectives, as follows:
- Add ‘sustainable’ to Objectives 3,6,7 and 10;
  - [Conversely...] refer to the Presumption in Favour of Sustainable Development rather than ‘sustainability’ (Objective 1);
  - Refer specifically to flood risk, either in Objective 3 or 10;
  - Add ‘family housing’ to Objective 6;
  - Objective 7 should include the retention of existing businesses, and should be worded more positively in terms of the Borough’s wider economic role;
  - Objective 10 should refer to ‘ecological networks’ (alternative wording suggested);
  - Add an Objective 11 supporting the agricultural and food processing industry;
  - A ‘stand-alone’ Objective should be provided on the historic environment.

<sup>5</sup> See Appendix 1 for the Objectives.

**9. Strategic Development Options**

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

*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*

- 3.7 The 48 responses to this question spanned the whole range of options. 13 individuals expressed a preference for Options A and / or B, citing the need to protect Green Belt and the Borough's prime agricultural land, to meet only this Borough's needs, and to maximise use of brownfield land. Agents responding on behalf of landowner or developer clients favoured the higher options – 11 expressed a preference for Option C or above, 4 (plus 2 individuals) for Option D or above, and 7 for Option E. The reasons given for the support for the higher figures were to follow national policy to 'boost significantly' the supply of housing, to be ambitious and promote economic growth, to aim to meet affordable housing needs, and to help meet the needs of constrained neighbours in the Liverpool City Region. Many respondents referred to the SHELMA and reserved the right to make further comments once this study, and with it a clearer picture on the need for inter-Borough development distributions, becomes available.

**10. The Local Plan Period**

*We are considering two time periods for the Local Plan:*

- *Option I - 2012 to 2037*
- *Option II - 2012 to 2050*

*Should the Council go for a standard Plan Period or plan longer term? Why?*

- 3.8 With regard to the plan period, 48 responses were received. 20 supported a 'standard' plan period going to 2037; 19 supported a longer plan period. The remainder advised a 'hybrid approach' whereby land was allocated to meet development needs to 2037, and further land was safeguarded to meet needs to 2050, thereby removing the need to alter Green Belt boundaries at the end of the Plan period (which would be the case for both a 2037 and 2050 end date for the Plan). Advocates of this approach cited national policy (NPPF paragraph 85) and the 2016 findings of the Local Plans Expert Group to support their choice of option.
- 3.9 Reasons for favouring the standard, or shorter, plan period included the need to be flexible, the fact that 2050 was well beyond the end of the available evidence base, and that matters are very difficult to predict in the long term given things change quickly. Reasons for advocating the longer plan period included the need for certainty and the long timescales needed to achieve regeneration and to influence climate change.

3.10 One response expressed concern at the 2012 base date, recommending 2017 instead.

**11. Distributing the development requirements across West Lancashire**

*(A map was provided showing the proposed subdivision of the Borough into spatial areas.) Are the proposed spatial areas appropriate<sup>6</sup>? If not, how should the Borough be divided up to help identify where development should go?*

3.11 Of the 26 stakeholders who commented on Question 11, 18 supported the proposed key spatial areas. The requested changes to, or additional comments on, the subdivision of the Borough were:

- Up Holland should be considered separately from Skelmersdale;
- Aughton should be considered separately from Ormskirk (although another respondent expressed the opposite view);
- Appley Bridge should be considered with Wigan rather than the Eastern Parishes;
- Newburgh and Parbold should be considered as part of Skelmersdale and the South Eastern Parishes;
- It is important to recognise the ‘synergy’ between the different spatial areas, and that they do not operate independently.

**12. Distribution of new development**

*We have identified four realistic potential scenarios that we might wish to take forward:*

- *Scenario 1: Spread new development around West Lancashire according to the proportionate size of existing towns and villages.*
- *Scenario 2: Focus new development in and around the key service centres of Skelmersdale, Ormskirk and Burscough*
- *Scenario 3: Allocate less development to the key service centres and more to the rural areas such as the Northern Parishes.*
- *Scenario 4: Focus development on Skelmersdale; grow Skelmersdale significantly more than the other key service centres.*

*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 any way?*

3.12 In terms of the general distribution of development around the Borough, opinions varied widely amongst the 51 stakeholders who commented. 4 supported Option 1 (reflect the current distribution), one representation referring specifically to Ormskirk’s size; 15 chose Option 2 (Key Service Centres) citing the existence of infrastructure in those locations as a reason to direct development there; 3 chose Option 3 (rural focus) – although (see below) others supported more development in rural communities; 13 preferred Option 4 (Skelmersdale focus), citing the existence of infrastructure there,

<sup>6</sup> See Appendix 1 for the map of proposed spatial areas.

and the need for regeneration. In addition, 9 respondents advocated a ‘hybrid’ approach, most notably a combination of Options 2 and 3.

3.13 Other points made in response to Question 12 included:

- There should be flexibility in allowing development to come forward in different areas, once the spatial distribution is finalised;
- Delivering high levels of growth in Skelmersdale will be challenging;
- Priority should be given to brownfield sites and minimising Green Belt release;
- In terms of minimising settlements merging, any Green Belt release should be between Ormskirk and Southport, reflecting links between these two settlements.

### **13. The location of new development**

*Where should new development be located in principle?*

- *Option 1: Maximise the capacity of existing settlements by prioritising infill developments within built-up areas or by building higher*
- *Option 2: Locate new development adjacent to existing settlements to reduce the need to travel and reduce emission.*
- *Option 3: Create brand new settlements with the necessary associated infrastructure*
- *Option 4: Entirely restrict new development in areas at risk of flooding*

*Are there any key constraints (such as flood risk) which would mean development should be severely limited in the areas affected by those constraints?*

3.14 Question 13 received 51 responses. 14 expressed a preference for Option 1 (restricting new development to existing settlements), 19 for Option 2 (building on the edge of existing settlements), and 4 for Option 3 (new settlement). 16 agreed with Option 4 (avoid development on land at risk of flooding), bearing in mind this option was not mutually exclusive with any of Options 1-3. In addition, 10 respondents advocated a hybrid of Options 1 and 2, i.e. developing suitable sites within existing settlements as the starting point, then meeting the remainder of the development requirements on land adjacent to settlements.

3.15 Other pertinent points made in relation to Question 13 were as follows:

- Option 1 is predicated on the need to ensure suitable sites exist within settlements;
- Amend Option 1 to include prioritising infill / high rise on underutilised land;
- Whatever approach is chosen, this should not preclude the development of other suitable sites where these are available;
- Option 2 should consider non-Green Belt land (Protected Land) before Green Belt land;
- One respondent referred to a study that concluded that for new settlements, it typically takes 5.5 years for development to commence;

- In terms of flood risk, the Environment Agency advised *inter alia* that development on land free from flood risk could adversely affect other land at risk of flooding. Two respondents expressed the view that a blanket approach (Option 4) could be unsuitable in that it may preclude consideration of certain suitable sites where the flood risk could readily be mitigated satisfactorily.

#### **14. Providing infrastructure and services**

*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?*

- 3.16 Infrastructure provision was raised as a crucial issue by several respondents. The main areas of deficiency mentioned were transport-related: public transport, in particular bus and rail services, with the lack of a rail station at Skelmersdale cited several times. The road network was mentioned, both in general terms, as well as more specific areas, including Hesketh Lane (Tarleton), and Burscough. It was recommended that road safety be taken into consideration in the Plan. Other areas of deficiency included secondary education in Skelmersdale, water supply (Tarleton), drainage and sewerage (Burscough in particular), and the lack of a strategic approach to Green Infrastructure.
- 3.17 In terms of good infrastructure provision, examples given were the road network in and adjacent to Skelmersdale, and the Borough's links to the motorway network. Other points made in relation to infrastructure included:
- New development can help provide infrastructure (developer contributions);
  - One can take into account infrastructure provision in neighbouring authority areas, for example Sefton;
  - Spreading development on small sites should lessen the need for infrastructure provision;
  - Land use planning and transport should be integrated.

#### **Feedback from West Lancashire Borough Council Members**

- 3.18 As stated in Chapter 1, a Members' Forum was held on 8 March, asking West Lancashire Borough Councillors a number of the Issues and Options consultation questions in discussion groups. Under the Strategic Development Options, Members were asked Questions 9, 10, 12, 13, and 14.
- 3.19 In terms of annual development targets (Question 9), some Members favoured the highest option (Option E: 600 houses, 6ha of employment land) per year, aiming for ambitious growth in the Borough. Others chose Option B, citing constraints such as land at risk of flooding, and infrastructure capacity.
- 3.20 Some Members expressed a preference for the longer plan period (2012-2050), seeking to plan ahead to encourage investment, regeneration and infrastructure provision.



- Others preferred the standard plan period (to 2037), one reason being to reduce the amount of Green Belt land that could potentially be released.
- 3.21 For Question 12 (distribution of development across the Borough), the vast majority of Members preferred Option 4: Skelmersdale focus, in order to deliver regeneration and a rail station for Skelmersdale. Some Members also favoured a strategic site at Ormskirk, and others favoured rural employment.
- 3.22 In terms of the location of new development in relation to existing development, most Members chose Option 2: Building on the edge of existing settlements. The view was expressed that a small amount of Green Belt could be sacrificed to protect green space and parks within settlements, with the proviso that the sites released should be small, and the locations of Green Belt release determined in accordance with local infrastructure capacity. ‘Garden City’ principles were supported by a number of Members.
- 3.23 As far as infrastructure deficiencies were concerned, Members highlighted public transport issues including the need for improved rail facilities (Skelmersdale, and the Burscough Curves), the road system – in particular in Ormskirk and Burscough Centres and on the A5209 (Burscough - M6), Skelmersdale Town Centre shops and its evening economy, the physical environment of estates in Skelmersdale, and wastewater treatment capacity.

### **Feedback from Parish Councils**

- 3.24 As stated in paragraph 1.11 above, Parish Councils were invited to a consultation forum / workshop on 21 March 2017, at which a number of issues and options were discussed. Representatives from 8 Parish Councils attended (Aughton, Bickerstaffe, Burscough, Downholland, Halsall, Lathom, Newburgh and Up Holland). Online representations were made by 7 Parish Councils (Aughton, Burscough, Dalton, Halsall, Lathom, Scarisbrick, Up Holland), meaning that a total of 10 Parish Councils engaged with the Issues and Options consultation.
- 3.25 For the Vision (consultation question 7), only two comments were made. Halsall Parish Council (HPC) advised that the Vision should emphasise rural employment, affordable accommodation for the elderly, and 1-2 bed ‘first time’ homes. Up Holland Parish Council (UPC) considered there was too much emphasis on housing, and not enough on rural land uses and the environment.
- 3.26 In terms of the Objectives (question 8), two comments were made: HPC considered the Objectives needed more detail as to how they would be achieved and address specific issues. UPC stated the titles were reasonable, but definitions were open to interpretation, in particular ‘sustainable development’, in which the economic aspect often appeared to outweigh the social and environmental aspects in decision-making.

- 3.27 For question 9 (amounts of development), four Parish Councils (PCs) responded. UPC and Burscough PC chose Option A: 200 houses / 2ha employment land. BPC's view was that the Borough should take the minimum amount of development it is allowed to, referring to 2015 Government Select Committee material on the interpretation of the term 'sustainable development' (see also 3.26 above). Lathom PC's choice was similar to Option B: 300 houses / 3-4ha employment land. HPC chose Option C: 400 houses / 4ha employment land, in order to respond to housing and employment land needs.
- 3.28 For the plan period (question 10), five PCs responded, four choosing 2037 and one choosing 2050. The reasons for a shorter plan period were that this would lessen the threat of Green Belt release, would be more realistic and provide more flexibility in an ever-changing environment, and that 2050 was too far in the future to plan for. The reason for choosing the longer period was to give stability.
- 3.29 Two PCs commented on the subdivision of West Lancashire into spatial areas (question 11). HPC agreed with the proposed subdivision. UPC considered that it did not reflect the current and historical pattern of Up Holland in relation to Skelmersdale, and that it was not understood why the two settlements should be considered as one.
- 3.30 There were three comments on the scenarios for the distribution of development (question 12). HPC and UPC preferred Scenario 1: Reflecting existing development patterns. UPC added that there should be minimal new development in Up Holland. Burscough PC's choice was Scenario 4: Skelmersdale focus, along with development on the south side of Ormskirk, with links to Merseyside and the motorway network.
- 3.31 For question 13 (location of new development in relation to existing), HPC and UPC chose Option 1: accommodating new development within existing settlements. Dalton PC did not choose an option, but advised that safeguarded land should remain safeguarded in the next Local Plan. At the PC Forum, the general consensus was that new places require entirely new infrastructure so it is better to keep existing settlements vibrant and sustainable by allowing some new development. However, development should be small scale and an incremental approach would be better.
- 3.32 In terms of infrastructure deficiencies and strengths, the comments from the PC Forum meeting were as follows:
- Rural public transportation – bus services have been withdrawn, and the future is looking bleak. There is a need for a sustainable rural transportation system that works for different age groups. As the population ages, dependency upon public transport increases;
  - The road network is under stress; the condition of roads is very poor in places, not being designed for the size of vehicles using them;
  - Rail does not serve all areas; the Up Holland line is single track and hourly. A rail link to Skelmersdale will improve matters;
  - Bickerstaffe is one of the 3% of areas that does not have broadband access.
- 3.33 Individual Parish Council comments made online are summarised as follows:

- BPC: Concerns about surface water and sewer flooding;
- HPC: Concerns about rural (moss) roads; bus services (e.g. Shirdley Hill now has none); drainage provision, leading to localised sewage flooding;
- UPC: rail services for Up Holland are poor; investment is needed in environmental corridors, walkways and cycleways.

## Feedback from Public Workshops

### Infrastructure

- 3.34 The following infrastructure-related issues were raised consistently Borough-wide:
- The condition, capacity, and use of the road network – people referred to pot-holes, crumbling or sinking roads, traffic congestion at certain points or times of day, and large vehicles on unsuitable rural lanes or passing through settlements;
  - Public transport - a lack of, or cuts to, bus services, especially in rural areas; lack of, or limited availability of, evening bus services; limited availability of rail services, some areas having no rail access, others having infrequent services;
  - Parking – in town or village centres, or at stations;
  - Retail provision – people needed to, or tended to, visit neighbouring authorities for certain types of retail.
- 3.35 Area-specific infrastructure issues may be summarised as follows:
- Burscough – drainage and sewerage capacity; traffic issues (A59 / A5209 through Burscough, and on moss roads);
  - Eastern Parishes – traffic on rural roads, including A5209; limited parking at Parbold and Appley Bridge stations;
  - Northern Parishes – traffic congestion through Tarleton and Hesketh Bank, unsuitable vehicles (HGVs) on rural roads; water pressure;
  - Ormskirk – parking issues, relating to local and University traffic; traffic congestion in and around the Town Centre;
  - Skelmersdale – lack of sports and leisure facilities; poor evening / night-time economy; quality of education provision, e.g. no A-levels offered at college, quality of secondary schools.

### Location of new development

- 3.36 The matter of where, in general, new development should be located in relation to what already exists, and the related matter of Green Belt release, were discussed at each workshop. The following points were made:
- On the whole, people were not supportive of significant amounts of new development on large sites, but would accept small-scale sites on the edges of settlements, provided it was meeting a local need, e.g. affordable / old persons / ‘downsizer’ / first-time buyer properties, and not a wider need;
  - Prime agricultural land should be protected from development;

- Green Belt land should only be used as a last resort;
- Infrastructure must be provided in advance of new development.

## 4. Representations on Economic Policy Options

4.1 This chapter summarises the representations made relating to the seven questions on Economic Policy Options, which covered the following:

- Providing new employment land
- Policy for existing employment areas
- The rural economy
- The network and hierarchy of town, village and local centres
- Ensuring healthy town, village and local centres
- Sites for town centre uses
- Any other economic policy issues

4.2 In addition, relevant responses were received in relation to the 'catch-all' question 37: *Do you have any general comments to make on the Issues and Options consultation?*

### Feedback from Online Surveys / Written Representations

4.3 A total of 56 responses were received to one or more of the Economic Policy Options questions (including 4 responses under the general question 37) from members of the public and other stakeholders via the online surveys and paper representation forms.

#### **15. Land for employment uses**

*Which policy option or options for how we should allocate land for employment sites do you think is the most appropriate for West Lancashire?*

1. *Allocate sites specifically for strategic distribution and warehousing.*
2. *Allocate sites to encourage geographical clusters of specialist employment uses.*
3. *Allocate all new sites for the range of business class uses.*
4. *Increase town centre office sites.*

*Why? Is there an alternative option?*

4.4 34 responses were received in relation to question 15; these included 4 comments from Parish Councils, dealt with separately under the Feedback from Parish Councils section below<sup>7</sup>.

4.5 These options are not mutually exclusive and more than one approach could be taken forward in combination in the emerging Local Plan. 11 respondents considered that a combination of options would be required in the emerging Local Plan to enable the allocation of an appropriate employment land portfolio. Option 1 (5 responses) was the most popular of the responses to any single option, followed by Option 2 (4 responses) with Options 3 and 4 registering just one favourable response each. One respondent

<sup>7</sup> This is the case for all questions in this section, and also in Chapters 3 and 5 of this Feedback Report.

expressed the view that none of the options were suitable and put forward an individual site for employment uses instead.

- 4.6 Other comments made in relation to question 15 can be summarised as follows:
- Local businesses should be supported;
  - Light industries should be retained in villages;
  - More skilled employment is needed in the Borough;
  - In connection with Edge Hill University, Ormskirk would be a good location for specialist employment uses;
  - There are already a number of vacant warehouses in Skelmersdale and poor transport for the local workforce;
  - Strategic warehousing should be located more widely than the M58 corridor / Skelmersdale;
  - The view of traditional 'employment' jobs has changed and there is a growing job market around sport that needs to be considered.

#### **16. Existing Employment Areas**

*What kind of protection do you think the Local Plan should give existing Employment Areas? Why? Is there an alternative option?*

1. *Continue with the existing Local Plan policy approach.*
2. *Protect all existing employment areas for business class uses.*
3. *Designate selected employment areas for non-business class uses.*
4. *Do not protect employment areas for business class uses.*

- 4.7 21 responses were received to this question. 15 responses could be directly related to the 4 options, with other comments also being of relevance.
- 4.8 Option 1 (9 responses) was by far the most popular with a smaller amount of support in relation to Options 2 (3 responses), 3 (2 responses) and 4 (1 response) respectively. The support for Option 4 was under circumstances where there would be no demand for an employment site. Other comments made in relation to question 16 are as follows:
- There should be a more vigorous consideration of viability than at present before alternative, non-employment uses should be allowed on employment sites;
  - Sites that no longer meet business needs should be considered for alternative development;
  - Jobs are being created in sports. Some protection of employment sites is required but it should depend upon employment and training opportunities created;
  - Other (non-business class) uses need to be accommodated in employment areas, potentially in combination with extending those areas;
  - Some employment uses are “bad neighbours” due to noise, pollution or traffic and are not suitable to be in close proximity to housing.

**17. The Rural Economy**

*What do you think about the policy options for supporting the rural economy? Is there an alternative option?*

1. *Continue with the existing Local Plan policy.*
2. *Increased development in rural areas.*
3. *A tourism and visitor economy policy.*

4.9 27 responses were received in relation to question 17. Options 1 and 2 are mutually exclusive, but Option 3 could be combined with either of those approaches. There was a relatively even distribution of preferences: Option 3 was the most popular (7 responses) with Options 1 and 2 both receiving support from 5 respondents. A further two responses advocated a combined approach of Options 1 and 3.

4.10 Other relevant comments in relation to question 17 are as follows:

- There is a need to support small work units and farm enterprises;
- Increased rural development would be more likely to result in people being able to live where they were brought up;
- Rural areas require increased packing and distribution businesses; however, good highway access would be required;
- An approach based upon tourism and the visitor economy would be more sustainable over the medium to long term compared the currently unsustainable practices of agricultural drainage and ploughing;
- In connection with tourism, the Borough has unique potential in terms of wildlife sites, waterways, the Tawd Valley and the Cloughs of Skelmersdale;
- Concern over the failure to deliver business development in rural areas as part of mixed use schemes including housing.

**18. Network and Hierarchy of Centres**

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

4.11 There being only one 'Option' under this question, only 10 responses were received. There was most support for the review of the hierarchy. Specific comments in relation to the network and hierarchy of centres were:

- The hierarchy should be flexible enough to take into account that some areas, e.g. Skelmersdale, need significant increases of activities associated with town centres;
- Support for the continued growth of centres within the hierarchy;
- Review the hierarchy as small village centres are failing;
- Some respondents confused centre hierarchies with settlement hierarchies.

**19. Ensuring Healthy Town, Village and Local Centres**

*Do you support any of the options for Ensuring Healthy Town, Village and Local Centres:*

- 1. Review town centre, village and local centre boundaries.*
- 2. Review Primary Shopping Area boundaries.*
- 3. Review the policy approach to determining appropriate uses in town centres.*

*If so, why? Is there an alternative option?*

4.12 22 responses were received in relation to question 19. The three Options are not mutually exclusive and could be combined. There was greatest support for Option 3 (6 positive responses) followed by Option 1 (5 responses). Whilst Option 2 received just one response, 5 respondents advocated support for a mix of options which included option 2. Therefore, it can be concluded that there was broad support for the review of centre boundaries, Primary Shopping Area boundaries and the policy approach for uses in town centres.

4.13 Other comments received can be summarised as follows:

- A Primary Shopping Area should be identified for Skelmersdale and the site recently granted planning permission for town centre uses should be included within it.
- Conversely, the Concourse Shopping Centre is vulnerable and in need of protection and the site granted planning permission for town centre uses outside the Concourse should be excluded from being within the town centre boundary.
- Centres are changing due to changing shopping and leisure habits and therefore policy needs to be flexible. There has been a loss of retail and growth of cafes, bars and charity shops, particularly in Ormskirk town centre.
- The existing policy to retain a minimum percentage of A1 (retail) uses is not supported.
- There is support for mixed and diverse town centres beyond Primary Shopping Areas; retail should be allowed to change to cafes, bars etc. Housing should be allowed in large village centres.
- The policy option to consider appropriate uses in town centres could be used to contribute towards healthy town centres and tackle health indicators associated with obesity and alcohol consumption.



**20. Sites for Town Centre Uses**

*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 most appropriate and why? Is there an alternative option? The Options are:*

1. *Adopted Local Plan approach – Skelmersdale concentration.*
2. *Allocate sites for town centre uses at Ormskirk.*
3. *Allocate a non-town centre site for a retail warehouse park.*
4. *Allocate a site to meet retail needs in the north of the Borough.*

4.14 Of the 21 responses received on question 20, 18 (86%) could be directly related to the 4 Options. The Options are not mutually exclusive; however the degree of concentration under Option 1 would affect emphasis upon Options 2 and 4. There was clear support for Option 1 (11 positive responses), with the only other support for a single Option being Option 4 (1 response). However, 6 responses advocated a mix of options including the selection of Option 2 (Ormskirk) and Option 4 (north of the Borough). There was virtually no support for option 3.

4.15 Other comments received can be summarised as follows:

- There has been substantial leakage of comparison goods expenditure from the Borough. The case for retail development and other town centre uses in Skelmersdale remains clear.
- Make Skelmersdale town centre the priority for investment.
- Develop Ormskirk as a market town with a distinctive mix of smaller shops and offices.
- Out of centre retail parks are not a sustainable solution and the Borough does not need more of them.

**21. Other Economic Policy Issues**

*Are there any other economic policy issues that should also be considered? If so, what?*

4.16 31 responses were received to this question, of which several were reallocated, being more pertinent to questions 15-20. The remainder can be summarised as follows:

- The balance between jobs and new homes is critical;
- Invest in small and medium sized enterprises to prevent settlements becoming dormitories;
- Existing light industrial zones such as Pimbo should be given priority in attracting new and varied businesses including hi-tech;
- Site requirements to meet expansion needs of a particular business were outlined;

- There is a need to attract and create a more highly skilled workforce and attract better quality jobs. There should be partnership working with educational establishments creating more work placements;
  - Consider deprivation statistics when preparing Preferred Options. Economic growth is a means of addressing persistent unemployment and income deprivation. Access to employment, education and training should be a key consideration;
  - A comprehensive masterplan is needed for Skelmersdale town centre. This should include the Concourse shopping centre;
  - The economic value of the Borough's natural capital needs to be addressed;
  - Waterways create a sense of place. A linear park along the River Tawd should positively impact on the visitor economy;
  - There was no mention of the potential impact of flooding on the area's agricultural and horticultural economy in the Economy Paper. This should tie with the Environment Paper where it is considered;
  - The threat of flooding to the rural economy has not been identified. It is important to understand how agriculture integrates into the wider economies of the Borough and Lancashire.
- 4.17 10 relevant responses were received in relation to the 'catch-all' question 37, of which six were reallocated and considered under questions 15-20. Other comments were:
- Shale gas should be encouraged;
  - A vital opportunity to reconfigure and improve out of date industrial estates was missed by the Adopted Local Plan;
  - Existing employment sites could be reconfigured to provide housing and boost the local economy.
- 4.18 In addition, a small number of potential economic development sites were put forward.

### **Feedback from West Lancashire Borough Council Members**

- 4.19 The Members' workshop considered 5 questions from the Economy Policy Options Paper (nos. 15, 16, 17, 19 and 20). In relation to question 15, the allocation of land for employment purposes, views expressed can be summarised as follows:
- The M58 corridor and Skelmersdale was seen as a good development opportunity given access to wider road networks. However, there were concerns that warehousing would provide lower quality jobs at lower job densities.
  - Estates at Burscough were also viewed as suitable employment locations but accessibility needed to be improved.
  - Links with Edge Hill University and other business and educational providers needed to be improved to develop skills and employment opportunities. Students needed to be retained through the creation of jobs locally.
  - Business start-ups / incubator units would be desirable for Ormskirk and rural areas.

- There were conflicting views about whether a logistics opportunity to transfer agricultural produce from smaller to larger vehicle would be feasible.
- 4.20 In relation to question 16, existing employment areas, views expressed were that there could be scope for the expansion of, or creation of, another Skelmersdale Investment Centre type development but other services would be required to go alongside this type of out of centre development. The need to address the poor design of some estates in Skelmersdale e.g. Gillibrands East and West was also raised.
- 4.21 Under Question 17 (rural economy), discussions were that low cost offices could be developed and some farm buildings had been successfully converted to business use.
- 4.22 Question 19, ensuring healthy town, village and local centres, discussions were that the current policy restricting uses along town centre frontages should be relaxed but that in so doing inactive frontages should be avoided.
- 4.23 In relation to question 20, sites for town centre uses, views were that the night time economy needed to be developed, particularly at Skelmersdale. Additional discussions were that Burscough and the Northern Parishes do not have the infrastructure to accommodate additional retail development and that it would be desirable to get retail back into Ormskirk centre.

#### **Feedback from Parish Councils**

- 4.24 The Parish Council Workshop considered 3 questions from the Economy Policy Options Paper (questions 15, 16 and 19).
- 4.25 Feedback in relation to question 15 (the allocation of land for employment purposes), indicated that Skelmersdale was a suitable location for logistics uses and that there was no purpose in locating such uses in areas with poor links to the strategic road network. In relation to other specialist uses, incubator units were considered to be desirable.
- 4.26 Views in relation to question 16 (existing employment areas), were that allowing residential development on business sites (especially in villages) was not good practice as it was important to retain local business and jobs. Skelmersdale Investment Centre was viewed as a good facility with potential for expansion.
- 4.27 Question 19 feedback, particularly in relation to the uses allowed in town centres, was that allowing change of ‘town centre’ uses to residential would result in a loss for the wider community. However, changes of use from residential to commercial should be supported in principle. It is questionable whether vacant units in Ormskirk town centre will be able to attract new retail businesses. Given the growth in internet shopping there may be less need of ‘bricks and mortar’ retail.
- 4.28 Written responses were also received from four Parish Councils in relation to the Local Plan Issues and Options public consultation. Comments in relation to question 15, the allocation of land for employment purposes, can be summarised as follows.

- Preferences were expressed for Options 1 (strategic distribution and warehousing), 2 (geographical clusters of specialist uses) and 3 (allocate for the range of B class uses). The distribution of sites by the adopted Local Plan was also considered suitable, provided account could also be taken of rural and tourism opportunities;
  - A flexible policy approach is needed given uncertainty in relation to future business requirements but change of use from business to housing should not be allowed.
  - Due to the design and size of town centres future expansion is an issue;
- 4.29 Written responses from Parish Councils in relation to question 16 (existing employment areas) expressed a single preference for the continuation of the existing Local Plan approach (Option 1). In addition, the need for out of town non-industry is recognised provided adequate provision can be made for pedestrians.
- 4.30 Question 17 (the rural economy) generated support for continuing existing Local Plan policy (Option 1). The need to also support the tourist and visitor economy was also recognised. Additionally, one Parish advocated a mixed approach which would include increasing development in rural areas.
- 4.31 Parish responses in relation to the hierarchy of centres (question 18) indicated that Up Holland should remain a village centre and separate from Skelmersdale, and that additional village centres should be considered for inclusion.
- 4.32 In relation to healthy centres (question 19) the view expressed was that the policy approach to determining appropriate uses in town centres should be reviewed as should the Primary Shopping Area in Burscough (Options 3 and 2 respectively).
- 4.33 Question 20 (sites for town centre uses) generated most support for a concentration upon Skelmersdale and Ormskirk. A non-food retail warehouse park was viewed as beneficial by one parish as this would increase non-food expenditure retention for the Borough. Conversely, an opposing view was that no further sites were required.
- 4.34 Question 21 (general comments) generated a few responses from Parish Councils. It was noted:
- The Local Plan does not mention fracking which needed to be robustly resisted;
  - An acceptable funding regime was needed for the retention of threatened pumping stations which have a direct impact on drainage of agricultural land;
  - Negative impacts from surface water flooding upon the economy and transport infrastructure need to be addressed.

### **Feedback from Public Workshops**

- 4.35 At the six public workshops, several bespoke questions were used to generate discussion in relation to the Economy Policy Options; these relate to questions 15, 16, 17, 19 and 20. The open nature of discussions at these workshops also meant that additional general observations were made which are summarised below.

- 4.36 The following comments were made in relation to question 15, the allocation of land for employment development:
- There is a need to link housing to employment land so that people can work locally;
  - Skelmersdale and the M58 corridor have good transport links and are appropriate locations for large warehousing. More land needs to be allocated for these uses. The proposed rail link and station at Skelmersdale should include a freight terminal;
  - However, a converse view was that there was enough warehousing in the area, with a number of empty premises that should be adapted / sub-divided and that new warehouses in connection with Liverpool 2 were likely to be required further afield;
  - Warehousing would not be suitable in the rural Western Parishes;
  - Warehousing does not employ many people, and has little job progression;
  - There was a need for more business start-up units and smaller commercial units;
  - More interaction between Edge Hill University and businesses was needed;
  - There needed to be a range of businesses and more high tech jobs, with higher skills, particularly at Skelmersdale. There are few new premises;
  - The Council should consider forming a Development Company and developing a site for specialist business uses;
  - Sites for employment uses in the Northern Parishes need to be well-located in relation to the road network. There are current sites that are not well-located.
- 4.37 In terms of existing employment areas (question 16) the view was expressed that industrial estates need upgrading and modernising.
- 4.38 Question 17, the rural economy, generated the following comments:
- There needs to be more units provided in rural areas and more for rent;
  - There were concerns that mixed use residential / housing sites in rural areas had not come forward for business development (due to perceptions of viability);
  - Existing rural businesses, particularly SMEs, should be retained and encouraged.
- 4.39 In addition, other comments were made in relation to the Stimulating Economic Growth section of the Economy Issues and Options Paper as follows:
- More training opportunities were required to develop skills and education that can then retain local people;
  - Training and apprenticeships were required for the older workforce.
- 4.40 Ensuring healthy town, village and local centres (question 19) generated the following comments:
- The market should be allowed to dictate town centre uses;
  - The existing policy approach for Burscough town centre is appropriate;

- The general view was that village centres provided a useful function and should have commercial uses protected. Some had issues in terms of function and appearance e.g. Town Green Lane and Moss Green Lane. Local Centres in the Northern Parishes were considered to be losing services and Banks was in need of improvement;
- It was evident that each of the Borough's town centres had different issues, strengths and weaknesses e.g. it was suggested that Ormskirk needed a brand based upon being a tourist town with visitor attractions.

4.41 The following views were expressed in relation to question 20 (sites for town centre uses):

- Leakage of expenditure from the Borough to other centres must be accepted. Town centres have also been impacted by online shopping, parking restrictions, etc;
- New development should be focussed on Skelmersdale and greater diversity of uses are required, extending use into the evening;
- Conversely, town centre development should be spread around the Borough;
- However, it was noted that no redevelopment sites existed in Ormskirk and earlier developments had not improved pedestrian linkages;
- There was no need for more out of centre retail parks;
- The elderly have issues in terms of access to shops and services e.g. supermarkets;
- Main food shopping in the northern Parishes is undertaken outside the Borough but there are no sites for further retail development in Tarleton.

## 5. Representations on Environmental Policy Options

5.1 This chapter summarises the representations made on the questions relating to the Environmental Policy Options. The Environment Policy Options questions covered the following matters:

- The Local Nature Conservation Site designation
- Provision of renewable energy
- Sustainable design and construction in new development
- Creation of sustainable and healthy places for all
- Other environmental policy issues

### Feedback from Online Surveys / Written Representations

#### **22. Local Nature Conservation Sites**

*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?*

- *Option 1: Continue the Local Nature Conservation Sites designation into the next Local Plan*
- *Option 2: Remove the Local Nature Conservation Sites designation from the Local Plan and incorporate these sites within the Lancashire Ecological Network*

5.2 A total of 22 responses were received to this question from members of the public and other stakeholders. 9 of those who commented supported Option 1, whilst 7 expressed a preference for the alternative, Option 2.

5.3 Most of those who preferred Option 1 expressed concern that removal of this layer of sites would result in less protection for areas of nature conservation value in West Lancashire. One respondent expressed a wish for more Local Nature Conservation sites to be designated across the Borough.

5.4 Those who preferred Option 2 made the following points:

- Option 2 is a more realistic and sustainable way of protecting sites of local nature importance given the diminished resources of local authorities, natural environment charities and Natural England.
- This Option would allow concentration of effort on the development and maintenance of a robust and evidence-based Ecological Network based on regularly updated knowledge.
- This approach would also be more future-focussed and may offer a more flexible approach to the climatic, social and economic pressures and changes that will occur in the future.

- This Option offers an opportunity to promote a more holistic, joined-up way of protecting the environment which treats such sites as ‘links’ and would provide better connectivity for wildlife across the Borough.
  - Any successive policy related to the Ecological Network should be framed so as to give an effective and robust level of environmental protection across the Borough.
  - Further development could increase the chances of negative impacts on the Borough's Ecological Network and its functionality. In order to minimise such risks, Development Management policies should be provided which provide adequate protection for Ecological Networks, as well as for the whole hierarchy of designated wildlife sites and habitats and species of principal importance.
- 5.5 One respondent highlighted that the public accessibility and enjoyment value of Borough level sites could more appropriately be considered as part of West Lancashire’s Green Infrastructure Strategy and potentially be addressed within the Local Plan through a Green Infrastructure policy.

### **23. Provision of Renewable Energy**

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

- *Option 1: Designation of specific areas where the generation of wind energy, solar farms and other renewable energy technologies may be appropriate.*
- *Option 2: Consideration of applications for renewable energy infrastructure on a case-by-case basis.*

- 5.6 Of the 33 respondents who commented on this section, 9 supported Option 1, 5 supported Option 2, and one supported a hybrid of the two whereby areas are designated for renewable energy, but outside these areas renewable energy installations are considered on a case by case basis.
- 5.7 Those who supported Option 1 made the following points:
- Four expressed a preference for designating sites for solar farms based on the opinion that these have less of a visual and noise impact than wind turbines and that the land can still be used for grazing and/or other purposes;
  - Another supported shale gas extraction;
  - Option 1 was seen as the only option which would be certain to deliver renewable energy infrastructure through the planning process;
  - Another suggested that Option 1 would have the added advantage of providing clarity about the optimum siting for renewable energy sources.
  - Two saw Option 1 as potentially the most appropriate way of assessing the impact of providing renewable energy infrastructure upon wildlife and wildlife sites.



- There was a desire to see local communities involved in some way in such schemes and also to see an increased emphasis on increasing energy efficiency and eliminating wastefulness overall.
- 5.8 Those supporting Option 2 did so for a variety of reasons:
- Considering applications on a case-by-case basis would be the most effective in allowing local residents to have their say and assessing the individual impact of each technology.
  - New technologies may appear in the future which may not be appropriate for previously designated sites.
  - Two other respondents who felt strongly that much more should be done to encourage solar panels and wind turbines in existing industrial areas – particularly on large warehouses where large expanses of solar panels could be installed.
- 5.9 One respondent drew attention to a recent research report produced by Natural England entitled ‘Evidence review of the impact of solar farms on birds, bats and general ecology’ (NEER012). This early attempt to assess the impact of solar farms upon sensitive habitats and species highlights the need for further research into the potential interactions between wildlife and solar arrays.
- 5.10 More generally, two respondents raised the potential of harnessing tidal energy, highlighting the reliability of such a source. Another recommended consideration of the Lancashire Climate Change Strategy 2009-2027 which sets out the long-term vision for the whole county in relation to climate change adaptation.

#### **24. Sustainable Design and Construction in new development**

*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?*

- *Option 1: Require specific sustainable design and construction features or measures to be incorporated into new developments.*
- *Option 2: Do not require any specific sustainable design and construction features or measures to be required through planning policy.*
- *Option 3: Require applicants wishing to develop to contribute financially to a Community Energy Fund, managed by the Council which could be used to make other, existing properties more sustainable or to deliver renewable energy developments elsewhere.*

- 5.11 In all, 24 comments were received in relation to this question.
- 5.12 5 respondents favoured a mixture of Options 1 and 3, as this offered the opportunity to both influence new development and potentially improve existing stock through the suggested Community Energy Fund. One individual considered that Option 3 alone

would not be acceptable since a financial contribution “should not be the 'easy option' for the developer to avoid energy saving being incorporated in the design”.

- 5.13 6 favoured Option 1, supporting the principle that developers should be encouraged to build more sustainably and incorporate more renewable energy features and energy saving measures as standard. One respondent advocated the use of district energy schemes and renewable energy infrastructure (e.g. ground source heat pumps and air source heat pumps) particularly on larger development sites. One comment highlights the opportunities this option may present for significant restoration of biodiversity and climate change mitigation. Several expressed preferences for different forms of renewable energy, including solar roof tiles and solar panels.
- 5.14 5 supported Option 2, expressing concern that Option 1 could place unacceptable burdens on developers which may ultimately make the development unviable. One described such a policy as a “development tax”; another stated that such issues were sufficiently covered under Buildings Regulations changes. Concerns were also raised that it may not be appropriate to install sustainable design and construction features or measures on every site.
- 5.15 Two comments expressed concern about Option 3. One questioned the equity of a policy where those who contributed to such a fund did not benefit. The other suggested that the fund should recognise the fundamental variances in terms of housing market conditions and viability across the Borough. It was also felt that a financial obligation such as this should only be progressed in tandem with a review of the CIL Charging Schedule and that there should be a discretionary policy so that the planning benefits of any such obligations could be balanced against other planning benefits, e.g. the preservation or enhancement of heritage assets.

### **25. Creation of sustainable and healthy places**

*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 to create healthy and accessible environments for all? Which ones; why?*

- *Option 1: Require developments over a certain size to incorporate features that would encourage an active lifestyle for local residents and visitors.*
- *Option 2: Require developments over a certain size to include provision for direct connections from development into the wider cycling and walking infrastructure.*
- *Option 3: Require residential developments over a certain size to incorporate public open space and amenity green space.*

- 5.16 16 responses were received to this question:
- One respondent favoured Option 1;
  - 3 favoured Option 2, one stating the importance of creating connectivity between settlements in order to encourage greater use of means of transport other than the

car, which would produce multiple benefits for health and the environment. This individual also felt that the concept of the creation of Linear Parks across the Borough should be core to the Local Plan.

- One respondent supported Option 3, specifically mentioning the provision of safe and secure children’s play areas.
- 9 supported all three options, with one highlighting the fact that West Lancashire faces a number of challenges in relation to health and wellbeing and experiences significant inequalities.
- One respondent preferred a combination of Options 1 and 2;
- One preferred a combination of Options 2 and 3.
- One individual observed that each option has its pros and cons while another stated the importance of considering options available in relation to sustainable and ‘healthy’ design and layout on a case-by-case basis, taking into account the capacity of the site to accommodate features.

5.17 A number of issues surrounding the third option were raised, including the importance of ensuring any open / green space is designed and maintained in a way that also protects, maintains, enhances, expands and links the district's identified Ecological Networks. A call was made for ecological assessments of all significant developments, requiring designers to have regard to, and preferably retain, existing habitat features where practicable, and demonstrate how the proposal would enhance biodiversity and ensure links to the Ecological Network. Open space features should be an integral part of any development scheme and not “tucked away in a forgotten corner to be underutilised or vandalised”. A mix of careful planting would help to soften built environment and green space. One respondent suggested that this option should make provision to consider off-site provision in lieu of on-site provision.

5.18 Additional observations included:

- The flat nature of the West Lancashire landscape makes it ideal for cycling.
- Support of efforts to encourage increased activity levels due to the high levels of obesity in the North West region.
- A suggestion that more could be done to facilitate walking in the Borough – raising specifically the lack of pavements in some areas which discourages pedestrians.
- Support for housing near to employment sites which would provide people with the opportunity to walk or cycle to work, as well as for more safe routes which will encourage more children to walk to school. A further response recommended that community and road safety be considered, as the perception and fear of crime can discourage active travel and the use of green facilities for physical activity.

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

*This question requested further comments on any other environmental policy issues that should also be considered. This prompted a range of responses which also typically varied in scope and scale.*

- 5.19 Most comments received under this question related to more macro-scale issues which extend beyond the scope of a Local Plan, to sub-national or national level, but nonetheless can be influenced by actions at local level:
- Air quality and its impact upon human health which has recently risen up the political agenda.
  - One individual suggested that all developments should be encouraged to minimise emissions produced in their construction and use and also by associated transport movements.
  - Another expressed concern about the widespread use of pesticides and herbicides; in particular neonicotinoids which research suggests can have a particularly negative impact upon pollinating insects, for example bees.
- 5.20 One respondent provided detailed comments and submitted evidence in relation to flooding, specifically the impact of proposed closure of pumping stations in the Alt-Crossens catchment areas. The written evidence highlighted the impact of flooding upon infrastructure (such as road and rail) and also upon the wider environment (including on the behaviour and survival of certain species). The conclusion of the evidence submitted, in the view of the respondent, was that both flood resistance and resilience measures should be promoted as part of the planning process.
- 5.21 Although it is beyond the scope of the Local Plan, one response raised concern about the environmental impact of ‘fracking’ on local wildlife, water supply and general amenity in the Borough.
- 5.22 As outlined above, some comments in this section related to more local level issues which could be addressed through smaller scale actions. These included encouraging residents to cultivate gardens in such a way as to create wildlife habitats and to use rainwater for domestic purposes wherever possible, to create incentives for developers to include landscaping that encourages pollinating insects, or for agricultural businesses in the Northern Parishes to look into how green waste products may generate energy through an anaerobic digester.

**Feedback from West Lancashire Borough Council Members**

- 5.23 The value of biodiversity was discussed and recognised by Members. Beyond its intrinsic value, it was highlighted how important biodiversity is to tourism, particularly for popular sites such as Martin Mere.
- 5.24 However, some Members highlighted that some rural areas were like ‘barren landscapes’ in terms of nature and biodiversity, as in a number of cases intensive agriculture is harming wildlife.
- 5.25 Some Members specifically supported the Ecological Network approach to nature conservation as the way forward in terms of future provision for wildlife. All Members supported the suggestion that development could present an opportunity to increase biodiversity across the Borough. Some Members suggested that Green Infrastructure should be built around housing, improving connectivity between places; all Members specifically agreed that new development should link into the proposed and developing linear parks.
- 5.26 All Members recognised hedges and trees as important features and habitats within West Lancashire, and it was suggested these should take the place of walls in terms of boundary treatments where possible. Some Members supported the expansion of tree planting, suggesting the designation of sites for tree planting in the future. The value of tree planting for the absorption of surface water run-off and prevention of flooding in general was highlighted by some Members, as was the avoidance of excessive hardstanding within the garden areas and frontages of houses. In terms of sustainable design and construction, the re-use of grey water was raised as an issue which should be provided in new development.
- 5.27 Many Members articulated strongly that the Borough has a responsibility to deliver on its commitment with regards to renewable energy, with one even suggesting that the Borough should aim towards becoming self-sustaining. These same Members supported the idea that new housing should be warm and cheap to heat and suggested that renewable energy infrastructure should be located in the best / most appropriate places and also smaller scale infrastructure (e.g. solar panels) should be provided as part of new development. This aspect was also raised by other Members who supported the installation of solar panels on the roofs of factories as an ideal way of boosting renewable energy supply. Some Members indicated that they felt wind turbines were inappropriate in West Lancashire due to their visual impact upon the Green Belt.
- 5.28 All Members expressed the opinion that flood resilience is important within West Lancashire and that homes in particular need to be safe. Some Members suggested that it may be possible to build within Flood Zones, provided precautions were taken in terms of construction methods – for example potentially the use of ‘raft’ foundations. However, it was recognised that the engineering costs of designing out flooding could be significant.

- 5.29 Some Members stated that the Council should avoid homogenous development and encourage variety. It was suggested that perhaps some ‘quirky’ features which distinguish places and create a sense of distinct place could be embraced. This has been the case across the Borough in the past.

### **Feedback from Parish Councils**

- 5.30 Comments from the Parish Council Forum on environmental issues were based around flood risk, including the conflict and tension that exists in relation to development in Flood Zones. Concern was expressed that development should not take place in areas subject to a higher risk of flooding, but it was also recognised that without any development in Flood Zones 2 or 3, villages in the Borough may well suffer without any new build. A lack of new families in the area could result in villages ‘dying’, schools closing, etc.
- 5.31 Parish Councillors were keen to emphasise that flooding incidences cannot only be attributed to coastal and fluvial flooding, but are also due to drainage issues, surface water and problems with United Utilities’ (UU) infrastructure. Concern was expressed at the lack of existing procedure to rectify this. There was particular concern about the threat posed by pumps being turned off by the Environment Agency in the Alt-Crossens river catchment area and the impact this may have on future business investment decisions in the affected area.
- 5.32 Written comments on the Environmental Policy Options Paper were received from three Parish Councils.
- 5.33 In relation to local nature sites, two supported the continuation of the Local Nature Conservation Sites designation (Option 1) while the remaining one supported the removal of this designation and the incorporation of these sites within the Environmental Network (Option 2).
- 5.34 In relation to renewable energy generation, two Parish Councils supported the designation of specific areas for renewable energy infrastructure (Option 1) while one supported a combination of the two proposed options.
- 5.35 With regards to sustainable design and construction features or measures, two Parish Council responses favoured a combination of Option 1 and 3 which would see both the incorporation of sustainable design and construction features or measures on some sites with an additional policy requiring a contribution towards a central fund for sustainable construction and design. The other response favoured solely Option 3. An additional comment came from one Parish Council who felt that smaller developments should also be required to make some contribution towards features which would encourage an active lifestyle.

### Feedback from Public Workshops

- 5.36 The value of local nature sites was made clear at most of the public consultation workshops. The importance of large, designated sites of the Ribble Estuary and Martin Mere to nature and tourism was recognised by many, however local people also keenly highlighted a variety of smaller sites which they valued for a number of reasons. Some examples were Mere Sands Wood in Burscough and Beacon Park near Skelmersdale. These sites were valued for their own sake – for nature value – but also for their associated recreational value. For this reason, a number of people supported improved access to these and other sites. In the Northern Parishes the new path across Ribble Marshes was praised for opening up this area to visitors and local people alike. People in Skelmersdale in particular called for improved access for all to areas of the Tawd Valley.
- 5.37 Associated with this desire for improved access to green areas was a wish to see better use of underused or waste land for the benefit of local people – e.g. as allotments.
- 5.38 In relation to improving nature value in West Lancashire, concern was raised across a number of workshops about the negative impact of farming on biodiversity. Specific issues included the removal of hedgerows which provide valuable wildlife habitats. Most agreed that hedgerows should be given more protection.
- 5.39 A number of people appreciated the importance of wildlife corridors to species movement and survival. Some saw the potential of linking this concept to that of the proposed and developing linear parks across the Borough. The concept was recognised by many of those attending the workshops and viewed as having future potential. Some saw the provision of linear parks and as a means by which the impact of future development could be mitigated.
- 5.40 A clear message through many workshops was that consideration of the environment when providing new development is vitally important. There was a call for improvement of the environment when surrounding sites are developed, rather than it being forgotten or pushed to the bottom of a list of priorities. There was a consensus across most events that measures supporting biodiversity and improved habitats for wildlife should be built into new developments. These could include features such as bat bricks and bird nesting boxes or simply the retention of existing habitats or natural features such as groups of trees, ponds and hedges.
- 5.41 There was a general consensus that renewable energy was a positive means of supplying our energy needs. However there was a divide over which forms of renewable energy generation would be most effective and acceptable and the scale of the provision and concentration of such infrastructure. Some gave their support to any form of renewable energy, believing more should be done to encourage this ‘clean’ form of energy generation. This belief was often based upon the attitude that renewable energy infrastructure is at least reversible (even turbines), unlike other forms of generation such as nuclear. There was wider support for the inclusion of

turbines in more industrial areas. Several people who attended the Skelmersdale workshop claimed that they had become accustomed to the ‘Walker’s’ turbine since it had been installed. Others were more cautious about the impact of wind energy – especially the visual impacts of larger solar farms and wind turbines. In relation to solar farms, some saw little impact on the local environment since land can still be used for grazing and their installation is reversible. Those against were more fearful of losing valuable agricultural land.

- 5.42 There was more general support for the inclusion of renewable energy generation as part of new development – particularly solar panels on new housing or warehousing and retail developments. The latter was seen as having particular potential and least impact on people. There was suggestions at all of the events concerning new and emerging renewable energy technologies – e.g. solar roof tiles and Ground Source Heat Pumps as well as suggestions for more innovative solutions – e.g. harnessing tidal power and using former mine shafts for geothermal energy. Several people at two events felt that energy generated locally should benefit these local communities specifically. There was general consensus that new development should be as energy efficient as possible. Rising fuel costs were a particular concern in Skelmersdale. A number of people at this workshop expressed the view that new homes should be as cheap to heat as possible.
- 5.43 At the workshop events there was alarm almost universally expressed at the suggestion that the Council should consider permitting development on Flood Zones 2 or 3. Some individuals suggested that there could be some measures employed which may allow some development within these areas (e.g. raised floor levels) but there was some scepticism that this would provide an acceptable solution. Flooding from some source or another was raised as an issue of concern in all of the areas, but was particularly acutely felt in Burscough. There was an understanding in most cases that flooding was a complex and multifaceted issue but many of those attending felt strongly that it needed to be dealt with effectively as part of any future development. Suggestions for methods of doing this included the use of SUDS and more greenery in general in order to help in the natural absorption of water. A number of people recognised that there was a need to deal with water effectively within households through efforts such as water recycling.
- 5.44 In relation to the layout of new development there was some concern that there was not sufficient space within recent housing developments for the creation of a sufficiently green and pleasant environment. A number of people across several workshops claimed that many new housing estates included too much obvious hardstanding (generally tarmac). Along the same lines, out of a number of discussions emerged a preference for hedges rather than harder boundaries such as fences or walls. Wider ‘green’ boundaries, wildflower areas and open spaces were also seen as a means of accommodating more wildlife in and around these developments.



- 5.45 There was general support for improved links within and out of/in to new developments by foot or bike. A lack of suitable pavements in new estates was raised a number of times as this was felt to discourage pedestrians on safety grounds. An absence of signage and legible routes was highlighted as a particular issue in Skelmersdale which discourages walkers and cyclists. In terms of the provision of local green spaces, the importance of small local play spaces for children within residential areas was raised and suggested as an important way of providing children with an opportunity for exercise, so promoting healthier lifestyles.
- 5.46 There were a number of discussions around the design of new housing and many felt that in most cases the design of new homes was too ‘standard’, not distinctive enough and did not reflect the style of their individual locality.

#### **Other Feedback**

- 5.47 Although beyond the scope of the Local Plan, one Parish Council response raised concern about the environmental impact of ‘fracking’ on local wildlife, water supply and general amenity in the Borough.
- 5.48 A separate Parish Council comment raised the issue of air quality and queried the impact of tree and woodland schemes on improvements to air quality.

## 6. Representations on Social Policy Options

6.1 This chapter summarises the representations made on the questions relating to the Social Policy Options, which covered the following matters:

- Affordable housing
- Self and custom build housing
- Caravan and houseboat accommodation
- The Skelmersdale housing market
- Social requirements of older people
- Accommodation for older people
- Houses in multiple occupation
- Off-campus, purpose-built student accommodation
- Accommodation for Travellers

### Feedback from Online Surveys / Written Representations

#### **27. Affordable Housing**

*There are various policy options to deliver affordable housing ('AH'); several of these can be used together. The options are:*

- *Option 1: Do nothing, i.e. have no policy on AH*
- *Option 2: Continue with the usual 'percentage' approach to AH policy*
- *Option 3: Carry on with a broadly similar policy to policy RS2 of the current Local Plan with geographical and percentage variation between schemes*
- *Option 4: Add more detail to the Local Plan policy e.g. on house sizes and tenures*
- *Option 5: Allocate specific sites for 100% AH schemes*
- *Option 6: Allow AH in locations where general market housing would not be permitted*
- *Option 7: Allow for more flexibility when delivering AH as part of larger market housing developments*
- *Option 8: Have greater flexibility in what the Council defines as AH*

*Which option(s) for the approach towards AH policy do you think is (are) the most appropriate for West Lancashire? Why?*

6.2 A total of 26 responses were received to this question from members of the public and other stakeholders via the online surveys and paper representation forms. The eight options were not necessarily mutually exclusive, and responses favoured a variety of options, either single options or hybrids of several options, for example options 2-4, and / or 5-8. Option 1 received the least support (2 respondents); Options 2, 8 and 3 were the most popular (10, 8 and 7 'votes' respectively); Options 4, 5 and 7 had support from 6 respondents, and Option 6 had 5 respondents' support.

6.3 The comments made by representors included the following:

- 100% AH allocations need to have a high probability of being delivered;
- Steer away from creating 'sink estates' (i.e. mix AH with market housing);
- Greater weight should be given to schemes which meet the full AH requirements;
- It is important to have a robust evidence base to back up AH policies;
- Option 3: Any policy needs flexibility to apply during a long plan period;
- Option 8: There are many AH needs, the definition of AH should be broad;
- Off-site contributions via commuted sums should be considered;
- The Community Infrastructure Levy is undermining viability, thus also AH provision;
- Look not just at affordability but also quality, choice, type, tenure and size;
- There is a need for one policy for rented AH and another policy for AH for purchase.

**28 Demand for self- and custom-build housing**

*The options for self- and custom-build housing ('SCB housing') are as follow:*

- *Option 1: Do not allocate any sites for SCB housing*
- *Option 2: Set aside parts of larger allocated housing sites for SCB plots*
- *Option 3: Identify and allocate small sites for SCB dwellings in line with demand*

*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 build your own home? Why?*

6.4 18 responses were received to question 28, with 4 favouring Option 1, one favouring Option 2, and 6 favouring Option 3. One respondent was of the opinion that none of the options should be pursued, but that there should be flexibility in policy to allow for SCB housing if needed. The House Builders Federation advised that setting aside part of a large site for SCB housing could impact on the whole site's viability and delivery. Another respondent advised that SCB properties should be environmentally sustainable.

**29 : Demand for alternative residential accommodation**

*In terms of meeting the needs of caravan / houseboat dwellers, the options are:*

- *Option 1: Allow for caravan or houseboat accommodation to come forward as the market demands*
- *Option 2: Allocate new sites, or land on the edge of existing sites, for additional caravan-based accommodation or mooring berths.*
- *Option 3: Vary Green Belt policy on a site-specific basis, to allow for expansion or intensification of residential caravan sites or mooring berths to meet identified needs*

*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 houseboats? Why?*

- 6.5 18 comments were made on question 29, with five respondents favouring Option 1, four favouring Option 2, three favouring Option 3, and one favouring a mix of all three options. Several people were of the view that allowing these forms of accommodation would provide people with the opportunity to downsize, thereby freeing up market housing. There were varying opinions about whether or not to relax Green Belt policy to meet these needs. It was advised that, as canal boat occupiers require the facilities found at marinas, that their needs should be met on the edge of existing marinas.

**30 The Skelmersdale housing market**

*The options to address the issues relating to the Skelmersdale housing market are:*

- *Option 1: Continue to relax, or further relax policy requirements for housing sites in Skelmersdale*
- *Option 2: Base the Local Plan Review strategy on the regeneration and expansion of Skelmersdale*

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

- 6.6 With respect to addressing the relative underperformance in the Skelmersdale housing market, 31 responses were received. 10 expressed a preference for Option 2; 2 for Option 1, and at least 3 for a blend of the options. Various comments were made on the Skelmersdale market and associated issues, which can be summarised as follows:
- If Option 1 is pursued, environmental protection policies should not be relaxed, nor should open space policies, nor CIL where applicable (as infrastructure is needed), but affordable housing requirements can be further relaxed. Option 1 should include wider community benefits;
  - One needs to look not just at housing, but how infrastructure will be provided to create sustainable communities; policy in relation to infrastructure provision should

not be relaxed. One should also investigate providing incentives to develop, for example fast-track planning arrangements;

- Housing and employment investment around Skelmersdale can act as a ‘catalyst’ for regeneration within the town. Develop the ‘easier’ sites first, then once the town centre is delivered, develop housing within the town. The town centre needs to be more than a retail park. A range of housing is required for the town, including for second and third time buyers, to be integrated with jobs provided;
- Conversely, some expressed the view that recent policy has not worked and it is ‘time to move on to other areas’ or to ‘start from scratch’, that expanding a deprived area will make it worse, and that a strategy to focus development on the town will not deliver any significant or necessary levels of development.

### **31 The social requirements of older people**

*With respect to the ‘social needs’ of older people, the options are:*

- *Option 1: A general ‘sustainable development’ policy which directs new development to places where services and facilities are available*
- *Option 2: Allocate specific sites in appropriate locations for services and facilities.*
- *Option 3: Prepare an Area Action Plan or similar document to ensure facilities are provided as part of any very large new developments*

*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?*

6.7 29 stakeholders responded to this question, 10 expressing a preference for Option 1, two for Option 2, and two for Option 3, as well as one person opting for a combination of Options 1 and 2, and one opting for Option 1, backed up by 2 and 3.

6.8 Specific comments made on this topic are summarised thus:

- Accommodation needs to be integrated with the community and / or with new development; older people should not be ‘shipped off’, away from their homes and families; special developments only for older people carry a risk of ‘ghettoization’;
- Conversely, support was expressed by one respondent for a retirement village;
- It is important that health, transport and consumer facilities are readily available;
- There is no need for an elderly-specific sustainable development policy (Option 1), as sustainable development should run through the whole Local Plan;
- Option 3: a new approach is needed as there is an insufficient range of suitable types of development; specialist schemes tend to be exclusive;
- Whilst the objectives are supported, the Local Plan should not be prescriptive as to how these should be achieved;
- Liaison with the Lancashire County Council Public Health Team is recommended.

**32 Residential accommodation for older people**

*With respect to the accommodation requirements for older people, the options are:*

- *Option 1: Have no specific policy, but let the market deliver appropriate accommodation in line with local demand*
- *Option 2: Continue the current approach, i.e. require that a percentage of new dwellings be designed specifically to accommodate the elderly*
- *Option 3: In conjunction with the above, provide a tighter definition of what constitutes ‘housing designed specifically to accommodate the elderly’*
- *Option 4: Adopt one or both of the optional Technical Standards for new houses*
- *Option 5: Require adherence to, or at least that regard be had to, the HAPPi (Housing our Ageing Population: Panel for Innovation) Design Principles*
- *Option 6: Allocate specific sites for elderly accommodation*
- *Option 7: Adopt the more general policy approach of promoting ‘Lifetime Neighbourhoods’*

*Which policy option(s) for providing accommodation for older people would you therefore prefer?*

- 6.9 The options set out in question 32 are not mutually exclusive, so several of the overall 33 responses involved the choice of two or more options. Options 2, 5 and 7 received 7 ‘ticks’ each, followed by Options 6, 4, 1 and 3 with 6, 5, 4 and 3 ‘ticks’ respectively. Four other respondents expressed a preference for bungalows.
- 6.10 Several representors advised that older people’s needs vary between individuals and over time, and therefore the ways of meeting needs also vary considerably, requiring a ‘mix and match’ approach, rather than ‘one size fits all’. As a general principle, people want the right to choose whether to stay at home (independently, or with support) and when (or if) to move into specialist accommodation. The types of accommodation included sheltered or retirement housing, Extra Care, adaptable dwellings (satisfying Building Regulations M4(2) or M4(3)), and extra care villages. One developer suggested ‘downsizer units, made available to older people in the first instance.
- 6.11 Other comments included recommendations to liaise with LCC Public Health, and to follow the advice in the ‘Housing for Later Life: Planning Ahead for Specialist Housing for Older People’ toolkit and suggested policy wording. Two respondents opposed the application of Technical Standards, as well as the HAPPi principles, citing the Housing Standards Review which recommended minimising the application of standards, instead favouring a permissive policy which facilitates provision of suitable accommodation.

**33 Provision of Houses in Multiple Occupation (HMOs) in Ormskirk**

*In terms of future policy to address the issues relating to HMOs, the key options are:*

- *Option 1: Expand the 'Article 4 area' and the area to which the HMO percentage policy applies, to include neighbouring settlements*
- *Option 2: Revoke the Article 4 Direction and policy RS3, and have no policy*
- *Option 3: Decrease the HMO limit from current levels on all or specific streets to a lower percentage, potentially even down to 0%*
- *Option 4: Increase the HMO limit from current levels on all or specific streets to a higher percentage.*

*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?*

6.12 15 responses were received to question 33. 7 favoured Option 1, followed by 3 in favour of Option 2, and 2 in favour of Option 4. Specific points made were as follows:

- In preparing a new policy, it is necessary to know student accommodation supply and demand, and to have flexibility for the future if a long plan period is chosen;
- If HMO provision is restricted, the Council should ensure student accommodation needs are met some other way, taking account of the University's aspirations;
- Consider a student quarter in Skelmersdale, with good public transport links to the University.

**34 Provision of off-campus purpose-built student accommodation in Ormskirk**

*With regard to the provision of purpose built student accommodation, the options are:*

- *Option 1: Continue with the current policy approach of restricting off-campus purpose-built student accommodation unless strict criteria are met.*
- *Option 2: Relax policy to allow purpose-built student accommodation away from the University Campus.*
- *Option 3: Allocate specific sites for off-campus student accommodation, whilst restricting 'unplanned' developments elsewhere.*
- *Option 4: Tighten the current policy to severely, or entirely, restrict off-campus, purpose-built student accommodation.*

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

6.13 Of the 20 responses to this question, six favoured Option 1; six favoured Option 3; two favoured Option 2; and one favoured Option 4. Three respondents expressed the view that accommodation should be provided on campus as far as is possible. Edge Hill University's (EHU) agent advised that EHU remains committed to providing on-campus

accommodation, but would also like to explore building some units in Ormskirk centre. Two respondents expressed concern about the impact on town centre shops; another stated that students / graduate can have a positive effect on town centres. Other locations suggested for sites included ‘scrubland out of town’, Skelmersdale, land in low- or non-residential areas, and land released from the Green Belt. It was advised that regard be had to transport and access to basic services when choosing sites.

### **35 Delivering suitable accommodation for travellers**

*The options for providing traveller accommodation are:*

- *Option 1: Allow the travellers based at present in West Lancashire to stay on their (currently unauthorised) sites.*
- *Option 2: When allocating new sites for other development in the Borough, set aside part of those sites for travellers*
- *Option 3: Compulsory Purchase suitable sites in order to allocate them for Travellers*

*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?*

6.14 17 responses were provided to question 35. Option 1 was the most popular, with 7 ‘votes’; Option 3 had 4 ‘votes’ and Option 2 just a single vote.

- In terms of Option 1, one respondent suggested flood risk was not an issue, as caravans could be moved if floods were imminent. The Environment Agency, conversely, advised that allocating sites in Flood Zone 3 is contrary to the NPPF;
- For Option 2, the view was expressed that locating Travellers adjacent to housing would not work;
- For Option 3, CPO should only be used as a last resort if negotiation did not work;
- Any allocated sites should have a ‘contract’ that they be well maintained.

### **Feedback from West Lancashire Borough Council Members**

6.15 At their forum, Council Members discussed affordable housing, accommodation for the elderly, and provision for Travellers.

6.16 There were differing views between Members concerning affordable housing. Some held the view that the current policy should be continued, that there should be more social rented and / or Council housing, that sites should be allocated for 100% affordable housing schemes, including on Council-owned land, and that the use of commuted sums for off-site provision was not supported. Others considered that affordable housing distorts the market, which should be allowed to ‘run its course’, that there were plenty of cheap (i.e. affordable) properties in Skelmersdale, that there



should be no sites for 100% affordable housing schemes, but that affordable units should be ‘pepper-potted’ through developments.

- 6.17 All Members were of the view that the emphasis on viability was undermining the policy, and that there was no ‘one size fits all’ approach.
- 6.18 In terms of accommodation for the elderly, Members agreed there was a need for a policy, although it could be amended, for example by providing a tighter definition of ‘accommodation for the elderly’. There was consensus that there is no ‘one size fits all’ approach, that people generally would prefer to live in their own homes, rather than move to a care home (etc.), and that bungalows were desirable, but in short supply. There is also a short supply of suitable properties to enable older people to downsize, both privately and Council-owned. In terms of ‘institutions’, the view was expressed that large developments such as Brookside in Ormskirk are the way forward. It was recommended that good practice elsewhere be observed and emulated.
- 6.19 In relation to accommodation for Travellers, it was pointed out that there are different types of Travellers, and that seeking to accommodate them all on one site would not work. The question was asked whether there would be any harm in allowing existing Travellers to stay on the sites they currently occupy. Members considered that setting aside part of a site allocation for Travellers would be unlikely to be successful, and that compulsory purchase looked to most realistic option, with brownfield sites favoured over greenfield.

### **Feedback from Parish Councils**

- 6.20 Online representations on (a selection of) the Social Policy Options were made by 5 Parish Councils (Aughton, Burscough, Halsall, Lathom, Scarisbrick, Up Holland). As stated earlier, 8 Parish Councils (PCs) were represented at the forum, and in total, 10 different Parish Councils made comments on the Social Policy Options as part of the Issues and Options consultation.
- 6.21 Five PCs responded online to question 27 on affordable housing (AH); the matter was also discussed at the PC forum. The following comments were made:
- Small clusters of AH in rural settlements to meet local needs enable communities to remain intact (Options 5 and 6);
  - The current definition of AH is not fit for purpose (Option 8);
  - In the light of the local need for AH, housing schemes that include AH should be prioritised;
  - AH should be encouraged without being prescriptive as to the amount / type, to reflect the differing needs of different areas;
  - It is extremely important to create and retain housing within the reach of first time buyers, as well as those with special needs;

- There is a need for affordable housing to enable children who have grown up in a village to stay in the area, and that a good mix of types / tenures is important.
- 6.22 In terms of self and custom build (SCB) housing (question 28), four PCs responded. Two chose Option 3: Allocate sites for SCB housing; one chose a combination of Option 2: Have SCB plots on larger allocated sites, and Option 3. Burscough Parish Council (BPC) supported SCB housing as an opportunity to create something out of the ordinary.
- 6.23 For question 29: caravan and houseboat accommodation, three PCs gave views; one supported Option 1: Leave to the market; one supported Option 3: Vary Green Belt policy. BPC pointed out that these types of accommodation could provide low cost homes, but could lead to a loss of holiday homes, a growth area in the visitor economy. BPC expressed the view that there may be a need for a marina at Burscough.
- 6.24 Three PCs commented on the Skelmersdale housing market (question 30). Up Holland PC did not support Option 1: Relaxation of (developer contribution) policies in Skelmersdale, adding that market weakness provides housing for people on low incomes. BPC supported Option 2; Halsall PC supported both Options 1 and 2.
- 6.25 At the Parish Council forum, Parish Councillors made the following points about the ageing population:
- People want suitable accommodation in their local areas to enable them to downsize (and also accommodation for young people / families to ‘get onto the housing ladder’), rather than more large executive homes. The current trend of replacing bungalows with larger houses should be resisted;
  - We should provide for older people to stay in the settlement where they live;
  - There is a desire for bungalows, and for multi-occupancy facilities (spread around the Borough); a mix of ages helps community cohesion.
- 6.26 Three PCs commented online regarding policies for older people (questions 31 and 32). Halsall PC supported the allocation of specific sites for services and facilities; Burscough PC advised that old people generally have no wish to be segregated. In terms of accommodation, there was support for Option 2: Continue the current policy; Option 3: Provide a tighter definition of ‘accommodation for the elderly’; Option 4: Application of Technical Standards on accessibility; Option 6: Allocate sites for elderly (and affordable) accommodation; and Option 7: Promote ‘Lifetime Neighbourhoods’.
- 6.27 With regard to student accommodation (question 33), Burscough PC supported the expansion of the ‘Article 4 area’ (Option 1) for HMOs to Burscough; Halsall and Up Holland PCs also supported Option 1, although they did not specify any additional areas to which the Article 4 Direction would apply. For off-campus purpose-built accommodation, Halsall PC chose Option 2: Relax current policy, whereas Up Holland PC chose Option 1: Continue with the current policy.

- 6.28 The same three PCs responded to question 34 (Traveller accommodation). Halsall PC considered Option 1: Allow Travellers to remain on current sites to be the most optimal; Burscough and Up Holland PCs chose Option 3: Use of compulsory purchase powers.

### **Feedback from Public Workshops**

- 6.29 At the public workshops, social policy option questions were asked in relation to affordable housing, self and custom build housing, student accommodation, and housing and facilities for the elderly.
- 6.30 Eight recurring points were made with regard to affordable housing (AH):
- AH needs to be provided where there is infrastructure, facilities, and employment;
  - AH is needed in order to allow people to stay in the area where they grew up;
  - AH needs to be genuinely affordable; some AH products are expensive;
  - Factors such as Right to Buy have worsened the affordability situation;
  - It was asked whether the Council could build affordable properties for rent or sale;
  - There is a need for a mix of different types, sizes and tenures of affordable housing;
  - Cheaper accommodation exists in Skelmersdale. Some recommended that people should move there; others considered this was an unreasonable expectation;
  - There was a desire that the Council enforce AH percentages; the viability argument appears to undermine AH provision.
- 6.31 Self and custom build (SCB) housing was only discussed briefly, and only at two workshops. People were generally supportive of the concept, and considered that small sites should be allocated for SCB housing, maybe with land being provided at a discount or free of charge to encourage this type of housing.
- 6.32 Student accommodation was discussed only at the Ormskirk workshop. The main points raised were:
- Policy RS3 has made some impact, but 2-student properties ‘fall under its radar’ and can have a significant cumulative impact;
  - Some considered the HMO limit should be 0%; others considered 5% was reasonable;
  - Policy RS3 only takes into consideration HMOs on the same street. There can be impact from HMOs to the rear or side of a property on different streets; this should be taken into account when assessing HMO proposals;
  - There was a discussion as to the benefits or otherwise of students and the University in general. Negative effects included parking issues and students’ exemption from Council Tax; positive effects included expenditure in the town;
  - On-campus accommodation was generally preferred to off-campus; first years should all be accommodated on campus; this may ‘free up’ HMOs for general use.

6.33 The topic of accommodation for the elderly raised much interest at each workshop, the main points made being:

- People are active until old age; they want to retain their independence and stay in their houses, therefore adaptable properties are necessary;
- There is a need for suitable properties for people to downsize into, both affordable accommodation (which is considered to be lacking), and 'quality' units;
- Older people's housing needs to be located within easy reach of services and facilities and / or good public transport;
- Old people generally do not want to live within an 'enclave', but to be integrated with the wider community: on the whole, mixed communities were considered better, although there was some desire for quiet cul-de-sac type developments;
- There needs to be a mix of types of old people's housing, from adaptable 'standard' market houses, through bungalows (which received widespread support, and preference to multi-storey developments) to schemes with on-site care;
- There was also support for a mix of ages, combining old people's housing with affordable housing, and properties for first time buyers;
- As with affordable housing, there was a call for the Council to build accommodation for the elderly.

## 7. Representations on Spatial Portrait

- 7.1 This chapter provides an overview of the representations made on the questions relating to the Spatial Portrait (questions 4-6 of the online survey). The Spatial Portrait summarises the key data for the Borough and, from that evidence, purports to describe each of the different areas of the Borough and identify the key planning-related issues across West Lancashire.

### **4. Spatial Portrait**

*Is there any data or evidence available that we haven't referred to in the Spatial Portrait Paper? If so, can you provide us with it or tell us where we can access it?*

- 7.2 Representors agreed with most of the conclusions presented through the spatial portrait, particularly in relation to issues like the ageing population. Nonetheless, there were suggestions of data or evidence that could be included through future iterations.
- 7.3 It was considered that the Local Plan was correct in identifying the regeneration of Skelmersdale Town Centre as an important objective and suggested evidence should be collated to evidence the leakage of expenditure from Skelmersdale to other areas, the loss of high street retailers, and lost ground in the national retail rankings. This was to show that the Concourse needs protecting as per the current Policy SP.2.
- 7.4 Some felt that the data presented through the Spatial Portrait is inconsistent, particularly regarding Up Holland and Bickerstaffe where data on those areas is provided separately to Skelmersdale and at other times combined with Skelmersdale. It is considered that Up Holland and Bickerstaffe are different in character to Skelmersdale and should be treated separately. Summary statements cannot therefore accurately reflect the area as a whole.
- 7.5 There were complaints that there was no mention of fracking and the negative impacts it would have on tourism, agriculture and the environment. Halsall Parish Council provided links to evidence from USA research on the damage caused by fracking. Separate links were also provided to data on soil health, peat loss, and water level management in the Alt-Crossens catchment by the Lancashire Wildlife Trust.
- 7.6 There were demands for the results of the HEDNA and Liverpool City Region SHELMA to feature in later iterations of the Spatial Portrait. Some also wanted the Spatial Framework proposals of Greater Manchester and Liverpool, when adopted, to feature in the Portrait and CPRE (Campaign to Protect Rural England) provided links to evidence rebutting the need for extensive Green Belt release in those areas. Some respondents considered that cross-boundary issues should be emphasised more strongly – felt to be particularly important given West Lancashire's geographical proximity to larger urban areas and the Liverpool City Region.

- 7.7 One representor requested data be sought that identifies the percentages of pupils at primary and secondary levels travelling out of Skelmersdale to reach education, as they considered parents are choosing to send their children to schools outside the town.
- 7.8 Some representors felt that more emphasis should be given to the importance of agricultural and food production and its value to the local economy and provided links to BRES and ONS data sources.
- 7.9 There were requests for more local infrastructure studies – including road traffic assessments in the northern parishes. Burscough Parish Council offered evidence of flooding which they considered is not adequately covered in the evidence base.
- 7.10 Some representors stated that the Spatial Portrait made insufficient reference to the importance of buildings as heritage assets and buildings at risk. It was considered important to explain the contribution of the historic environment to the character of an area, its economic well-being and the quality of life of its communities.
- 7.11 Finally, others suggested that the evidence should include reference to playing pitch strategy and other health related strategies. The Council’s Economic Development Strategy (2015) should be included within the Spatial Portrait.

#### **5. Spatial Portrait (ii)**

*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?*

- 7.12 Most people concurred with the Spatial Portrait. However, a small number of comments made suggestions for improvement and minor corrections.
- 7.13 Some representors felt that the Portrait does not reflect all areas accurately – for example, analysis using ward boundaries merges deprived areas with affluent areas to blur evidence whilst Ormskirk and Aughton have been merged for administrative and political purposes which has resulted in the erosion of Aughton’s identity as a village in its own right. Similarly, some respondents considered that Up Holland should not be considered as part of Skelmersdale’s whole but be a separate entity geographically and culturally. It was felt that the inclusion of Bickerstaffe and Up Holland with Skelmersdale as a single coherent area does not facilitate easy analysis of data and statements do not apply across all areas; the data is too generalised.
- 7.14 There were calls that the Portrait should provide greater commentary on the linkages between West Lancashire and other local authority areas and communities. It was also considered that more should be made of green infrastructure and more said about the importance of agriculture and food production. Representors wished to emphasise the poor infrastructure in the northern parishes – including roads, low water pressure and often reduced bus services and health services. They also emphasised the need for development to support economic growth, sustain local services and facilities.

- 7.15 Representors said the Portrait alluded to the need for the regeneration of Skelmersdale town centre but did not adequately express the urgent requirement to deliver a credible evening economy and improve the town centre environment. Others felt that the Portrait should provide a description and assessment of the historic environment in the Borough and the contribution it makes in each area.
- 7.16 There were some minor corrections requested, including:
- Ravenhead brickworks is a SSSI for its geology rather than wildlife;
  - Correction within last sentence relating to Wrightington Bar Pasture SSSI and its biological importance;
  - Statement relating to the Borough having “the highest total areas of Wildlife Trust reserves in the county” should be corrected as it is incorrect.

### **6. Key Issues**

*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?*

- 7.17 Again, most respondents agreed that the Spatial Portrait identified the correct key issues for the Borough, including the need for affordable housing, sustainable development and the issues relating to an increasing, ageing population. Although it was proposed that the Portrait should explicitly acknowledge how issues interlink; for example, the link between the growth in ageing population and the decline in the working age population and how this impacts on the need to boost economic development.
- 7.18 Some respondents suggested that the enhancement of waterways and the prevention of fracking should be listed as issues. Some felt that the current Portrait only addresses international biodiversity issues, but should instead look spatially at ecology in strategic/wider landscape terms across the whole of the borough and into adjoining authorities and better integrate networks and green infrastructure. Other respondents suggested that the Council should consider the possibility of creating new garden/green villages which are currently being promoted by DCLG.
- 7.19 Some respondents suggested that a new issue should be ensuring that new development in Skelmersdale town centre does not result in the decline of the remainder of the town centre (Concourse). The completion of Skelmersdale Town Centre should be linked with the creation of an attractive, accessible Tawd Valley Park.
- 7.20 Respondents considered that the issue of safety, crime, community safety and reducing hospital admissions for violent crime should be addressed through the design of safe and accessible environments.

- 7.21 There was re-emphasis that education provision needs to be reviewed once housing sites have been determined and should therefore be an issue for consideration. Provision of employment opportunities and the provision of a support context to attract businesses (housing, training, attractive environment) should also be an important issue. Development opportunities should be maximised along the M58 corridor.
- 7.22 Some respondents considered greater consideration should be given to the public transport provision issues (including bus services, connectivity, Skelmersdale rail station proposals) and its interrelation with new development so as not to compound existing problems. It was also suggested that air quality management should be an issue to address.
- 7.23 Respondents suggested that the disparity between Skelmersdale and the remainder of the Borough needs to be stressed and addressed more effectively.
- 7.24 Respondents thought that cross-boundary issues and the role of West Lancashire in the Liverpool City Region should be given greater emphasis.
- 7.25 Respondents considered that the emerging Local Plan should ensure it encourages sustainable development, and reduces any impact on the environment locally, regionally, nationally and internationally, so that we can all live sustainably. As with the previous questions, respondents suggested that protecting agricultural land should be a key issue as it is of national, not just regional, importance. Others reminded that there is no mention of key heritage assets or the historic environment.



## 8. Duty to Co-operate

8.1 Ten organisations that are covered by the Duty to Co-operate, as well as a further three that are key stakeholders related to strategic and / or cross boundary issues, responded to the Local Plan Review: Issues & Options Consultation. Where these organisations made specific comments on individual issues, these have been covered in the relevant sections above. However, it is important to specifically identify the key Duty to Co-operate issues that have been raised by these organisations at this early stage of the Local Plan Review against the Strategic Priorities set out in NPPF paragraph 156. This section of the Consultation Feedback Report therefore identifies the key Duty to Co-operate Issues raised.

### Homes and Jobs

- 8.2 In general, the key issues that tend to be relevant to this NPPF Strategic Priority are those of the delivery of housing and employment opportunities, and issues that derive from the relationship between these two factors (such as commuting ratios). As such, the Council is seeking to address these key issues together through the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) but, given this assessment is still being prepared by the City Region Authorities (including West Lancashire Borough Council (WLBC)), some of the Council's neighbouring authorities have made comments on this issue.
- 8.3 Sefton Council have raised the potential issue that they may not be able to meet all of their long-term housing and employment land needs within Sefton and so WLBC may need to consider whether it can accommodate any of this long-term need. However, Sefton cannot quantify what this long-term need may be at the current time. Sefton also consider that, should WLBC seek to meet any of Sefton's longer-term needs, they should be accommodated as close as possible to Southport (the area within Sefton most constrained and unable to meet development needs). In addition, Sefton agrees that some of the City Region's need for large-scale B8 logistics development identified in the SHELMA could be met in WLBC, along the M58.
- 8.4 Knowsley Council have confirmed that they do not require WLBC to meet any of their development needs. St Helens Council have stated support for the identified Objectively-Assessed Need for WLBC and have stated their willingness to continue to work with WLBC as both the St Helens and the West Lancashire Local Plans are prepared to consider how each authority may help each other meet their objectively assessed development needs.
- 8.5 Another factor in the delivery of homes and jobs is the length of the Local Plan period, with the Council proposing two options – to 2037 or to 2050. Sefton and Knowsley have both expressed some concern about planning beyond 2037, but Lancashire County

Council (LCC) welcome the suggestion, as it could contribute to achieving wider strategic economic and regeneration objectives.

#### Retail, Leisure and other Commercial Development

- 8.6 LCC provided comments on the retail options discussed in the Economic Policy Options Paper, primarily in relation to seeking more sustainable and healthy living by reducing the need for car-based journeys.

#### Infrastructure

- 8.7 Sefton and St Helens Councils both made comments on the need for any development near to their boundaries to be planned with regard to cross-boundary impacts on infrastructure, particularly in relation to highways, public transport and education. LCC's School Planning Team also provided detailed comments on planning for education as part of the Local Plan Review in relation to how any increased demand for school places will be identified and accommodated, in particular the difficulties of calculating accurate pupil projections if the Local Plan were to cover a longer Plan period. LCC and Highways England both commented on the need to continue to work with the Council as the Local Plan Review progresses, to identify any impacts on the highways networks in and around WLBC.

#### Health, security, community and cultural infrastructure

- 8.8 Several organisations made general comments on the need to ensure appropriate provision of community and cultural infrastructure and to promote healthier lifestyles through the way places are planned, including LCC and Sport England. However, these issues, while important, are not necessarily relevant to the Duty to Co-operate as they are not cross-boundary issues for WLBC, but they have been considered against the relevant issues in the earlier sections of this report.

#### Climate change and natural and historic environment

- 8.9 As statutory consultees with responsibility for particular aspects of the natural and historic environment, Natural England, the Environment Agency and Historic England have all provided detailed comments on their respective areas of expertise, as have the Lancashire Wildlife Trust, and these have been considered against the relevant issues in the earlier sections of this report. However, with the exception of some localised drainage / flooding issues and some ecological issues (mainly covered by the Habitats Regulations Assessment), these issues are not cross-boundary issues and so are not wholly relevant to the Duty to Co-operate.

## Summary

- 8.10 Those organisations who are affected by the Duty to Co-operate and have responded to the Local Plan Review consultation have raised several relevant issues that will require further consideration and discussion. Most crucially, the on-going co-operation with neighbouring authorities on the provision of homes and jobs will shape the Local Plan Review and will, in turn, have impacts on infrastructure provision within WLBC and its neighbours, as well as having impacts on the environment which must be managed. As the preferred strategic development option is selected and specific sites identified for allocation to meet that preferred option, these issues will need to be considered further with the relevant Duty to Co-operate bodies and infrastructure providers.

## 9. Developers Forum

9.1 A total of 45 developers and / or agents attended the forum, held at WLBC offices on 20 March 2017. At the forum, a number of set questions were asked, relating to key issues, in order to generate discussion. The key issues, and the points made in response by the attendees, are set out below.

### 9.2 Key Issue 1: Why West Lancashire?

- West Lancashire is a missed opportunity – it enjoys a good position in the region, so can sustain a good level of housing and economic development;
- Market potential – the Borough has not fulfilled that potential because it is restricted by the Green Belt, despite being reasonable location-wise;
- Advantage of a University in Ormskirk;
- M58 Corridor – this has good opportunities for logistics operations with the Superport;
- The Borough enjoys good infrastructure, albeit with some shortfalls, e.g. no station at Skelmersdale;
- Eastern Parishes doesn't have enough population because the Green Belt is constraining it; the area is deteriorating;
- Opportunities exist for a new settlement option;
- House builders need some commitment from the Council to invest; investment is needed in Skelmersdale rail, Skelmersdale Town Centre, the West Lancashire Route Management Strategy, and in water-related infrastructure.

### 9.3 Key Issue 2: How much new development?

The Plan should go for higher numbers to:

- deliver economic growth and affordable housing need;
- take advantage of the Superport;
- satisfy NPPF which seeks positive opportunities for growth, as Cheshire East have done;
- let market decide – provide an over-supply to help deliver affordables and to provide range and choice – market will move to West Lancs if there is a boost to supply;
- plan for longer-term in order to plan properly and release GB in one go (so don't have to have GB debate each Local Plan);
- provide labour force to industrial areas (Knowsley Industrial Park works because residential areas on doorstep, Castleford another good example).

However, there is a limit to the market, a ceiling (though its value is unknown; this is a national issue) because of the limited number of housebuilders – this is even more so in Skelmersdale, so a broader selection of market locations is needed. Skelmersdale Rail is a game changer though and provides opportunities to make good new places in outlying areas of Skelmersdale to raise this ceiling.

#### 9.4 Key Issue 3: Where should we put new development?

(The question posed was the same as Issues and Options consultation question 11.)

- All 4 scenarios (reflect existing distribution, Key Service Centres, rural focus, Skelmersdale focus); don't concentrate on one area – all need to grow.
- Make use of previously developed sites on brownfield land in the Green Belt; have a more flexible policy for these.

#### 9.5 Key Issue 4: What kind of employment development is needed and where?

- The M58 Corridor is the best option, but this corridor needs to be defined.

#### 9.6 Key Issue 5: Do we need sites for retail and town centre uses?

- Skelmersdale needs more retail, so policy needs more flexibility to stop leakage of food spend elsewhere.
- Could also do with a non-food retail park.

#### 9.7 Key Issue 6: Specialist Housing

- Need a cross section of accommodation types across the sites collectively
- Industry is nervous about compartmentalising people
- Could elderly housing be exempt from the Community Infrastructure Levy?
- Provision of affordable housing is driven by Registered Providers
- The house building industry is embracing Starter Homes and is ready to deliver them
- Developers would welcome off-site delivery of affordable and specialist housing

## 10. Questionnaire work

10.1 This chapter provides a summary of the comments made during informal on-street questionnaires which were carried out over the course of 2-3 hours each in several locations. These locations comprised Skelmersdale Concourse Shopping Centre (Wednesday 19 April), Ormskirk Town Centre (Thursday 20 April), West Lancashire College, Skelmersdale Campus (Wednesday 19 April) and Edge Hill University (Wednesday 5 April). This form of consultation, and in these locations, was carried out in order to gain the opinions of those who would not generally participate in Local Plan consultations. The questionnaire was designed to be short, taking no more than five minutes to answer, and the questions were tailored to the specific location. The questions asked are set out below, and this is followed by a summary of each consultation event.

### **Edge Hill University**

- *What's the best thing about living in / studying in Ormskirk?*
- *What's the worst thing and what can we do about it?*
- *Would you consider living in Ormskirk or the surrounding area after you graduate?*
- *What would prevent you from doing this?*

### **West Lancashire College (Skelmersdale Campus)**

- *What's the best thing about (living in) Skelmersdale? [OR, if not from Skelmersdale] Why did you choose to come to West Lancs College?*
- *What is good about Skelmersdale?*
- *What would you do to improve Skelmersdale?*
- *Would you consider living in the area after you finish college? Why?*
- *What would stop you from choosing to live in the area?*

### **Ormskirk Town Centre/Skelmersdale Concourse Shopping Centre**

- *What's the best thing about living in / visiting [Ormskirk/Skelmersdale]?*
- *What is the worst thing about living in / visiting [Ormskirk/Skelmersdale] and what would you want the Council to do about it?*
- *Where should the Council try to focus new development in the future? (3 options: build as much as possible within the towns and villages; on the edge of towns and villages; or by creating new towns and villages).*
- *What sort of new housing do you think is needed in [Ormskirk / Skelmersdale] or wider West Lancs?*
- *What sort of business and job opportunities do you think that we need to attract to [Ormskirk / Skelmersdale] or wider West Lancs?*
- *What infrastructure improvements are needed in Ormskirk/ West Lancs?*

**Edge Hill University**

- 10.2 25 responses were collected in total from students at Edge Hill University. The majority of students spoken to had a positive view of Ormskirk as a town. Many of these cited the smaller, market town feel as something they valued. Some used the word ‘friendly’ to describe the town and many valued its good transport links, particularly to Liverpool City Centre. 16 of those asked thought that Ormskirk offered a reasonable range of shops which provided them with what they needed day-to-day.
- 10.3 Of those who responded to the question concerning negative aspects of the town, several expressed concern about the number of recent shop closures which had taken place in the main shopping area. Some cited the lack of things to do, particularly leisure facilities, as something they would like to see improved. A couple of responses specifically highlighted the lack of a cinema in the town, necessitating a journey to Southport. A similar number stated that it can be a confusing place to navigate by car due to the one-way system. Lack of parking was also raised by two students who travelled primarily by car to the University. A number of students living in the town itself, rather than on the University campus, expressed concern about the cost of student rental accommodation and the standard of these properties given the cost, for example there can be issues of noise in some locations.
- 10.4 The majority of students surveyed did not anticipate staying in Ormskirk / West Lancashire following graduation. Generally this was due to the ‘pull’ of their home town and family ties, rather than any local issues ‘pushing’ them away. However there was a general perception that the labour market in their home town / city offered more job opportunities. Three students felt that moving to a larger city such as Liverpool or Manchester would provide better job opportunities; a similar number had a specific employment sector in mind, or a location that would take them away from the area. One student expressed a desire to live and work abroad following graduation. However ten students (most of whom already lived relatively locally) wished to remain in the local area, if future employment offers allow. One trainee teacher stated that West Lancashire has a number of good local schools and would thus be an attractive location.

**West Lancashire College (Skelmersdale campus)**

- 10.5 Thirty six responses were gathered during the consultation of students in Skelmersdale. Twenty five of those interviewed were from the town itself with the remaining 11 travelling from elsewhere (mostly from within West Lancashire). Around eight Skelmersdale residents interviewed did not like living in the area and did not highlight any positive aspects of living there. However the remaining students mentioned some positive features of the town which included the College, the availability of shops and a green environment in which to live. Two students stated that they lived in a quiet area which is something that they valued.
- 10.6 A number of suggestions were made by students concerning improvements that could be made to the town. The overwhelming complaint was that there was not enough to

do in the Town Centre of an evening. Students cited a lack of restaurants, cinemas, pubs and other leisure activities. Several supported the idea of a train station opening in Skelmersdale. 13 made comments in relation to infrastructure including roads, parks and signage, complaining that these were poor and deteriorating. Three also would like to see better sporting facilities provided in the town, whilst others are keen to see a better range of shops provided within Skelmersdale.

- 10.7 Despite this, most of the students interviewed expressed a desire to continue living in Skelmersdale after finishing at College. This was generally due to family connections or ties within the town, although some cited the availability of housing as a reason for staying. Amongst the reasons for wanting to leave was the presence of gangs in the area and the feeling that it was not safe or desirable to go out of an evening and there was no real destination to visit in the Town Centre.

### ***Ormskirk Town Centre***

- 10.8 A total of 30 people were interviewed in Ormskirk Town Centre on market day. Those commenting commonly valued its character as a small ‘friendly’ market town with a reasonable range of shops and good public transport connections to other areas of Lancashire and Merseyside.
- 10.9 Negative issues raised by respondents typically concerned the number of town centre shops that had recently closed. Some considered the area was declining, particularly the range of shops. Four people felt that there were too many student properties in what is a small town, impacting negatively on the local environment and mix of people living there. One resident identified a lack of facilities for those with young children – i.e. shops for baby clothes, a Children’s Centre or adequate play and nursery facilities.
- 10.10 When consulted on the location of future development in Ormskirk, five people felt that the town centre was already too crowded in terms of development, and that there were insufficient brownfield sites left to develop upon. These people also expressed concern that any green sites should be considered for housing as they valued local parks and green areas within the town.
- 10.11 In relation to the types of new housing that should be provided, over half of those who commented highlighted a lack of first time buyer and/or affordable homes. Many felt this section of the market had been ‘taken over’ and used as student homes.
- 10.12 When asked about employment and business and job opportunities, some felt that there was a lack of support and accommodation for small, independent shops and businesses in the town. Two people suggested that more employment space could be established on the outskirts of the town or near the motorway, but others considered that large scale employment was probably inappropriate for a town of Ormskirk’s size.
- 10.13 Responses in relation to infrastructure improvements focussed around traffic congestion and parking with thirteen people raising this issue.



### ***Skelmersdale Concourse Shopping Centre***

- 10.14 Sixteen responses were received during an on-street questionnaire session in the Concourse Shopping Centre. Three people interviewed picked out the sense of community and the people in their neighbourhoods as what they valued about Skelmersdale. A similar number liked the green surroundings of the housing estates and the fact that the town was surrounded by countryside. However in contrast, three people stated that they didn't enjoy living in the area and were looking to move out. A small number of people interviewed were not Skelmersdale residents but had travelled to the Concourse to use the shops and appreciated these facilities and the availability of free parking.
- 10.15 Seven people when asked what improvements should be made to the area responded that there was little to do of an evening in the town, specifically mentioning a lack of bars and restaurants. This linked into the observation by several people that there was a poor range and choice of shops in the Concourse and a number perceived this as getting worse.
- 10.16 There was a mix of responses when people were asked where new development should be located. Only one person supported the development of underused green spaces, one suggested density of development could be increased while two felt that building on the edge of the town was preferable.
- 10.17 Again, a mix of responses was received in response to the question about the sort of housing that people felt would be required in the future. Most people suggested this needed to be 'affordable' and three stated that more family homes were required. A similar number claimed that there was a need for more bungalows and housing specifically for older people. Three people expressed a wish to see more energy efficient homes that were cheap to heat and run, highlighting the incidence of fuel poverty in the area.
- 10.18 In relation to employment provision, people gave many different responses. Many felt that a flexible approach was necessary to attract any business willing to invest in the area. There was some concern expressed by three people that skills should match the jobs available in the local area. One person suggested that providing a better evening offer in terms of entertainment could improve job opportunities – for example in the restaurant sector.
- 10.19 By far the most common response to the question concerning infrastructure requirements in Skelmersdale was that the town needs a railway station. Almost everyone questioned raised this topic. One person suggested that there was a need for better sports facilities which can be used by all, but particularly young people.

## 11. Representations on other matters

11.1 In addition to the 37 consultation questions relating to the content of the four Options Papers and the Spatial Portrait, comments were invited or permitted on other supporting and / or evidence base documents, including the Strategic Flood Risk Assessment Level 1, the Strategic Housing and Employment Land Availability Assessment, the Infrastructure Delivery Plan, and the Sustainability Appraisal. The comments received, as well as general comments not included elsewhere in this report, are summarised below.

### Strategic Flood Risk Assessment (Level 1)

11.2 There were 8 responses to the Issues and Options public consultation that are of relevance to the draft Strategic Flood Risk Assessment Level 1 (February 2017) which provides evidence to inform the emerging Local Plan. Five responses were from members of the public, two from Parish Councils and one from the Environment Agency. Those responses can be summarised as follows:

- Rufford, Halsall and Burscough were considered to be areas at risk of local flooding. Drainage was considered as being inadequate in Burscough and concerns were expressed in relation to the impact of new development on surface water flooding and flooding from sewers;
- The potential closure of pumping stations in the Alt-Crossens catchment area would adversely affect agriculture, the wider economy, infrastructure and housing.
- Evidence of flooding is available that has not been adequately covered by the evidence base. (NB Paragraph 7.1 of the draft SFRA indicates what official sources of flooding are taken into account in the document);
- Whilst the SFRA is a very thorough review it takes no account of increased future risk from flooding due to climate change. Extreme caution should be applied to increasing development in high flood risk zones and the Local Plan should consider the lifetime of housing development. Improved data may come to light during the lifetime of the Plan;
- There will be a significant reduction in EA maintenance in the Alt-Crossens catchment, withdrawing land drainage operations, and creating uncertainty. This requires specific attention in the Local Plan and for the Council to fully engage with partners. The increase in ground saturation and rising groundwater levels will be a major issue with off-site flooding likely to become increasingly relevant.

11.3 In addition, a comment was received at the Rural East Public Workshop that the draft SFRA also needed to take topography into account.

- 11.4 Finally, the representation from the Environment Agency made several detailed comments for amendment of the SFRA, including:
- Ormskirk is a high flood risk area. Add a comment about the interaction between the older drainage systems and Sandy Brook;
  - Parbold should be added as an area at risk from flooding. There are no flood defences in the vicinity of Parbold;
  - The SFRA should define Flood Zone 3b (functional floodplain);
  - Commentary relating to flood risk management systems (part of section 8) should be removed. The diversion of Calico Brook into East Quarry at Appley Bridge has ceased.

### **Strategic Housing and Employment Land Availability Assessment (SHELAA)**

- 11.5 A ‘Call for Sites’ exercise was carried out seeking suggestions for suitable sites for housing, employment, and other land uses, as part of the Local Plan Issues and Options Consultation. People were also given the opportunity to comment on the methodology and findings of the Draft Strategic Housing and Employment Land Availability Assessment (‘SHELAA’).
- 11.6 This ‘Call for Sites’ and consultation was extended to those on the Council’s Local Plan Consultation Database, and also to people who owned, or who had submitted sites for the SHELAA in previous ‘Calls for Sites’. Information requested included:
- Site specification – size, current uses, planning history
  - Proposed uses – indication of capacity and potential timeframe for delivery
  - Other information, e.g. on known constraints, viability.
- 11.7 The 2017 Call for Sites yielded a total of 15 new sites – 7 for housing only, 1 for employment only, and 7 for mixed uses including employment.
- 11.8 The consultation on the Draft SHELAA also generated 42 responses in relation to existing sites. These responses tended to involve the submission of additional details on sites, including timescales for anticipated delivery, and supporting information e.g. topographical surveys. However, much of the material received simply reiterated information already contained within the existing site submission forms.
- 11.9 The above submissions will be incorporated into the 2017 SHELAA, and will be reflected in the final 2017 SHELAA report which will be published later in the year, and will inform the next stage of the West Lancashire Local Plan Review.

### **Sustainability Appraisal**

- 11.10 No specific representations were received on the Sustainability Appraisal (SA) *per se*, although it was mentioned in two representations: one representor simply repeated national policy and Regulations in stating that SA needs to be undertaken and that it

should inform the Local Plan strategy; Lancashire County Council referred to the SA in their comments on several Options questions:

- Key Issues (question 6) – acknowledges that hospital admissions for violent crime is listed as an indicator in the SA; this should influence urban design considerations;
- Location of development (question 13): LCC agrees with the SA's conclusion that Options 1 and 2 are the most sustainable;
- Infrastructure (question 14): the SA includes an indicator on numbers killed or seriously injured on roads; this should be reflected in the Plan, with highway safety being a key area for consideration in the Preferred Options paper;
- Healthy town centres (question 19): the SA concludes that Option 3 is likely to be the most sustainable; consideration should be given to policies that contribute to healthy town centres to address specific health inequalities;
- Affordable housing (question 27): it is noted that in the SA, Option 4 (detailed AH policy) and Option 8 (flexibility in the definition of AH) perform well relative to the baseline.

### **Habitats Regulations Assessment**

11.11 A representation was received from Natural England which agreed that the spatial options were insufficiently developed to accurately predict potential effects upon European designated sites. They expressed a desire to discuss evidence that will be needed on which to base an effective Habitats Regulations Assessment as the Local Plan progresses.

### **Other (General) Comments**

11.12 Various other comments were made during the consultation, not directly relating to any specific Issue and Options question, or supporting document, but of relevance to the plan-making process, including:

- Consideration should be given to policy options to facilitate healthy lifestyles;
- Concern was raised about the possibility of hydraulic fracturing ('fracking') in West Lancashire. *(Note: this matter is beyond the remit of the West Lancashire Local Plan Review, but comes under the authority of Lancashire County Council, as Minerals and Waste Planning Authority.)*
- Burscough Parish Council requested that comments made by individuals be given equal weight to comments made by agents on behalf of landowners or developers. *(Note: West Lancashire Borough Council has always attached equal weight to comments received from all respondents and will continue to do so.)*
- One member of the public expressed the view that the Equality Impact Assessment for the Local Plan Review Issues and Options Cabinet Report was inadequate, and that more attention needs to be paid to those with protected characteristics, for example people with a disability.

## 12. Conclusions

- 12.1 A total of 113 representations were received on the Local Plan Review Issues and Options consultation, from a range of different stakeholders (statutory consultees, Parish Councils, residents' groups, individuals, organisations, developers, landowners and agents) covering a very wide variety of topics. 15 further representations were received on the Scope of the Local Plan Review.
- 12.2 A total of 138 people (excluding Council officers) attended the six consultation workshops around the Borough. 24 West Lancashire Borough Councillors and 12 Parish Councillors attended their respective forums. 45 developers and / or agents attended the Developers' Forum, and 8 neighbouring authorities attended the Duty to Co-Operate meeting hosted by the Council.
- 12.3 It is not surprising, given the nature of the questions asked, and the range of respondents, that the answers received to the different questions varied significantly between different stakeholders, and often between different areas of the Borough. Given the number of questions asked (over 35) and the range of views, this concluding chapter of the Consultation Feedback Report will not attempt to provide an overall summary of the representations received and reported in earlier chapters.
- 12.4 In due course, the Council will respond where appropriate, in a separate report, to points made in the representations on the Local Plan Review Issues and Options consultation, in line with the requirements of the West Lancashire Statement of Community Involvement (SCI). As stated in the SCI, the Council is not bound to respond to each individual submission / representation to the consultation.
- 12.5 The full set of representations can be viewed on the Council's website:  
<http://www.westlancs.gov.uk/planning/planning-policy/the-local-plan/local-plan-review.aspx>
- 12.6 The next stage of preparation of the Local Plan Review will be the Preferred Options stage, in which the preferred strategy for the future development of West Lancashire will be set out. It is envisaged that consultation on the Local Plan Review Preferred Options document will take place in summer 2018.

*This page is intentionally left blank (formatted for double-sided printing)*

## Appendix 1 Consultation Questions

The 37 consultation questions on the Local Plan Review – Issues and Options documents are as follows:

---

1-3. (Personal details – name, address, etc. Do you wish to be added to our consultation database?)

---

### 4. Spatial Portrait

The accompanying [Spatial Portrait Paper](#) considers how the Borough is currently functioning in economic, social and environmental terms, looking at key indicators and data to identify issues that the Borough is facing and assessing the physical nature of the Borough, be that in terms of the natural environment, built environment or infrastructure provision. It identifies a series of issues for each part of the Borough that the Local Plan should seek to address but also pinpoints several key issues which affect the whole, or most of, the Borough.

**Is there any data or evidence available that we haven't referred to in the Spatial Portrait Paper?  
If so, can you provide us with it or tell us where we can access it?**

---

**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?**

---

**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?**

---

### 7. A draft Vision for West Lancashire

The **Vision** is what the Council would like to see achieved for West Lancashire, based on the current evidence available.

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.

**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?**

---

## **8. Objectives**

**Objectives** set out how the **Vision** will be delivered. They are important in guiding what the planning policies should aim to achieve, and in monitoring whether the policies are working successfully after the Local Plan is adopted.

**The draft Objectives are:**

Objective 1: Sustainable Communities

Objective 2: A Healthy Population

Objective 3: A high quality built environment

Objective 4: Addressing climate change

Objective 5: Reduced inequality

Objective 6: The right mix of housing

Objective 7: A vitalized economy

Objective 8: Vibrant town and village centres

Objective 9: Accessible services

Objective 10: A natural environment

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

---

## **9. Strategic Development Options**

### **The 3 variables**

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

### **The amount of development land required**

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

\*One hectare (ha) is about the size of one and a half football pitches.

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



## 10. The Local Plan Period

We are considering two time periods for the Local Plan, both of which have a base date of 2012 to match the base data of the SHELMA\* and the current Local Plan.

\*The SHELMA (Strategic Housing and Employment Land Market Assessment) is an important study we are undertaking with neighbouring Merseyside councils to work out our future housing and employment land needs.

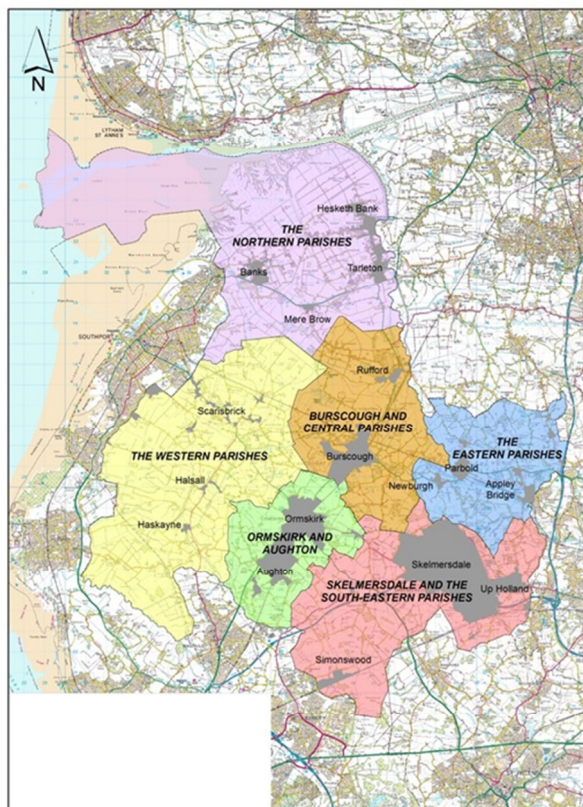
**The options are:**

- Option I - 2012 to 2037
- Option II - 2012 to 2050

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

---

## 11. Distributing the development requirements across West Lancashire



© Crown Copyright. All Rights Reserved.  
Licence No. 100024309. West Lancashire Borough Council. 2016.

1:150,000

A further consideration for the Strategic Development Options is the way the total amount of development land required is spread across the Borough. Whichever way the Borough is sub-divided, there will always be imperfect fits, as administrative boundaries never fully reflect the way the real world works, but we think the following Spatial Areas are more appropriate.

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

12. In terms of the distribution of new development between these new areas, we have identified four realistic potential scenarios that we might wish to take forward.

**The options are:**

- Scenario 1: Spread new development around West Lancashire according to the proportionate size of existing towns and villages.
- Scenario 2: Focus new development in and around the key service centres\* of Skelmersdale, Ormskirk and Burscough
- Scenario 3: Allocate less development to the key service centres and more to the rural areas such as the Northern Parishes.
- Scenario 4: Focus development on Skelmersdale; grow Skelmersdale significantly more than the other key service centres.

\*Key service centres (such as Ormskirk and Burscough) are those centres that have a good range of retail and service provision that can meet day to day needs, particularly for convenience (food) shopping. They will also have a primary school, secondary school, local employment, GP surgery, playing fields/areas and regular public transport services. A full explanation of the different types of centres can be found in the '[Sustainable Settlement Study](#)'.

**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 any way?**

---

### **13. The location of new development**

The previous question asks how we should spread development across West Lancashire. But we also need to think about where new development should go in relation to what exists at present. For example, should we try and fit new development within existing settlements, or put it in the countryside?

**The options are:**

- Option 1: Maximise the capacity of existing settlements by prioritising infill developments within built-up areas or by building higher.
- Option 2: Locate new development adjacent to existing settlements to reduce the need to travel and reduce emissions.
- Option 3: Create brand new settlements with the necessary associated infrastructure.
- Option 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).

\* Flood zones are mapped by the Environment Agency and refer to the likelihood of river and sea flooding, ignoring the presence of any defences. Flood zone 2 is a medium chance of flooding (or the chance of flooding once in every 100 or 200 years). Flood zone 3 is a high chance of flooding (or the chance of flooding more than once in every 100 years). There are no critical drainage areas in West Lancashire at present.

**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?**

---

### **14. Providing infrastructure and services**

Identifying what infrastructure and services will be required to support a new Local Plan will depend upon which strategic development options are ultimately selected and which sites are allocated to meet the Local Plan requirements. However, infrastructure is still a key issue that we must consider at this early stage of plan preparation. The different options for the amount of new development, and the whereabouts in the Borough it should go, all have their own implications for infrastructure and services provision.

**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?**

---

### **15. Economic Policy Issue 1: Providing the right scale, mix and distribution of employment land**

We need to contribute towards sustainable national economic growth. This includes providing the right size and mix of employment sites, better connecting Lancashire, supporting the rural and visitor economy and improving knowledge and skills. It places particular focus upon Skelmersdale. We need to consider how much future development should take place, where it should be, what type of development, which specific areas need to be regenerated, how business can be supported and how local communities can benefit.

**The options are:**

- Option 1: Allocate sites specifically for strategic distribution and warehousing needs
- Option 2: Allocate sites to encourage geographical clusters of specialist employment uses
- Option 3: Allocate all new sites for a range of 'B class' uses\*
- Option 4: Increase town centre office sites

\*Class B of the Town and Country Planning Use Classes Order (1987). This includes uses such as business and light industry (Class B1), general industry (B2), and warehousing (B8).

**Which policy option or options above for how we should allocate 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 is it?**

---

## 16. Economic Policy Issue 2: Existing Employment Areas

The following options consider how we should treat existing employment areas.

### **The options are:**

- Option 1: Continue with the existing Local Plan policy approach - i.e. protect employment uses on the most important sites; allow for other uses in certain situations on other sites
- Option 2: Protect all existing employment areas for business class employment uses
- Option 3: Designate selected employment areas either wholly or in part for non-business class uses
- Option 4: Do not protect employment areas for Class B1, B2 and B8 uses\*

\*Class B of the **Town** and Country Planning Use Classes Order (1987). This includes uses such as business and light industry (Class B1), general industry (B2), and warehousing (B8).

**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? If so, what is it?**

---

## 17. Economic Policy Issue 3: Spreading economic opportunities by supporting the rural economy

National policy requires local authorities to support the growth of business in rural areas, promote development and diversification of agriculture, and support sustainable rural tourism and leisure developments. Providing these rural economic opportunities raises multiple and potentially complex issues. The policy options below may either form a single future policy or a number of future policies.

### **The options are:**

- Option 1: Continue with existing Local Plan Policy approach
- Option 2: Increased development in rural areas
- Option 3: A tourism and visitor economy policy

**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?**

---

## 18. Economic Policy Issue 4: Network and hierarchy of centres

The Local Plan establishes a hierarchy of centres within the Borough:- town centres, large village centres and small village centres and local centres. This hierarchy is designed to provide a framework for the type and levels of development that will be appropriate for each of those centres.

### **The options are:**

- Review the Local Plan centre hierarchy

There are no other reasonable policy options in relation to this issue.

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

---

## 19. Economic Policy Issue 5: Ensuring healthy town, village and local centres - appropriate uses

Town centres are often the heart of a community and we want to support them. We need to consider whether the existing town centres and primary shopping areas\* are still appropriate and what uses should be allowed within them.

\*Primary shopping areas are the areas of town or village centres where shops are concentrated. Other parts of the town centre may have leisure (restaurants, cafes, bars) or business (offices etc) uses so we use the term 'primary shopping area' to identify the main retail area.

### **The options are:**

- Option 1: Review current town, village and local centre boundaries
- Option 2: Review current primary shopping area boundaries
- Option 3: Review what we consider to be appropriate uses in town centres

**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?**

---

## 20. Economic Policy Issue 6: Sites for town centre uses

**Town centre uses are those that you'd typically expect to see in your town centre - things like shops, cafes, bars, restaurants and offices.**

We need to make sure that there are enough sites in our town and village centres to be able to accommodate any identified needs for town centre uses. This will allow centres to grow sustainably, meet residents' needs and retain spending within the Borough.

### ***The options are:***

- Option 1: Continue our current approach - make Skelmersdale town centre the priority for investment
- Option 2: Allocate site(s) for town centre uses at Ormskirk
- Option 3: Allocate a non-town centre site somewhere in the Borough for a retail warehouse park.
- Option 4: Allocate a site to meet retail needs in the north of the Borough

**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 most appropriate and why? Is there an alternative option that you think is appropriate that has not been considered? If so, what is it?**

---

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

---

## 22. Environmental Policy Issue 1: Local Nature Conservation Sites

There are many levels of protection given to different nature conservation sites. One of the lower levels is called 'Local Nature Conservation Sites'. However, there is some concern that these sites no longer accurately reflect areas that are important to biodiversity and new and alternative assessments could be used to categorise and identify sites. National planning policy refers to the establishment of 'ecological networks' - looking at links between different sites and how improvements can be made to support nature conservation. We need to consider whether to keep the 'Local Nature Conservation Sites' designation, or to base our future policy approach on ecological networks.

### ***The options are:***

- Option 1: Continue with the Local Nature Conservation Sites\* designation in the next Local Plan
- Option 2: Remove the Local Nature Conservation Sites designation from the Local Plan. The sites would instead be incorporated into the Ecological Network\*\* and given appropriate protection.

\* Local Nature Conservation Sites are designated by local authorities as areas of locally important nature and landscape

\*\* Ecological Networks are the basic, joined up infrastructure of existing and future habitat needed to allow population of species and habitats to survive in changing conditions.

**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?**

---

## 23. Environmental Policy Issue 2: Renewable Energy

Planning can play an important role in reducing greenhouse gas emissions, providing resilience to climate change, and delivering renewable energy\*. It is important to consider how the Local Plan should encourage the provision of renewable energy in West Lancashire.

\*Renewable energy is energy collected from renewable sources - i.e. that which can be generated and replaced in short timescales. It includes solar panels and wind turbines.

### ***The options are:***

- Option 1: Designate specific areas where the generation of wind energy, solar farms and any other renewable energy technologies may be appropriate.
- Option 2: Do not designate any specific areas for renewable energy technologies, but consider any applications for the development of such technologies on a case-by-case basis.

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

#### 24. Environmental Policy Issue 3: Sustainable Design and Construction

The way that buildings are designed and constructed can help to reduce the effects of climate change by reducing demands on energy - for example through insulation, electric vehicle charging points and use of sustainable materials. Design can also help protect and promote biodiversity - for example by providing habitats for wildlife (bird boxes, bat bricks, hedgehog friendly fencing).

**The options are:**

- Require specific sustainable design and construction features or measures to be incorporated into new developments.
- Do not require any specific features or measures through policy.
- Require new development to contribute financially to a Community Energy Fund\*.

\*The **Community** Energy Fund would require certain new developments to pay the Council money, and that money would then be used to make existing properties more sustainable or to deliver renewable energy developments. This would help reduce the impact of development.

**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?**

---

#### 25. Environmental Policy Issue 4: Sustainable and Healthy Places

There are obviously lots of factors that influence health, although planning plays a significant role. The layout of new developments can contribute to encouraging exercise, improving connectivity, and reducing car usage, improving air quality, and improving the attractiveness of the area to enhance mental health and help people with dementia-related issues navigate their way around the area. Whilst the Borough has many areas of green spaces, there are shortages in certain types of open space and sports facilities and access to them.

**The options are:**

- Option 1: Require developments over a certain size to incorporate features that encourage an active lifestyle for local residents and visitors
- Option 2: Require developments over a certain size to provide direct connections from the development to the wider cycling and walking infrastructure.
- Option 3: Require residential developments over a certain size to incorporate public open space and amenity green space.

**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? Which ones, and why?**

---

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

---

#### 27. Social Policy Issue 1: Affordable Housing

Housing affordability is a long standing issue, in West Lancashire and elsewhere. House prices are high and rising, and the Council's ability to deliver affordable housing has been reduced over recent years. The usual policy approach has been to require a percentage of houses on schemes above a certain size to be affordable. Moving forward, there are various policy options to deliver affordable housing; several of these can be used together.

**The options are:**

- Option 1: Do nothing, i.e. have no policy on affordable housing
- Option 2: Continue with the 'usual' approach to affordable housing policy
- Option 3: Carry on with a broadly similar policy to policy RS2 of the current Local Plan
- Option 4: Add more detail to the Local Plan policy e.g. on house sizes and tenures
- 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
- Option 7: Allow for more flexibility when delivering affordable housing as part of larger market housing developments
- Option 8: Have greater flexibility in what the Council defines as affordable housing

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

---

**28. Social Policy Issue 2: Demand for self- and custom-build housing**

Self- and custom-build housing ('SCB housing') can take various forms, from individual houses designed and built by the person who will live in them, to 'grand design' type properties that are commissioned by the occupant but built by tradespeople, to more general housing built by volume housebuilders but with certain internal features chosen by the occupant. Interest in self-build and custom-build housing continues to rise, and national policy means that Councils must register demand for plots for such housing, and make adequate provision of sites, or plots, to meet that demand.

***The options are:***

Option 1: Do not allocate any sites for SCB housing

Option 2: Set aside parts of larger allocated housing sites for SCB plots

Option 3: Identify and allocate small sites for SCB dwellings in line with demand

**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 build your own home? Why?**

---

**29. Social Policy Issue 3: Demand for alternative residential accommodation**

People may choose to live in caravans (or park homes) and houseboats, rather than 'bricks and mortar housing'. Draft government guidance recommends local authorities measure the need for caravan and houseboat accommodation and then consider how to meet those needs. We expect to do a needs assessment over coming months, but can consider the policy options now.

***The options are:***

Option 1: Allow for caravan or houseboat accommodation to come forward as the market demands

Option 2: Allocate new sites, or land on the edge of existing sites, for additional caravan-based accommodation or mooring berths.

Option 3: Vary Green Belt policy on a site-specific basis, to allow for expansion or intensification of residential caravan sites or mooring berths to meet identified needs

**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 houseboats? Why?**

---

**30. Social Policy Issue 4: the Skelmersdale housing market**

The housing market in Skelmersdale is considered weaker than in other areas of the Borough. The regeneration of Skelmersdale, in particular the town centre, has been a long standing priority for the Council. There are policies and initiatives already in place to strengthen the Skelmersdale housing market, but, moving forward, there are other general policy options that could help achieve this goal.

***The options are:***

1) Continue to relax, or further relax policy requirements for housing sites in Skelmersdale

2) Base the Local Plan Review strategy on the regeneration and expansion of Skelmersdale

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

---

### 31. Social Policy Issue 5: The social requirements of older people

'Older people' covers a very broad group, but generally speaking 'older people' have a number of requirements - they should be able to access facilities (including health care), services and social networks; they should be able to engage with their local or closest communities; they should have access to public and/or private transport; they should have employment and training opportunities; and they should feel safe and supported. Planning can affect ease of access to facilities, social opportunities and transport.

**The options are:**

- Option 1: A general 'sustainable development' policy which directs new development to places where services and facilities are available
- Option 2: Allocate specific sites in appropriate locations for services and facilities.
- Option 3: Prepare an Area Action Plan or similar document to ensure facilities are provided as part of any very large new developments

**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?**

---

### 32. Social Policy Issue 6: Residential accommodation for older people

Older people have specific accommodation requirements - for example design features that can respond to people's changing health and mobility difficulties. It is expected that the housing market will, to an extent, deliver accommodation for older people. However, there are some concerns that provision for elderly needs is not receiving the priority it requires, and therefore there is a need for policy to prompt such delivery.

**The options are:**

- Option 1: Have no specific policy, but let the market deliver appropriate accommodation in line with local demand
- Option 2: Continue the current approach, i.e. require that a percentage of new dwellings be designed specifically to accommodate the elderly
- Option 3: In conjunction with the above, provide a tighter definition of what constitutes 'housing designed specifically to accommodate the elderly'
- Option 4: Adopt one or both of the optional Technical Standards\* for new houses
- Option 5: Require adherence to, or at least that regard be had to, the HAPPi (Housing our Ageing Population: Panel for Innovation) Design Principles\*\*
- Option 6: Allocate specific sites for elderly accommodation
- Option 7: Adopt the more general policy approach of promoting 'Lifetime Neighbourhoods'

\*The 'Technical Standards' are part of national Building Regulations, and require dwellings to be accessible for elderly or wheelchair-bound occupants, e.g. wide doorways, ground floor bathrooms etc

\*\* The HAPPi principles are a set of 10 design criteria relating to things such as good natural light, and room to move around. They are particularly relevant to older people's accommodation needs.

**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?**

---

### 33. Social Policy Issue 7: Provision of HMOs in Ormskirk

HMO's refer to Houses in Multiple Occupation. The increase in the number of HMOs has been an issue in Ormskirk for a number of years and has had effects on the area. The properties converted to HMOs typically tend to be at the cheaper end of the market, reducing the availability of first-time or affordable properties. In streets where the proportion of HMOs is high, the character of the street can be changed.

\*An Article 4 Direction, a legal tool that gives the Council extra control over development, was introduced in 2011 to control changes of use from dwellings to HMOs in Ormskirk, most of Aughton, and Westhead. Consequently, planning permission is needed to convert a house to a HMO in these areas. It works alongside policy RS3 of the current Local Plan, which limits the proportion of HMOs in a street, typically to 5%. We want to know how future policy should address HMOs.

**The options are:**

Option 1: Expand the 'Article 4 area'\* and the area to which the HMO percentage policy applies, to include neighbouring settlements

Option 2: Revoke the Article 4 Direction and policy RS3, and have no policy

Option 3: Decrease the HMO limit from current levels on all or specific streets to a lower percentage, potentially even down to 0%

Option 4: Increase the HMO limit from current levels on all or specific streets to a higher percentage.

**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?**

---

**34. Social Policy Issue 8: Provision of off-campus purpose-built student accommodation in Ormskirk**

In addition to HMOs, students can be housed in purpose built accommodation either on-campus or off-campus. The provision of on-campus accommodation is dealt with above in question 33. With regard to the provision of off-campus, purpose built student accommodation, there are a number of options.

**The options are:**

- Option 1: Continue with the current policy approach of restricting off-campus purpose-built student accommodation unless strict criteria are met.
- Option 2: Relax policy to allow purpose-built student accommodation away from the University Campus.
- Option 3: Allocate specific sites for off-campus student accommodation, whilst restricting 'unplanned' developments elsewhere.
- Option 4: Tighten the current policy to severely, or entirely, restrict off-campus, purpose-built student accommodation.

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

---

**35. Social Policy Issue 9: Delivering suitable accommodation for travellers**

For several years there has been, and is, a lack of authorised or suitable accommodation in the Borough for the travelling community. Providing accommodation for travellers has proved difficult, with the 'available' sites often found in unsuitable locations (for example in flood risk areas) and the 'suitable' sites not available for travellers to purchase. National policy requires the Council to allocate specific sites to meet local accommodation needs.

**The options are:**

Option 1: Allow the travellers based at present in West Lancashire to stay on their (currently unauthorised) sites.

Option 2: When allocating new sites for other development in the Borough, set aside part of those sites for travellers

Option 3: Compulsory Purchase\* of suitable sites in order to allocate them for travellers

\*A Compulsory Purchase Orders (CPO) is a legal function that would allow the Council to obtain land or property without the consent of the owner. To issue a CPO, the authority must demonstrate the land is necessary and there is a public interest. Compensation is usually provided.

**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?**

---

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

---

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

---