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Date: 11th December 2018
Our Ref: 01_01_07

Dear Mr Harrison,

Sefton MBC comments on West Lancashire Local Plan 2012-2050 Preferred Options Draft (August 2018)

Thank you for providing the opportunity for Sefton Council to comment on the West Lancashire Local Plan 2012-2050 Preferred Options Draft. Sefton Council's comments are set out below:

1. Housing Need and Supply

- 1.1 It is noted that West Lancashire wish to adopt a long time frame for their Local Plan. However, whilst not objecting to this, Sefton Council recognises that looking so far ahead has the potential to cause challenges for both West Lancashire and for neighbouring authorities such as Sefton, in a situation where there is considerable planning and demographic uncertainty. For example, the local, sub-regional and national context could change considerably over the next 30 years.
- 1.2 Given the above, and consistent with paragraph 33 of the National Planning Policy Framework, Sefton Council would urge West Lancashire to build into their Local Plan appropriate mechanisms to allow for its early review should planning or demographic circumstances in West Lancashire change which impact on the adequacy of their housing capacity in relation to Local Plan Objectively Assessed Need.
- 1.3 Furthermore, Sefton Council would urge that additional flexibility be built into the West Lancashire Local Plan to take account of emerging unmet needs in neighbouring local authorities (such as Sefton) which are different to, or more specifically higher than, the Plan's current assumptions. If an unmet need were to arise in Sefton at some future date, which could potentially be accommodated in West Lancashire, Sefton Council would intend to alert West Lancashire Council to this. We would expect this to be regarded as a material consideration in deciding whether it would trigger an early review of the West Lancashire Local Plan, consistent with paragraph 33 of the National Planning Policy Framework.

1.4 Sefton Council acknowledges that making any housing assumptions over such a long time frame is fraught with difficulties, and indeed we do not have robust evidence on housing need and land supply much beyond the end of the Sefton Local Plan period to 2030. Nevertheless, Sefton Council is unable to support West Lancashire's current assessment of unmet housing need in Sefton between 2027 and 2050 and considers that the figures proposed are too high for Sefton.

1.5 Based on Sefton's estimate of the balance between housing need and supply in Sefton to 2050 it is suggested that, using the best evidence available and officer judgement, we consider that West Lancashire should adopt the following revised position for Sefton:

(i) Sefton Council is confident that the adopted Sefton Local Plan (2017) includes housing allocations and other assumptions about housing supply which should comfortably meet the borough's housing need to 2030. This is based on a Sefton Local Plan housing Objectively Assessed Need of 640 dwellings per year to 2030. Furthermore, we believe that it is reasonable to assume that in aggregate borough-wide terms, Sefton will have an adequate housing supply to circa 2035, based on:

- The current Local Plan housing allocations, in the round, are expected to exceed their assumed housing capacity
- There is likely to be some 'carry over' of capacity on a number of larger sites post 2030
- Sefton has applied very cautious windfall assumptions which we anticipate will be exceeded (a point acknowledged by the Sefton Local Plan Inspector); and
- The fact that the Sefton Local Plan includes safeguarded housing land of an additional 49 hectares (with a potential capacity of around 1,000 further dwellings).

There is therefore, at this time, and assuming no unforeseen circumstances arise with regard to housing supply or need, no need for West Lancashire to make any assumptions about unmet housing need in Sefton up to 2035.

(ii) Assuming an indicative housing Objectively Assessed Need of around 500 dwellings per year for Sefton over the period 2030 to 2050 (based on the best evidence available and officer judgement), this should be disaggregated by an Objectively Assessed Need of approximately 200 dwellings per year for north Sefton and approximately 300 dwellings per year for south Sefton to reflect a crude proportionate population split.

(iii) Regarding south Sefton; Sefton Council considers it is not feasible at this time to make further assumptions about the scale of unmet need in south Sefton between 2030 and 2050. Detailed housing capacity work (which has commenced) should help inform future assumptions but no assessment has been made about Green Belt potential at this time, nor is one planned to be undertaken for the foreseeable future. The position is likely to become clearer when any Sefton Local Plan review is undertaken post-2020. Until this time, Sefton Council is not able to say whether or not there will be a housing need which cannot be accommodated in south Sefton between 2030 and 2050;

consequently, Sefton is unable to provide an estimated figure for borough-wide unmet housing need between 2030 and 2050, at this time.

- (iv) Regarding north Sefton and given the tightness of the Green Belt boundary around Southport and Formby and other potential constraints such as flood risk and environmental constraints which may be not be fully addressed as yet; there is the possibility of housing need/supply challenges post-2035 in Southport and post-2040 in Formby. Allowing for further urban housing opportunities and windfall sites, in Southport there could be a housing shortfall of around 500 dwellings up to 2040 and a further shortfall of around 1,000 housing units between 2040 and 2050. For Formby there could be a housing shortfall of around 500 dwellings between 2040 and 2050.

Looking at the above figures in the aggregate, and acknowledging the significant number of uncertainties involved, there is a possibility of around 2,000 dwellings unmet need for Southport and Formby over the period to 2050; with about a quarter of this (around 500 dwellings), required between 2035 to 2040, and a further 1,500 (approximately) dwellings required between 2040 and 2050.

- 1.6 However, regarding the period post-2035, it should be born in mind that the above figures in paragraph 1.5 are based on officer assumptions made in the absence of robust evidence at this time, and these may or may not be realised. Sefton Council therefore reserves the right to update and amend these figures as new evidence becomes available.
- 1.7 Regarding the absence of proposed sites on the eastern edge of Southport, Sefton Council would seek clarification about the constraints for this area, in relation to other proposed sites and the rest of West Lancashire.

Affordable housing

- 1.8 Subject to paragraph 1.6 above, West Lancashire Council should bear in mind that it is likely that some 30% of the approximately 2,000 dwellings unmet need in Sefton (i.e. around 600 dwellings) which might arise between 2035 and 2050 in north Sefton will be for those in affordable housing need. This is based on the 2014 Sefton Strategic Housing Market Assessment (SHMA). While this is being reviewed via the 2018 SHMA, the broad picture is not expected to change significantly.
- 1.9 It is highly unlikely that this affordable housing need could be accommodated on housing sites to the east of Ormskirk or similar, because such needs have to be met where they arise i.e. in Southport or Formby or as close to these settlements as is possible. Given this, if the West Lancashire Local Plan is taken forward in the manner currently proposed, there would need to be a careful dialogue between West Lancashire Council and Sefton Council as to how these affordable needs (as opposed to wider market needs which are more flexible in terms of appropriate locations) might best be accommodated and Sefton's needs met.

Gypsies and travellers

- 1.10 Sefton Council notes policy H6: Gypsy and Traveller Sites. It is noted that the full traveller needs to 2037 are unable to be met due to lack of land availability (paragraph 5.85). Instead a criteria based policy approach is set out and broad

locations for growth are identified. However, as West Lancashire are undertaking a review of the Green Belt, to meet long-term needs for wider housing and employment needs, Sefton considers that it is important that the same approach be applied to traveller accommodation. In Sefton's experience a criteria-based policy approach for delivering traveller accommodation rarely delivers sites. Whilst it is acknowledged that West Lancashire has sought to identify sites for travellers, and that this can be a challenging process, it is considered that the potential remains to do this through the review of the Green Belt. Sefton considers it is important that its neighbouring authorities meet their own traveller accommodation needs to reduce the demand on Sefton's traveller sites and the potential for increased unauthorised encampments in general.

2. Employment land

- 2.1 Sefton Council notes that in terms of employment requirements, policy EC1: Delivering New Employment Development set out a proposed requirement of 190 hectares.
- 2.2 The preparation process for the Sefton Local Plan highlighted the challenge of identifying new employment land allocations in North Sefton. While Sefton's current Local Plan identifies an extension to the existing Southport Business Park (and at land North of the Formby By-Pass), in order to meet these longer-term employment needs post 2030 it may be necessary to look to sites in West Lancashire adjacent to or as close as possible to Southport Business Park and its environs. This possible need will not be quantified until Sefton undertakes a Sefton Local Plan review post-2020. However, based on the best evidence available and officer judgement, a replacement Southport Business Park would imply a need of around 12 hectares (net). It is noted that to date this is not taken into account in this West Lancashire draft Local Plan. Sefton Council would welcome on-going co-operation regarding eastward expansion of Southport Business Park into West Lancashire within the plan period proposed by West Lancashire.
- 2.3 The proposed allocation of approximately 70 hectares of Large-scale B8 uses as part of a Logistics Park at Junction 3 of the M58 is noted (policies EC1: Delivering New Employment Developments and SP7: The Creation of Garden Villages and Employment Area to the west and south-west of Skelmersdale). In principle, Sefton Council recognises that this could be an appropriate location for such use. However, it will be critical to understand the impacts of any proposals on the highway network, especially in relation to the strategic employment site at Land East of Maghull, Switch Island and the route to the Port of Liverpool, together with the associated consequences for air quality, noise and other environmental and health impacts on local communities along the affected routes (and see comments in section 4 below). Sefton Council looks forward to on-going cooperation on this issue.

3. Retail issues

- 3.1 Sefton Council notes that the identified future borough wide needs for town centres uses will primarily be met within Skelmersdale Town Centre and Development Opportunity Sites within Ormskirk Town Centre and that local and/or neighbourhood centres may be developed, subject to Masterplans, in garden

villages to the west and south-west of Skelmersdale, to the south-east of Ormskirk and Aughton and at Yew Tree Farm, Burscough (policy EC4: Vibrant Centres). Sefton Council supports the principle of this approach.

4. Transport

- 4.1 Sefton Council is in the process of reviewing the Transport Assessment for the West Lancashire Local Plan Review and the other transport related documents. Further detailed comments and queries related to the Transport Assessment will be provided in a separate response to follow once the review has been completed. Some initial comments are provided below.
- 4.2 The West Lancashire Local Plan needs to consider the transport infrastructure requirements of new development close to the Sefton boundary and additional land-use implications of how Southport can be better served and linked to the national road and rail networks in the future. This should include the reinstatement of the Burscough Curves, which is included in the Liverpool City Region Long Term Rail Strategy. It is noted that policy IF1: Strategic Transport Infrastructure seeks to support the delivery of and/or not prejudice the delivery of an appropriate rail link between the Ormskirk Preston line and the Southport-Wigan line and this is welcomed in principle.
- 4.3 The Local Plan should also take account of Sefton's emerging proposals for improving the eastern access to Southport, and Sefton Council looks forward to on-going cooperation on this issue. Further details will be provided in Sefton's detailed transport comments.
- 4.4 West Lancashire Local Plan review also needs to consider the impact that future development in West Lancashire will have on the wider highways network in Sefton, particularly the A59 and Switch Island, which are already at or close to capacity, and provide one of the key road connections from Ormskirk, Burscough and the Northern Parishes to Liverpool.
- 4.5 It is noted that policy IF1: Strategic Transport Infrastructure refers to Electric Vehicle Recharging points.
- 4.6 Sefton Council looks forward to on-going cooperation on these transport and related air quality issues, including linkages with Liverpool City Region air quality initiatives and studies. More generally Sefton Council would seek cooperation on extending and enhancing cross-boundary path, cycle route and green infrastructure networks including the Coast Path and routes away from the Coast which formed part of mitigation for recreation pressures on the Sefton Coast (see below).

5. Ecological issues including Habitats Regulations

- 5.1 The reference to ecological networks in West Lancashire and the need for cross-boundary links to the Liverpool City Region Ecological Network evidence base is noted. Sefton Council would welcome an explicitly positive approach towards opportunities for habitat creation, enhancement and management including cross-boundary linkages and extension of the City Region Nature Improvement Areas.

This would be helpful as part of a strategic response to pressures elsewhere in the plan area and in line with the 25-Year Environment Plan.

- 5.2 The Local Plan should be strengthened to make sure that development does not lead to adverse effects on the integrity of internationally important nature sites, and their supporting (functionally linked) habitat. This includes international nature sites on the Sefton Coast as well as those in West Lancashire or elsewhere, where potential adverse impacts include disturbance largely due to visitor pressure and loss of habitat and supporting habitat, and may include water quality (including rivers and groundwater) and other impacts or designation features. These issues will need to be specifically addressed in the Habitats Regulations Assessment (HRA) of the West Lancashire Local Plan.
- 5.3 For example, the need to make sure there are no adverse effects on the integrity of internationally important nature sites should be added in to Objective 10 as well as the third full bullet point of 'Key issues' on page 11 of the draft Local Plan. Policy SP1: Delivering sustainable development and other strategic policies, Policy EC3: The Rural and Visitor Economy, policy IF4: Low Carbon and Renewable Energy Development and policy G13: Nature Conservation and Ecological Networks should include explicit protection of internationally important sites in line with the Habitats Regulations, and specific mention of both the Sefton Coast sites and the potential impact so visitor pressure, habitat loss or disturbance and other advise impacts.
- 5.4 The Habitats Regulations Assessments relating to the Sefton Local Plan and the development plans of all of the other authorities in the Liverpool City Region have identified potential adverse 'in combination' effects from the quantum of new housing or tourism development on visitor pressure on the Sefton Coast, and loss of or disturbance to supporting habitat. This is important given the quantum of housing and tourism development proposed in West Lancashire, the relatively proximity of proposed West Lancashire's housing development sites to the internationally important nature sites on the Sefton Coast, and our understanding that a many coastal visitors to Sefton (Sefton Coast SAC) in particular originate in West Lancashire.
- 5.5 This issue should be specifically addressed in the Habitats Regulations Assessment of the West Lancashire Local Plan. Sefton Council is in the process of reviewing this Habitats Regulations Assessment document and will provide more detailed comments in due course in a separate response. The Local Plan should set the policy context for the Borough's approach to mitigation of recreation pressure recreation, commensurate with the emerging City Region-wide Recreation Mitigation Strategy although it should be noted that this work is at a relatively early stage.

6. Other environmental issues

Flood risk and coastal change

- 6.1 Cross-boundary flood risk issues include tidal and river flood risk in the Alt-Crossens catchment, including allocated or other sites adjacent to the River Alt and the Crossens systems (for example proposed site HW1) and the impacts of changes to the land drainage regime through the lower catchment and rural area. They also include the surface water flood risk from the proposed sites adjacent to

the Sefton boundary. Policy SD4: Managing Flood Risk should include an explicit requirement that development does not increase flood risk elsewhere; that is, outside the site. It should be made clear that this applies to flood risk from all sources, that is, including surface water flood risk and discharge into watercourses.

- 6.2 The Sefton Local Plan (2017) designates a Coastal Change Management Area which extends to the boundary with West Lancashire. It is noted that policy GI6: Coastal Zone does not refer explicitly to coastal change. Also GI6 does not refer to the capacity of the natural (salt-marsh) coast to form a natural sea defence on its own, but only in connection with 'secondary sea embankments', and West Lancashire may wish to look at this issue again.
- 6.3 Sefton Council looks forward to on-going cooperation on flood risk and coastal change issues.

Energy

- 6.4 It is not clear from Appendix A or policy IF4: Low Carbon and Renewable Energy development or its explanation whether the site 'Adjacent the River Alt, Great Altcar' or other sites adjacent to or close to the Sefton boundary are proposed for wind energy development in this Local Plan, and so it is not currently possible for Sefton to comment on this.
- 6.5 Sefton Council would seek clarification of energy issues including the evidence base and the assessment process for identifying sites or broad areas, linkages with Liverpool City Region renewable energy and air quality initiatives and studies and other issues, as part of on-going cooperation. Sefton Council would want to be confident that, taking these into account, the evidence base justifies the policy position regarding energy, including any decision to identify or allocate land which may impact on Sefton for onshore wind

7. Infrastructure

- 7.1 Sefton's Local Plan requires social, community, environmental and physical infrastructure to be protected, enhanced and provided where there is an identified need to support sustainable communities (policy IN1 'Infrastructure and development contributions'). Residents of any West Lancashire development site close to Sefton would be likely to draw on services and facilities in Sefton. These include schools, doctors and other health services, and community, sports and recreation groups. This applies mainly to Southport but to a lesser extent to Formby and perhaps even Maghull/Lydiate.
- 7.2 Sefton Council would wish to cooperate with West Lancashire to make sure that the West Lancashire Local Plan and the wider planning process provides appropriate legal mechanisms to help the deliver necessary infrastructure within Sefton, and put in place explicit policies and guidelines to make it clear how such cross boundary dependencies and needs would be considered, agreed and delivered.

8. Overview

A number of specific issues have been identified above where further cross-boundary cooperation is required and where the desired outcomes for Sefton may include changes to the emerging West Lancashire Local Plan. These include housing, employment land, transport, energy, air quality and ecological issues, and we would want to work positively and proactively with you on all of these as your plan progresses.

More generally, Sefton Council looks forward to maintaining effective co-operation with West Lancashire as part of the on-going cooperation with its neighbouring authorities including West Lancashire and authorities in the Liverpool City Region.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Stuart Barnes', is positioned above the printed name.

Stuart Barnes
Interim Head of Economic Growth and Housing