

**West Lancashire Local Plan 2023-2040**

**Scope, Issues & Options Feedback Report**



**West Lancashire Local Plan 2023-2040: Scope, Issues and Options  
Consultation (Regulation 18) Feedback Report**

# West Lancashire Local Plan 2023-2040

## Scope, Issues & Options Feedback Report

### Contents

1.	Purpose of the Report and Background .....	1
CONSULTATION RESPONSE SUMMARIES .....		2
2.	Scope of the Local Plan .....	2
3.	A Portrait of West Lancashire.....	14
	Skelmersdale with Up Holland.....	14
	Ormskirk with Aughton.....	16
	Burscough .....	17
	Northern Parishes .....	19
	Eastern and Southern Parishes .....	20
	Western Parishes .....	22
	Social and Demographic Matters.....	24
	Economic Matters.....	26
	Transport and Infrastructure .....	28
	Natural and Built Environment .....	29
4.	Issues Affecting West Lancashire.....	33
5.	Vision.....	43
6.	Objectives and Indicators.....	49
7.	Strategic Policy Options .....	58
	ST01 – DELIVERING SUSTAINABLE DEVELOPMENT.....	58
	ST03 – RESPONDING TO THE CLIMATE EMERGENCY AND CREATING ENVIRONMENTAL SUSTAINABILITY .....	68
	ST04 – SETTLEMENT BOUNDARIES, PROTECTED LAND AND GREEN BELT .....	75
8.	Housing and Communities Policies .....	90
	HC01a – WHERE HOUSING CAN GO.....	90
	HC01b – USING LAND EFFICIENTLY .....	98
	HC01c – DWELLING SIZES.....	106
	HC01d – AFFORDABLE HOUSING .....	110
	HC01e – HOUSING FOR OLDER PEOPLE .....	114
	HC01f – CUSTOM AND SELF-BUILD HOUSING .....	117
	HC01g – STUDENT ACCOMMODATION .....	121
	HC01h – CARAVAN AND HOUSEBOAT DWELLERS .....	124
	HC01i – GYPSIES AND TRAVELLERS & TRAVELLING SHOWPEOPLE.....	125
	HC01j – TEMPORARY AGRICULTURAL WORKERS .....	128

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

HC02 – PLACE-MAKING.....	129
HC03 – HERITAGE.....	133
HC04 - COMMUNITY FACILITIES.....	135
9. Economy and Employment Policies.....	139
EE01 - PROVIDING AND MANAGING EMPLOYMENT AREAS.....	139
EE02 - DEVELOPING THE RURAL AND VISITOR ECONOMY .....	142
EE03 - ADAPTING OUR TOWN AND LOCAL CENTRES.....	144
EE04 - SKILLS AND EDUCATION.....	147
10. Environment and Health Policies.....	152
EH01 – NATURE.....	152
EH02 – PRESERVING AND ENHANCING THE BOROUGH'S LANDSCAPE / LAND RESOURCES.....	156
EH03 - FLOOD RISK AND WATER RESOURCES.....	160
EH04 – CONTAMINATION AND POLLUTION .....	163
EH05 – AIR QUALITY.....	165
EH06 - GREEN INFRASTRUCTURE & OPEN SPACE .....	167
EH07 - HEALTHY EATING AND DRINKING.....	176
11. Transport and Infrastructure Policies .....	180
TI01 – TRANSPORT NETWORKS .....	180
TI02 – PARKING STANDARDS AND ELECTRIC VEHICLE CHARGING POINTS .....	183
TI03 – COMMUNICATIONS AND DIGITAL CONNECTIVITY.....	185
TI04 – RENEWABLE AND LOW CARBON ENERGY GENERATION .....	187
TI05 – ENERGY EFFICIENCIES IN NEW BUILDINGS .....	190
TI06 – WATER EFFICIENCY.....	194
12. Other Policies.....	197
OT01 - SEQUENTIAL TESTS.....	197
OT02 – VIABILITY.....	198
OT03 – DEVELOPER CONTRIBUTIONS.....	203
13. Comments on the consultation process.....	207

## **1. Purpose of the Report and Background**

- 1.1 This report provides summaries of all responses made to the Local Plan 2040 Scope, Issues and Options consultation. This consultation was carried out under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 and ran for ten weeks from 18 November 2021 to 27 January 2022. The main consultation document(s) comprised the "Local Plan 2040 Scope, Issues and Options consultation" paper which covered the following topics:
1. Scope
  2. Portrait of West Lancashire
  3. Issues
  4. Vision
  5. Objectives
  6. Indicators
  7. Policy Areas
- 1.2 A total of 232 individuals and organisations responded to the Scope, Issues and Options consultation, generating several hundred separate comments on a variety of topics. The majority of respondents used the online survey tool to submit their consultation. In a small number of cases, respondents sent in separate written feedback and these were added to comments received online.
- 1.3 The main Scope, Issues and Options document was consulted on alongside other material, including an update to the Strategic Housing and Employment Land Availability Assessment (SHELAA). Comments were also received on site-specific matters and summaries of these are set out in a separate "SHELAA 2021 Feedback Report".
- 1.4 The following sections provide summaries of comments made to the consultation in the order of the published paper and by specific question. Wherever known, the comments have been grouped according to type of respondent, including: local residents and members of the public; community groups; elected Members and Parish Councillors; private organisations and businesses; landowners, developers, housebuilders and agents; statutory consultees; and other interest groups.

**CONSULTATION RESPONSE SUMMARIES**

**2. Scope of the Local Plan**

A total of 119 respondents made comments in relation to Scope of the Local Plan.

**Questions:**

**1. Is there anything else you think the new Local Plan should cover?**

72 respondents answered this question.

Residents and members of the public:

*Green Belt / Grade 1 agricultural land*

- Prioritise preservation of Green Belt - for environmental requirements and for mental health benefits
- Given amount of top quality agricultural land and capacity for food production, explicit reference should be made to preserving this to contribute to UK's food security
- Benefit to economy of Grade 1 agricultural land; Plan should take account of this dwindling resource; hierarchy of site selection with presumption against development on existing Green Belt if other sites are available; Green Belt should have a hierarchy e.g. Grades 1-5, based on Agricultural Land Classification
- Refer to West Lancashire's strategically important contribution to food supply; preserving scarce land resources is more important than new housing and employment land
- Maintaining the capacity to produce healthy and environmentally friendly local food
- New development will affect capacity to produce local food reducing food miles
- No building on Green Belt in Parbold
- There are no exceptional circumstances where Best and Most Versatile Agricultural Land should be used for development
- Strategic protection of most productive farm land for future generations
- Release all brownfield land available, why has West Lancs only used 38% of this?; stop building on greenfield; all Plan B sites should be put back into the Green Belt
- Government states more housing and business land needed but imperative this is only done on infertile land and brownfield sites; according to estimates by the Food and Agriculture Organization (FAO), by 2050 we will need to produce 60 per cent more food, more important as we have now left the EU; we must conserve all the productive farm land especially in West Lancs as has some of the most fertile land in the UK. Ethically must not build on Grade 1/2 agricultural land as could cause catastrophic food shortages in future; must not be influenced by the fact that it is easier and cheaper to build on farmland than brownfield

*Environment / Sustainability / Climate change / Wildlife / Habitat*

- Protect existing housing from increased pollution, noise and congestion
- Climate change and environmental sustainability should be the top priority of the plan. with the protection of green belt second
- Policy on eliminating the use of plastic as much as possible
- Introduce a zero waste to landfill policy as waste releases CH4 and CO2
- Require energy efficiency in changes of use, not just new build; have conditions that require insulation, green energy; will create more sustainable buildings and stimulate a green economy

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Protect and promote wildlife in gardens, set up projects to encourage this, involving the community
- Policy wording needs to be more specific e.g. how does this development attract as much wildlife as possible; how does this development fully utilise trees for flood control
- Emphasise mental health benefits of open space - these should be preserved
- Policy to control light pollution in residential, industrial, on trunk roads through type and design of street lighting - to avoid light spill and consider cut off times e.g. on roads when light traffic
- Policy to make existing housing energy efficient, improve appearance of older housing estates
- Energy and water efficiency to all buildings, not just new build
- Biodiversity, the protection of wildlife, flora and fauna is intrinsic to the local environment and the general amenity of the local residents;
- Protection and enhancement of wildlife
- Provide more Countryside Rangers
- Detailed survey of agricultural land to determine which areas should not be built on; Council to produce a declaration of climate emergency. Modify building regulations to ensure all new developments to be eco friendly, roofs to be south facing and solar panels fitted, green and grey water systems SuDS systems to be better than agricultural run-off.

#### *Traffic / infrastructure / development general*

- Impact on local facilities; increases in congestion and reduce road safety
- Get new businesses in Skelmersdale town centre- would reduce deprivation and crime
- Improve connectivity and broadband speeds to all houses, not just urban area
- The plan should look to meet the needs and change as said needs adapt. The provision of both employment and housing land should be seen as minimums and not as maximums
- More priority to be given to good design
- Personal safety and property security
- Future proofing of buildings - leave enough space to expand
- Need training for retrofitting of buildings to give local trades more work; Better building regulations - all buildings should be carbon neutral
- If Green Belt has to be developed, make sure sustainable building products and practices are used e.g. green roofs, allotments created New development will affect: GPs, dentists, hospitals will be affected by population increase; will cause air pollution and congestion; building over wildlife habitats and lead to over-population
- Impact of new development on already congested roads
- Increase in traffic, noise and pollution
- Additional development should be adjacent to existing settlements; for the developers ease of continuation of services supplied to each project; Should not create development islands which need separate infrastructure with added cost and ruination of nearby countryside;
- Distancing of industrial and residential uses; reduce HGVs on unsuitable roads
- Adding charging points to new builds does not mean people will own electric cars as they are not affordable to the majority of people

#### *Transport, active travel and accessibility*

- Transport network should provide for cycle and walking routes

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Separate out cycle and footpaths from "transport networks and access" as a separate heading; add criteria requiring discussions with e.g. LCC, Environment Agency on cross-cutting issues in West Lancs e.g. waste collection, footpaths
- Environment and Health - add "and the health benefits of physical exercises"
- Encourage opportunities for outdoor exercise
- Cycling and walking should also be considered under health, not just transport
- Need to encourage alternatives to cars to combat climate change
- Improve public safety on public transport e.g. at isolated rail stations
- Create green multiuser off-road networks
- Better buses between rural and urban areas
- Rectify poor transport provision around Skelmersdale; it has been cut off for too long

#### *Water, drainage and flooding*

- Manage sea flooding to protect communities, Grade 1 agricultural land and the Mosses
- When large housing development is planned, there needs to be the infrastructure to go with it e.g. roads, schools, medical centres, shops etc
- Add "drainage" to "Flood Risk and Water Management"
- Do not allow development on floodplains
- Reduce flooding
- More emphasis on flooding and climate change
- More attention paid to run off water from new development

#### *Places and communities*

- More affordable houses in places like Newburgh as people who grew up there cannot afford to remain due to lack of affordability
- Protect villages so they are not over-developed or become suburbs of larger towns
- Planning for an aging population
- Enable elderly people to be able to stay in their own homes for longer
- Consider housing for single young adults, not just older people
- There needs to be more help for poor people
- Less on GREEN more spent on urgent matters facing all councils today. Green comes later.
- Needs to take account of Burscough Neighbourhood Plan
- East Quarry on Appley Lane North, Appley Bridge was once a working quarry but that was 30 years ago. It is still classed as an industrial area / brownfield site, but it is now a lake with habitat of rare and protected species of birds (swans, kingfishers, grebe etc), wildlife (3 species of bat, great crested newt), flora and fauna; area could be recognised by Natural England as Site of Significant Scientific Interest (SSSI). Request that this area known as East Quarry, Appley Bridge, Wigan now be re-categorised as green belt and afforded protection.
- No need for major releases of green belt around Appley Bridge when we have a plentiful range of other options; a number of sites in and around the village have been unsuccessful due to the proposed sites being on greenbelt land, which has continued to protect our current environment
- Retain all Green Belt especially around Appley Bridge and West Quarry; East Quarry could be a residential/leisure/nature reserve built on the rock surrounding the quarry - this previously had planning permission
- As residents of Appley Bridge, consider the current Local Plan 2012-2027 has served the village well and would be happy if new Local Plan were to take a similar format
- Slow down traffic on Appley Bridge North e.g. speed bumps

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Bickerstaffe: Long standing sewerage problem from the waste area opposite Long Lane; pipeline does not have sufficient gravitational fall - needs more investment; lack of facilities and public transport; too much traffic; need long term maintenance after development has taken place - WLBC need to ensure this is put in place
- Bickerstaffe - need to consider increased infrastructure e.g. schools, GPs if allowing more development; Forests around the area support wildlife - should be protected from development; Bickerstaffe agricultural farm land is essential for food production in our country and local people; Building on extensive areas of green belt/agricultural land will take away precious greenery, farm land, forests, wild life, food production and will affect quality of life; removing wooded areas and green belt affect on climate change, increase pollution, traffic congestion and energy use; development would also put added pressure on existing services and infrastructure
- The Plan goes against the Government's initiative is to use brownfield land; There is a large amount of brownfield land in Skelmersdale that should be used instead of taking away agricultural land;
- Traffic congestion is a current issue along the M58, M57, M6 and the Ormskirk/Burscough area. Adding further residence at this scale would add to these pressures and add to air pollution

#### *General*

- All consultants and WLBC should be required to identify and publish the sources of data used so the electorate can verify if their data differs from the ONS's whose initial data follows consistently from the National Census of 2011. It is recommended that the NUSAP (number, units, spread, assessment & pedigree) process be used to validate the quality of the data, remembering that data are not information
- There is no financial information anywhere in the Consultation: without this a Plan will not be credible

#### Borough, Parish, Town Councillors / Community Groups:

- Hard for layperson to comment on what should / shouldn't be included as don't know the scope of the Local Plan
- Include policies on allocation and control of waste management and landfill in Environment and Health policies; there are existing businesses that operate outside the scope of regulatory authorities - more environmental protection should be given
- Protect existing industrial areas and ensure working to licences and conditions  
Fine companies who put in retrospective planning apps - both happen at Simonswood;  
West Lancs Borough Council should be able to assist Lancashire County Council in the waste transfer planning applications and to be able to recommend if companies need enforcement notices served. this would provide local knowledge and help to have regular site visits as we recognise the planning office in Lancashire County Council is quite a distance away.
- Protection of agricultural land for food sustainability and climate change.
- Effects on Appley Bridge are: the need for more detailed planning cooperation between the various Authorities which serve this community; the inappropriate application of planning policies to such a large community; the insufficiency of services, facilities and infrastructure
- Protect Green Belt and most versatile growing land
- Aughton Residents Group: Do not pursue any development on productive agricultural land; this would fly in the face of the Council's stated ambitions to promote a greener healthier environment and the Climate Emergency it declared in 2019 and be contrary to the NPPF



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Organisations, including developers, landowners and representatives:

- Policy to encourage preservation and active use of heritage assets; reduce number of Buildings at Risk; climate change should be at the top of the agenda

#### Satplan on behalf of Gleeson Homes

- Encouraging to see reference to updated housing requirements, ageing population and need for elderly accommodation; agree need for significant economic growth to attract younger economically active households to help the competitiveness of West Lancashire. To ensure this is achieved, imperative to ensure correct quantum, type and location of new housing can be achieved

#### Emery Planning submitting on behalf of Wain Estates Limited

- The decision to pursue a significantly shorter plan period, to simply fulfil the Framework's minimum 15-year requirement is a negative step; NPPF states that for larger scale development the Plan should look up to 30 years
- Consider extending plan period to say 2042, to provide inbuilt flexibility to deal with delays in adoption of Plan, which are all too common
- Government support housing requirements in excess of the standard method; would also allow for more affordable housing
- Council has previously stated that pursuing a housing requirement in line with the standard method would have significant adverse impact upon economy and social sustainability; this plan presents an opportunity to drive economic growth and address demographic issues, such as aging population and need for affordable housing.

#### Savills on behalf of Harworth Group

- Essential the Local Plan is positively prepared and aspirational for the scale of homes and jobs supported, and that Standardised Methodology is taken as a minimum
- Skelmersdale is well placed to capture economic growth from the Liverpool City Region and the NW; an aspirational growth target higher than Standard Method should be set, given the need for industrial and warehousing floorspace, job creation and housing within a sustainable distance of employment West Lancashire is well located to the strategic highway network and air, rail, and sea ports; strategic policies and sites must reflect this
- Policies must encapsulate changes in market demand, and need for development to be viable and capable of being brought into operational uses without excessive marketing periods - which could mean greenfield development
- M58 locations represent major opportunity to capture investment

#### Vernon

- Housing requirements should be considered at a level higher than standard method to 'future proof' the Plan and to highlight exceptional circumstances that exist to justify green belt release; sustainable urban extensions and garden villages should be considered

#### Aster Planning on behalf of Richborough Estates Ltd.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Housing and Economic Development Needs Assessment (“HEDNA”) should inform the Borough’s spatial strategy and approach to the selection of site allocations, shaping the wider strategic and detailed policies
- Engagement with authorities involved in the Liverpool City Region Spatial Plan should be continued in a meaningful way to consider whether neighbouring authorities identify any unmet housing and/or employment land needs in the medium and longer-term

Smith and Love on behalf of Mr David Hill

- Support the proposal to restructure and amend Policy RS1 and include a Rural Exception Sites policy; however that rather than being a sub-part of a longer policy, include a specific policy for Rural Housing Exception Sites.

Savills on behalf of Harworth Group

- Essential that quantum of development is reflective of identified need for housing and employment and to support growth shown through current market demand, and that the Plan fully reflects impacts of the Covid-19 pandemic in terms of changes in market requirements.

#### Statutory consultees and other organisations:

Sustrans

- Policies should include cycling networks; a robust network of high quality routes is necessary for active travel to become a realistic alternative to vehicles; guidance from Local Transport Note 1/20 should be explicitly mentioned with an ambitious goal to reduce reliance on private transport towards active travel and public transport journeys

National Highways

- Encourage patterns of growth that minimise need to travel and promote use of sustainable modes, however, patterns of growth should be promoted solely on basis of minimising travel on the SRN, nor should this preclude development that seeks to capitalise on the connectivity of the SRN, provided it can be demonstrated through evidence that these sites can be safely and sustainably accommodated by the SRN (any resulting improvements / capacity enhancements necessary should be identified in the Infrastructure Development Plan); Plan's policies should be cognisant of National Highways’ perspective
- Support the focus on environment and air quality

The Wildlife Trust for Lancashire, Manchester & North Merseyside

- "Preserving and enhancing the Borough's nature" should read 'Conserving, enhancing and restoring the Borough's nature'; "conserving" rather than "preserving" as the latter relates to maintaining status quo in stasis which is not possible for dynamic ecosystems, particularly with climate change
- Government commitments to reversing nature decline and BNG net gain require significant restoration of what has been lost and for it to be delivered in a strategic manner through Local Nature Recovery Networks and Strategies underpinned in 2021 Environment Act
- Note that authority has declared a climate emergency in isolation but the climate and nature emergencies are inextricably linked
- BNG net gain should be greater than 10% in West Lancashire, where intensive and expansive agricultural and built development have meant historic losses of semi-natural habitats and diversity of native flora and fauna over a wide area

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- "Green Infrastructure" should be expanded to "Green & Blue Infrastructure" - blue infrastructure is particularly important in a largely low-lying borough with a naturally high water-table; large areas of associated peat soil are rapidly oxidising due to artificial pumped drainage, lowering ground level and increasing vulnerability to flooding and wind-blow of residual sands and silts; extensive network of agricultural drains, ditches open water bodies, and channelised watercourses draining sediment, agricultural and road run-off water from farmland and roads downstream onto other farmland and into towns, estuaries and Irish Sea
- Effective and efficient blue infrastructure management in association with future development (and retro-fitting) is of key importance

#### Natural England

- Expect biodiversity, geodiversity, ancient woodlands, soils, priority habitats, ecological networks and protected species to be covered under natural environment
- Approach to nature protection could be more robust by references to "restoring / restoration" where appropriate, e.g. Preserving, restoring and enhancing the Borough's nature
- Would like to see the new Plan's policy objectives being measured by specific targets

#### The Canal and River Trust

- The waterways of West Lancashire can play a significant role in promoting health and wellbeing across all social and economic groups
- Within Transport and Infrastructure Policy should promote role of active travel - canal towpaths have a multi-functional use and assist in promotion of walking, cycling, health and wellbeing, reducing car dependence and reducing air pollution and congestion.
- Include a specific policy relating to canals

#### Sport England

- More emphasis to protecting sporting facilities and greater opportunities to participate in formal and informal activities. Should consider the Sport England's 12 Planning for Sport Principles, particularly: Recognise and give significant weight to the benefits of sport and physical Activity; Plan, Design and maintain buildings, developments, facilities, land and environments that enable people to lead active lifestyles.

#### The Coal Authority

- Records indicate that there are recorded coal mining features present at surface and shallow depth; these may pose a potential risk to surface stability and public safety
- Records also indicate that surface coal resource is present, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable; consideration should be given to such advice in respect of the indicated surface coal resource; the Coal Authority provide the LPA with downloadable GIS data in respect of Development Risk and Surface Coal Resource plans.
- Would expect inclusion of a policy in any Local Plan that addresses risks posed to development by coal mining legacy and land instability and sets appropriate criteria for its consideration
- Any sites being consideration for future development should be assessed against the downloadable data we provide to the LPA in order to ensure that any constraints or issues can be identified at an early stage

#### CPRE, The Countryside Charity

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Conservation of heritage assets for quality of life; conservation is not a passive exercise, it requires policy on maintenance and use of heritage assets and for development within their setting to make a positive contribution to local character and distinctiveness
- Conservation is not a standalone exercise satisfied by standalone policies that repeat the NPPF. The Local Plan should also consider role of historic environment in delivering other planning objectives such as building a strong economy, ensuring vitality of town centres; should consider the following factors: How the historic environment can assist in the delivery of the vision and objectives; How the Plan will address heritage at risk; How local lists might assist in identifying and managing the conservation of non-designated heritage assets; How the archaeology of the Plan area might be managed; How CIL funding might be used to ensure a sustainable future for individual assets or specific historic places; Whether masterplans or design briefs need to be prepared for significant sites where major change is proposed; What implementation partners need to be identified to deliver the strategy; What indicators should be used to monitor the effectiveness of the strategy
- Should have policies and allocations that enable needs to be met in a sustainable way, reducing greenhouse gas emissions, reversing environmental degradation, and affording future generations with high grade farmland, enhanced biodiversity and conserving the rural character of the area
- Rural economy should be fully valued and championed to increase quality of life of residents, businesses and support visitor economy to attract inward investment in a way that enhances natural and built environment
- Rural landscapes should be protected and conserved with policies to avoid industrialisation of the countryside

#### Lancashire County Council

- The Plan as a whole needs to articulate and support an overall vision for sustainable growth and development and should explore potential strategic development options
- Need to take account of evidence bases prepared for Lancashire Independent Economic Review and Environment Commission; as priorities emerge these will need to be reflected within the Plan
- The relationship of the Borough to the Liverpool City Region and its growth priorities also needs to be taken into account
- As part of the Service Level Agreement there is provision for the Historic Environment Team to provide comment/advice on any proposed new Historic Environment Policies and should WLBC be considering altering or re-writing historic environment Policy, we would be happy to do so
- LCC as the Lead Local Flood Authority made a number of detailed comments which will be taken into account in the Local Plan, including on flood risk, SuDS, Natural Flood Management, ensuring Policy wording takes account of national policy e.g. "Green infrastructure" should be "Blue-Green infrastructure", biodiversity net gain, allowance for urban creep and increases in paved surface areas; defining 'previously developed site' and 'greenfield sites' in drainage terms and to define what requirements are applicable to each; climate change allowances, discharge of surface water into watercourses; easements from banks of watercourse to allow access for future maintenance; avoiding and minimising culverting watercourses; reference to "critical drainage areas" and whether the term is still appropriate to consider using different or updated terminology to avoid confusion

### **2. Is there anything in the list above that you think should NOT be included in the new Local Plan?**

39 respondents answered this question.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Residents and members of the public:

- Housing development in Aughton and Ormskirk - local infrastructure is overcrowded currently - any further housing development will exacerbate an already intolerable level of urbanisation.
- Answer depends on the priorities that you order the above in. Some are a lot less of a priority as they can and are being done by private sectors e.g. student housing.
- Low carbon energy should aspire to be No carbon
- The presumption we need more development- we don't
- The university and student population should not be allowed to grow, it is already out of balance with our once small rural market town
- Yes, airy fairy language that provides loopholes for developers
- Healthy eating and drinking - not the role of Planning policy or Development Control. In any case what is a healthy or unhealthy food or drink?
- Accommodation/sites for travellers/gypsies
- Custom and self-build housing
- Stop building on Greenfield Sites and put back into the Greenbelt ALL Plan B Sites.
- Strongly support the retention of all green belt boundaries in West Lancashire
- With regard to areas around Appley Bridge, West Quarry should remain a designated green belt zone; East Quarry, Appley Bridge, could be a carefully planned residential/leisure/nature reserve opportunity with houses built on the rock surrounding the water filled quarry. A similar idea was previously granted planning permission.
- Draining the quarry and building 300 houses is absolute madness as traffic is already a danger; damage to properties on Appley Lane North could be substantial with that many lorries fully laden with waste to fill in the quarry; have already been refused planning but have carried on with some kind of work; this needs to be stopped as it would destroy the village and the dust and waste would be dangerous to residents
- Provision for heavy goods vehicles to access on the A570 onto any of the land from the petrol station onwards to Ormskirk due to high volume of traffic already travelling along this route, there simply isn't the room to accommodate extra traffic turning and exiting off the A570
- Green belt land should not be considered for any development as it is a very precious resource
- No building should be done on any productive farmland whatsoever - only redevelopment of Brownfield sites or pieces of land too small to farm
- Should not allow building of any kind on green belt or farm land under any circumstances; one of 2 areas in the UK with grade 1 agricultural land so this should be protected at all costs. Given the effects of climate change and the need to be more sustainable and self sufficient with food production after Brexit, this land is now more precious than ever; we haven't fully realised the impact on local services and roads of the houses built on Yew Tree Farm, Burscough and on Martlands Farm on A59, as these are not yet finished, and the roads are already very congested.

#### Borough, Parish, Town Councillors / Community Groups:

- The omission of Policy ST02 & ST05 and the potential housing and employment land needs that will be targeted through to 2040
- Building on or using agricultural land for housing use, there is significant supplies of alternative land for that purpose.
- Garden villages are not seen to be desirable developments in the Local Plan.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### 3. Do you have any other comments about the 'scope' of the new Local Plan?

64 respondents answered this question.

#### Residents and members of the public:

- Ensure a more positive and engaging consultation programme especially in relation to housing and communities planning processes - the consultation process led in 2019 was appallingly managed and needs to be better this time
- The schedule for the new plan should allow for revision of the plan after feedback from the public and take this into account before it is approved by the council; this current consultation cannot be considered adequate feedback on the full local plan
- Why isn't protection of green belt at the top of the priorities?
- Green field sites should not be considered as there are plenty of brown field sites
- Protection of green belt should be the top priority
- Green belt areas should not be included and agricultural land should be saved
- The scope needs to have priorities against the issues; no one can make an informed decision without it
- The plan does look to be driving in a green and sustainable direction, also planning development is realistic and is taking into account what West Lancashire is; we have to be bold, we have no choice and owe it to future generation and our planet we MUST go green.
- When large housing development is planned, there needs to be the infrastructure to go with it e.g. roads, schools, medical centres, shops etc
- More affordable houses in places like Newburgh as people who grew up there cannot afford to remain due to lack of affordability
- The plan should consider the financial disbenefit to the Council and council tax payers of student HMOs; students impact the local economy and there are benefits and disbenefits in the make up and structure of towns such as Ormskirk.
- Needs to be a way the Council is able to influence type of new housing proposed possibly to include greater priority to design
- Environmental crisis is urgent - sound environmental policy must be number one criterion in all decisions. Evident in abnormally mild but wet weather we have now and risks that brings - especially of not being able to use our very good soil to grow food as too wet. Also vital need for better public transport for all those who can't walk or cycle and innovative ideas - tricycle rickshaw taxis? Roads are congested and dangerous and pavements also need attention - bad surfaces but also how they are used
- The scope seems to be wide ranging but it should take into account Burscough's Neighbourhood Plan
- Consideration needs to be made this time for residents and the areas they live in. Don't walk all over the beautiful areas people live in to get big money from developers like was planned last time
- There needs to be a lot more help for poor people, what is being offered and suggested isn't enough.
- Climate change and environmental sustainability should be the top priority of the plan, with the protection of green belt second
- Council to produce a declaration of climate emergency. Modify building regulations to ensure all new developments to be eco friendly, roofs to be south facing and solar panels fitted, green and grey water systems SuDS systems to be better than agricultural run-off.
- You only get one chance in making the right decision, don't spoil beautiful Countryside and Greenbelt forever, the General Public will never forgive those in

### Scope, Issues & Options Feedback Report

power if they get it wrong; listen to residents, especially those who live in Aughton and Ormskirk; for the builders, its just another day at the office making huge profits on small houses that are over-priced

- Object to the local plan; Bickerstaffe agricultural farm land is essential for food production especially since leaving the European Union and issues around trading; taking away further green belt/agricultural land to build housing will lead to further issues of population hunger as there won't be enough for essential farming; losing wooded areas and green belt land for housing would have a detrimental effect on climate change as it would increase pollution, traffic congestion and energy use
- Development would put added pressure on services and infrastructure; Sefton have already built on a vast amount of green belt land - by taking away further green belt in Bickerstaffe, you are taking away farmers livelihoods and land needed to feed our country.
- The Government's initiative is to use brown belt, not agricultural land/green belt land but this development goes against the this
- There is a large amount of brown belt land that could be used in the Skelmersdale
- Traffic congestion is a current issue along the M58, M57, M6 and the Ormskirk/Burscough area. Adding further residence at this scale would add to these pressures and add to air pollution.
- Productive Grade 1 agricultural land has been earmarked for business development near junction 3 of the M58 and for development on farmland along the Rainford bypass. This is unethical use of some of the top grade productive farmland in the UK
- Much of the plan is based on out of date data which poses questions about its quality and relevance; data is not information but becomes so through use by planners, so any consultation is never 'value' or opinion free
- The quantity of land cannot be increased but may be degraded easily to become derelict taking the settlement with it; agriculture and horticulture are the major sources of wealth and employment in the area but they do not receive a corresponding mention; the UKs lack of self-sufficiency emphasizes that BMV land must be used exclusively for food production with an absolute ban on its use for any other purpose; the Plan attaches little importance to the certain necessity of food production
- The modest population increase is spread across the different age groups, indicating a need for around 960 new homes but the listed potential building land far exceeds that needed and much of it is Green belt and best and most versatile agricultural land
- The desire to reduce the area's energy footprint is excellent but it requires a deep understanding of where renewable sources, such as wind, PV fit into land use and how the energy footprint of the stock of buildings can be reduced. Does WLBC have capabilities in these fields?
- The Plan expresses a desire to attract businesses without indicating how this would be done or what kinds of businesses are needed. WLBC has limited control over whether companies find West Lancashire an attractive location.
- The influence of the Liverpool Superport on business and employment in West Lancashire is not discussed in this Consultation and remains highly uncertain:
- The purpose of the Consultation is to seek approval of the WLBCs 'preferred option' for embodiment in the New Plan for 2023 to 2030: it seeks to close off the discussion; all consultants and WLBC should be required to identify and publish the sources of data used throughout so that the electorate can verify it
- Throughout the consultation there is a good deal of 'hand waving' and some open admissions that WLBC does not have the necessary expertise or funds to implement the 'Policies' proposed,
- The 'tick-box' Consultation seeks comment on the WLBC's vision for West Lancashire. Like all 'survey' based consultations publics opinion tends to be

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

restricted rather than the professed reverse. It can be summed up as the 'Council knows best' with limited freedom of expression granted to the population

- There is no mention of the effects of COVID 19; of the developing effects of BREXIT; of the possible effects of rising inflation and costs of living; changes that affect the building and construction industry; etc.; there is no financial information in the Consultation: without this a Plan will not be credible. How budgets will be created is crucial information

#### Borough, Parish, Town Councillors / Community Groups:

- West Lancs Borough Council should be able to assist Lancashire County Council in the waste transfer planning applications and to be able to recommend if companies need enforcement notices served. this would provide local knowledge and help to have regular site visits as we recognise the planning office in Lancashire County Council is quite a distance away
- There is a lack of commitment to safeguarding the agricultural nature of West Lancashire
- Development on brownfield sites should be carried out before any other land is used
- Aughton Residents Group (ARG): the group was established in response to the efforts of developers to create large scale housing estates on prime agricultural land in the middle of our community; ARG sincerely hopes it can continue to work with the Council to stop developers dictating the terms of housing development; we appreciate that the majority of sites put forward by developers and land owners will not progress to the preferred options stage so we will seek to respond at a strategic level – the Council should not pursue any development on productive agricultural land, this would fly in the face of the Council's stated ambitions to promote a greener healthier environment and playing its part in the Climate Emergency and be contrary to the NPPF

#### Organisations, including developers, landowners and representatives:

##### PWA Planning

- The plan should look to meet the needs and change as said needs adapt. The provision of both employment and housing land should be seen as minimums and not as maximums.

##### Satplan for Gleeson Homes and Stewart Milne Homes

- The Scope is comprehensive and reflects our experience and understanding of the issues in West Lancashire;
- Encouraging to see reference to updated housing requirements, the ageing population and the need for additional elderly accommodation
- Agree there is a need for significant economic growth which will attract younger economically active households, making a valuable contribution to the competitiveness of West Lancashire
- To ensure economic growth is achieved it will be imperative to ensure the correct quantum, type and location of new housing

##### Edge Hill University

- EHU generally supports the proposed scope of the Local Plan but notes a significant amount of evidence is missing from this consultation exercise, such as the Housing and Economic Development Needs Assessment ("HEDNA"), a review of the Borough's Urban Capacity, and a review of the Green Belt boundaries – these are crucial facets of evidence on which to form judgments on the spatial strategy,



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

development needs and its distributions, site allocation and policies; It important that whilst seeking views, the Council does not predetermine the outcome of these critical pillars of the evidence base, and that the Local Plan is informed by robust evidence that supports a deliverable and sustainable Local Plan to 2040. EHU will share its own evidence with the Council to inform the evidence base and content of the Local Plan.

#### Emery Planning on behalf of Wain Estates

- The decision to pursue a significantly shorter plan period, to simply fulfil the Framework's minimum 15-year requirement is a negative step. The key benefits of a longer period, as identified by the Council, will not be achieved
- The proposed plan period for the Local Plan is 2023 to 2040; this means for the strategic policies to cover at least 15-years from adoption, it must be adopted by 31 March 2025. The current timetable is unlikely to be realistic, considering the almost inevitable need for main modifications and further public consultation and it would therefore be sensible at this stage to consider extending the plan period to say 2042 to provide inbuilt flexibility to deal with any delays
- A housing requirement higher than the standard method should be pursued, in line with NPPF; the examples listed by the Government to do so closely mirror the circumstances in West Lancashire - in particular, there is a need to secure economic growth, and to align housing and economic strategies and whether it is necessary and/or appropriate to help to meet any unmet needs from the Liverpool City Region and neighbouring Sefton where constraints to meeting housing needs have previously been identified.

#### Smith and Love on behalf of Mr David Hill

- Support the proposal to restructure and amend Policy RS1 of the adopted Plan and include a Rural Exception Sites policy (which should be a specific stand alone policy); which can be comprehensively and clearly set out, and which is written to take account of the location, needs and opportunities for each of the villages, and clusters of villages.

### 3. A Portrait of West Lancashire

#### **Questions:**

#### **1. Do you have any comments on the 'Portrait of West Lancashire'?**

#### **Skelmersdale with Up Holland**

- *17 respondents made* comments in relation to Skelmersdale with Up Holland.

#### Residents and members of the public:

- Detail on Up Holland is very scant and the portrait of Up Holland is likely to be very different to Skelmersdale in terms of demography, transport links, car and housing ownership, educational levels, employment and housing stock
- Why aren't all new builds in Skelmersdale zero carbon?
- Skelmersdale has a bigger population than Ormskirk and more new housing but fewer facilities; Upholland is similar to Burscough but with fewer facilities; they are misrepresented in the hierarchy

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Skelmersdale Concourse has been left to decline for too long, better facilities would improve lives; more houses equals more cars and Hall Lane is already an extension of the M6 as well as a death trap.
- Need to consider education and library provision
- No mention of drainage problems - county road to Hurlston Brook should be improved

#### Borough, Parish, Town Councillors / Community Groups:

- Council should cease referring back to plans made in the 1950s/60s for Skelmersdale to grow to a population of 80,000, when housing density had been far greater than has since proved acceptable e.g. for modern car parking standards and developments have since proved to be socially divisive
- Do not look at continual growth of housing and commercial demands (which have often proved to be based on excessive forecasting) but live within overall needs of this area, emphasising dependence on nature, rather than hurtling towards flooding, food shortages
- By the time the new Local Plan is in place, the population of this Parish will have more than doubled, taking out once-productive farmland
- No account has been taken of an ageing population
- Council has failed to build homes in the town centre by abandoning plans to build flats over new retail units and by sterilising too much brownfield land in pursuit of a new railway station; the station should not take up the whole site area which used to be Glenburn School
- Villages should have the ability to grow but Green Belt is enormously important and any changes to allow development should be small scale and proportionate
- Up Holland is over developed, lacking in amenities and encourages car travel in a climate emergency
- Traffic is increasing all the time, and congestion and traffic hold-ups are getting worse due to the volume of traffic using roads from increased development.

#### Organisations, including developers, landowners and representatives:

- Should have a greater focus on opportunity to improve the vitality of Up Holland as a local service centre; appropriate housing development to serve the village could provide critical mass to boost vitality and viability; surprised there is no reference to St Joseph's College in Upholland, a very significant heritage asset identified by the Council as being a Building at Risk
- Much employment in Skelmersdale is in declining industries reflected in the type, quality and quantity of available employment land and premises – there is a need for the Plan to create and deliver growth opportunities for Skelmersdale to achieve its vision of becoming a regenerated, re-invented and commercially-attractive town and business location for major new employment and jobs
- Green Belt review should be carried out to release more land for employment, particularly to south of M58; implied level of constraint caused by Grade 1 and 2 agricultural land should not be overstated
- Skelmersdale is where most growth should be directed; a site to north of Beacon Lane on land associated with Whalley Farm represents an appropriate location for housing growth in a highly sustainable location within walking distance of services and public transport; the site offers the opportunity to deliver significant housing numbers whilst protecting more open greenfield and Green Belt sites

Savills on behalf of Harworth Group Plc

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Locating new employment opportunities adjacent to higher population and high unemployment areas will provide jobs in the most sustainable locations; the Authority must be proactive in planning to deliver a significant quantum of employment floorspace, creating a continued and enhanced supply of jobs for the local working age population
- Significant opportunity exists to position industrial and warehousing employment uses towards the south of the Authority. Options for strategic employment-led development to the south of Skelmersdale should therefore be considered in detail
- Rotherham's Green has the potential to deliver up to 9,600 permanent new jobs and contribute £291 million to the local economy within an exemplar environmentally friendly employment-led strategic development

#### Statutory consultees and other organisations:

##### Environment Agency (EA):

- It is outside EA's remit, but correspondence has been received on surface water flooding issues in Skelmersdale and the capacity of the existing drainage infrastructure; flooding from surface water in Skelmersdale may need further consideration

##### Historic England

- Should include a proper description and assessment of the historic environment in the Borough and contribution it makes to the area (NPPF, Paragraph 169); should describe historical growth, identify historic environment and clearly identify the character and identity of different places and their contribution it makes to all aspects of life in Borough

##### CPRE – the Countryside Charity

- The town needs revitalisation, and brownfield land should be used for development in advance of greenfield land.

### Ormskirk with Aughton

- 11 respondents made comments in relation to Ormskirk with Aughton.

#### Residents and members of the public:

- No sports or leisure centre in Ormskirk, only Park Pool; nearest sports centre is Burscough but bus service is very poor and no safe cycle route
- Ormskirk would greatly benefit from more leisure facilities for the youth e.g. drop in centre similar to that in Skelmersdale
- The long delays with improvements to road transport in Ormskirk by Lancashire County Council are a significant drag on the town.
- Proposals to restrict the road in Derby Street to one lane are ridiculous. A pedestrian walkway should be installed as has been done at other local crossings; the bridge reinforced and maintained as a two way highway.
- Stronger measures needed to discourage car use for local travel and to make walking and cycling in and around the town centre safer and more attractive
- Cycling levels are very low in the borough; as a university town this should be altered significantly; continuation of the cycle lane down the A59 into Ormskirk would be easily achievable and most welcome; cycle lanes and crossings connecting Edge Hill University and train station are really good
- Need better rail and cycle links between Southport and Ormskirk

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Need evidence on state of current student HMO [Houses of Multiple Occupancy] market; How many HMOs are underoccupied or empty? How many have returned to C3 [dwelling house] use?
- More student accommodation is needed to free up housing for young families and first time buyers who struggle to afford houses in Ormskirk; also need more affordable accommodation including flats, for those who wish to rent and buy
- Population increasingly polarised with increasing numbers of elderly as well as students who are reducing housing available for younger families
- Not opposed to new developments: young people and key workers needs places to live but development needs retail and other amenities to go with to reduce car use;
- Needs to make more use of proximity to Liverpool – need to emphasise benefits of being semi-rural with proximity to a big city
- The rural settlements suffer from flooding and this is set to worsen with impacts of the climate emergency

#### Statutory consultees and other organisations:

##### CPRE – the Countryside Charity

- Recent development needs more supporting infrastructure to tackle congestion and flood risk. The University should not be expanded into Green Belt, which is of value to the rural economy
- Neighbourhood plans would be a way to support local character and decision taking in the future
- Rural local road network is completely unsuitable for HGV traffic and despite local communities raising the problem, the Highways Authority seems unable to enforce speed limits and weight restrictions

##### Burscough

- 14 respondents made comments in relation to Burscough.

#### Residents and members of the public:

- No more large scale development allocations in Burscough
- Further incursion into Green Belt should be resisted, particularly given availability of brownfield sites
- Drainage and flooding is a big concern / Surface water flooding is now a regular occurrence
- HGVs and speeding traffic through the village is a concern
- Increasing development is putting pressure on services
- Burscough is over-developed and this has overloaded infrastructure and services
- Public transport links to local towns is poor and frequently unreliable due to the increasing traffic congestion, public transport should be improved to encourage people out of their cars;
- Evening transport is very poor
- Provision for cyclists needs to be improved to encourage more use for local journeys.
- Life in Burscough is adversely affected by over development due to traffic and HGVs, making roads unsafe for pedestrians and cyclists; access to green belt land is a key factor in making Burscough an attractive place to live
- Object to plans for future development in Burscough; it needs to maintain its heritage and open spaces to maintain its attractiveness
- UBH site would be a perfect place as a park

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Scale and pace of development within the area is shocking; area cannot cope with the new housing being built -increase in traffic, flooding, pollution, rubbish, pressure on services. Further developments will affect the character of the village and become one enormous housing estate forming a mass of poorly constructed properties
- It is strange that so much development is concentrated in such a small town; this would not happen in Aughton
- Housing needs for Burscough have already been met by the development of Yew Tree Farm; there should be no more development
- Further development in Burscough needs to stop immediately
- Over the last 5 years considerable flooding has occurred to my front and back gardens and this is happening across Burscough on a substantial scale
- Services are under extreme pressure
- Public transport is poor
- Residents of the new Redrow development are already experiencing flooding issues as short cuts have been made to the original plan and not ratified by the planning approvers / building regs.
- Significant concerns over flooding and drainage which will be exacerbated by climate change  
Infrastructure of the town / drainage systems needs improving significantly over the next 10 years and then from 2032 developments should be considered on a managed basis
- Burscough has been subject to far more than its fair share of development in recent years and has changed beyond recognition. Any further development would not be for the current residents of Burscough as there is currently sufficient housing in place or under construction to cater for them already

#### Organisations, including developers, landowners and representatives:

- Burscough is a key service centre and a sustainable settlement; issues listed should not be seen as development barriers; non-green belt sites may help its further growth on a proportionate basis.

#### Pegasus Group on behalf of Bloor Homes:

- Important to note that the town itself is served by two train stations and there is also a third station close by at New Lane.

#### Lichfields On behalf of Crompton Property Developments Ltd:

- The Portrait identifies flooding and drainage as being a main infrastructure concern for Burscough, despite no part being located within Flood Zone 2 or 3. Concerns largely stem from capacity issues at the New Lane Wastewater Treatment Works; development at Yew Tree Farm has helped to address some of the existing issues with local drainage infrastructure and has helped to reduce overall risk of flooding. There is an opportunity for further development to deliver additional infrastructure improvements that will further assist capacity issues in the local drainage infrastructure.

#### Statutory consultees and other organisations:

##### Environment Agency (EA):

- Sewerage capacity and surface water management issues exist in Burscough; the Council is working with United Utilities (UU) to ensure existing problems are not made worse as a result of new development; the Lead Local Flood Authority

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

(Lancashire County Council) also has a role to play in advising planners on the management of surface water from major development and EA recommend liaising with them and UU where surface water drainage issues exist.

#### Northern Parishes

- 9 respondents made comments in relation to The Northern Parishes.

#### Residents and members of the public:

- Banks relies on access to services in Sefton; not a great distance to travel but the lack of a cycle path between the Plough roundabout / roundabout at junction of the A565 / Guinea Hall Lane isolates cyclists from accessing Southport safely.
- Residents avoid the junction of the A565 / Station Road (adding extra miles to journeys an increasing carbon footprint) due to volume and speed of the traffic; this junction is extremely dangerous
- Existing housing badly affected by the increased volume of traffic. Noise and congestion affecting existing homes should be considered and protective measures should be put into place e.g. a noise reducing fence along the embankment on this stretch of road would reduce additional impacts.
- Area contributes greatly to UK food requirements; development will mean this is lost forever and this shouldn't be allowed;
- Improvements to public transport need to be made, but large scale employment such as large office blocks or warehouses should be avoided given the nature of the area.

#### Organisations, including developers, landowners and representatives:

On behalf of Melford Construction Ltd.:

- Much of the area around Banks is zone within Flood Zone 3 but on the assumption that the 400 year old sea walls are not in existence. They are in existence and have allowed Banks to be developed. Developers have proved that sites do not flood and recent housing development has taken place. New houses will be no more at risk than those recently developed and there is scope for more development that will support employment, retail and community services

PWA Planning on behalf of Applethwaite Homes:

- Hesketh Bank is an appropriate location for future housing growth, it is a sustainable location with a variety of services available
- The further range of services in Tarleton are well connected to Hesketh Bank via Hesketh Lane and bus services from Moss Lane which also access Southport and Preston

Tarleton Estates and Lilford Estates:

- Lilford Estates have provided information in support of the development of:
  - Site 1: Hesketh Lane North
  - Site 2: Hesketh Lane South
  - Site 3: Coe Lane
  - Site 4: Southport New Road North
  - Site 5: Liverpool Road South; and
  - Site 6 Southport New Road South
- Lilford Estates have made the following comments:
- The above sites were subject to an extensive masterplanning exercise, including comprehensive assessment of technical considerations; the sites are deliverable and

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

would generate significant benefits subject to review of Protected Land and Green Belt

- The Estate's vision for its landholdings at Tarleton is to create attractive, high-quality development which complement the village's existing built form
- Appropriate mitigation will be delivered to address any concerns and to limit the effect on and protect the character and appearance of the surrounding landscape. Acute need to deliver new employment/ retail development in Tarleton following years of under delivery, due to a policy focus on Skelmersdale, Burscough and Ormskirk, constraining economic growth and opportunities for local businesses to expand; essential that more employment land is allocated in Tarleton

#### Statutory consultees and other organisations:

##### Environment Agency:

- Issues on the Alt Crossens catchment regarding the pumped drainage system; flood risk affects more than the settlement of Banks, it affects large parts of the rural area used for agriculture and horticulture; risk to the whole area should be acknowledged
- Tarleton and Hesketh Bank have experienced sewerage capacity issues and impacts of any additional development in these areas may need require further consideration / investigation.

##### CPRE – the Countryside Charity

- Northern parishes, such as Rufford, have nature reserves that need to be enhanced in the future. They are threatened with flooding and traditional farm businesses increasingly seek industrial type sheds for operations that harm Green Belt purpose and the five functions.  
Flood risk is a genuine problem.

#### **Eastern and Southern Parishes**

- 13 respondents made comments in relation to the Eastern and Southern Parishes

#### Residents and members of the public:

- Area contributes greatly to UK food requirements; development will mean this is lost forever and shouldn't be allowed
- If the country wants to feed itself, farm land will be at a premium and it is at this moment overworked
- Improvements to public transport need to be made, but large scale employment such as large office blocks or warehouses should be avoided given the nature of the area
- Lathom South has a large proportion of retired people
- Many concerns about poor infrastructure e.g. electricity, gas, communications, poor state of roads and pavements
- Although not listed as an area of flood risk there is road flooding and foul water disposal issues, into the River Tawd and via Westhead sewerage treatment works; It is a rural area and major housing development was roundly opposed in the abandoned Plan - it would be equally roundly opposed this time
- The A5209 is increasingly busy, being used as access to the M6. The canal bridge causes congestion
- HGV access from farms/ nurseries of northern parishes and from new warehouses of Stanley (and 2 new ones) will make things worse

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Green belt boundaries need protecting, particularly in Appley Bridge; infill should allow small scale development during the life of the plan
- West Quarry, AB should stay in the green belt / East Quarry should have a clear defined use to protect the community. Previous permission was granted for floating housing, so this site could be redefined for residential/ housing usage
- The Pad should go back to green belt; it has been used as an illegal dump for the last 5 years
- W.L.B.C has tried to build on green belt in Appley Bridge for the last 50 years – this has always been rejected due to flooding which will be worse if more houses are built
- Wildlife has already been decimated
- A recent survey reported a drop in the working population and that if it continues a serious deficit will occur
- We would hope our grandchildren could have a better environment to live in not worse
- Disappointed that Appley Bridge is again seen as somewhere to build housing; bordering on harassment that, annually, developers try to build on green belt; last project was denied due to detrimental effects of development on surface water, drainage, flooding, air pollution, traffic safety and woodland habitat. Given climate issues, more housing will exacerbate existing problems. Future building on green belt, especially in Appley Bridge, should be dismissed; however, it is laudable that 2040 plan recognises need to redevelop areas such as Skelmersdale concourse; brown field sites and improving urban areas will address socio-economic pressures e.g. lower cost / energy efficient housing in such areas will help with social housing, fuel poverty and access to facilities, helping service industry to grow and provide jobs. Building large, expensive, detached but developer friendly houses on green belt is not a sustainable solution to future pressures in the Borough

#### Borough, Parish, Town Councillors / Community Groups:

- Appley Bridge (AB) is one single community; the population of Appley Bridge is approximately three times that of Parbold. However planning policies applied in previous Local Plans categorise AB as significantly smaller than Parbold; application of planning policies, as if AB was a small / rural village is unfair.
- West Quarry should remain in Green Belt; East Quarry, Appley Bridge, could be a carefully planned development/leisure/nature reserve opportunity with houses built on the rock around the water filled quarry. A similar idea was previously granted planning permission.
- Rationale for bringing the Eastern and Southern parishes appears inappropriate; they have different landscapes and environments and will require distinct considerations; the Northern areas have good public transport services and access to local community facilities that far exceeds Bickerstaffe, Lathom, Lathom South and Simonswood in the Southern area; Simonswood is largely occupied by waste management sites and adherence to controls and measures to protect residential amenity have not been enforced and the sites cause many problems for local communities; Local Plan should consider separating the portraits of the Eastern and Southern Parishes into individual areas.

#### Organisations, including developers, landowners and representatives:

Comments made by Stephen Abbot Associates on behalf of the owner of Strawberry Fields, Newburgh:



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- The site remains available for development and provides an opportunity to provide much needed housing and new services, although only the eastern portions would be released for development in the short- term. An indicative masterplan has been provided
- Parbold and Newburgh are treated separately but they should be a “coupled” settlement, enabling greater levels of growth (appropriate to the combined settlement) which could also provides affordable housing (in an area where affordability is an issue); there is a clear need for housing within the Eastern Parishes, which should be supported by provision of additional services
- Current spatial strategy directs 3.5% of the proposed housing requirement to the Eastern Parishes, significantly below the current amount of households/housing stock which creates a skewed spatial distribution
- Delivery of housing in the Eastern Parishes has been significantly constrained by tightly drawn Green Belt boundaries NPPF para.s 140-143 states a need to identify safeguarded land between the urban area and the Green Belt.
- With additional housing, there will be greater opportunity for under-utilised employment land to be developed, further supporting the sustainable development of Appley Bridge and the Eastern Parishes.

Comments made by Lichfields on behalf of Taylor Wimpey:

- The Portrait identifies access to affordable housing, provision for elderly people, lack of accessibility to transport and key services within rural areas as key concerns. The shortage of a variety of business premises is holding back provision of local employment and acknowledged that Appley Bridge has had limited development or take up of land for employment.
- Agree with the assessment that there is a clear need for housing and where possible this should be supported by provision of additional services; delivery of housing has been significantly constrained by tightly drawn Green Belt boundaries.
- Additional housing in Appley Bridge will allow for currently under-utilised employment land to be developed, further supporting sustainable development
- Appley Bridge, with its already established transport connections and existing services, provides an opportunity to support growth within the Borough. Taylor Wimpey's sites at Appley Bridge deliverable and will contribute to meeting the housing requirement

#### Statutory consultees and other organisations:

CPRE – the Countryside Charity

- Eastern and Southern parishes are isolated due to lack of public transport and are threatened by flooding
- The lack of 'genuinely' affordable housing is a problem, particularly in older age groups

#### **Western Parishes**

- 9 respondents made comments in relation to The Western Parishes

#### Residents and members of the public:

- Public transport to Ormskirk is very limited and this needs urgent attention
- Agree completely about possible isolation for elderly people
- Concerns about plans to close pumping stations

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Contribution area makes to UK food requirements should not be taken lightly, once prime agricultural land is developed, it is lost forever
- Impact of flooding needs to be borne in mind

#### Organisations, including developers, landowners and representatives:

- The following additions and alterations should be made to the proposed text: Western Parishes have a clear physical and functional relationship with the settlement of Southport; Western Parishes rely on Sefton for access to facilities and there is a strong economic link between the boroughs for employment; Sefton periphery within Western Parishes is a highly sustainable location for new housing growth
- Western Parishes have become increasingly unsustainable over time as they have gradually lost local services, bus services have reduced, younger people and families moving away and there is an ageing population.
- The spatial portrait of the Western Parishes must also identify solutions and not become overly-negative
- NPPF Para. 78 requires rural local planning authorities to devise policies which are responsive to local circumstances and support housing
- Opportunities to bring rural exception sites forward, providing affordable housing to meet local needs should be facilitated, with consideration whether allowing some market housing on the site sites would help to facilitate this
- Further population growth will help increase and sustain bus services; development in the Western Parishes can be sustainable and should be achieved by making appropriate housing site allocations or extending settlement boundaries, or in the absence of any Green Belt changes, a permissive Rural Housing Site Exception policy.

#### Statutory consultees and other organisations:

##### Environment Agency:

- Local Plan should strengthen wording on need for future changes to address sustainability issues, flood risk and water quality in accordance with The Environment Bill, Flood and Coastal Risk Management Plans, and the England Peat Action Plan
- The impacts of changes to pumping on the catchment described are not solely related to flood risk
- Human intervention for drainage purposes has caused peat wastage and land level changes in the surrounding land. Frequent channel maintenance of these heavily modified watercourses is now difficult, and breaches and seepages of perched rivers is a growing issue. Maintenance costs are rising and the need for repair is becoming more frequent
- A Lowlands Agricultural Peat Task Force has established subgroups and the North West subgroup is in the process of agreeing recommendations to government to identify options. West Lancashire has a significant amount of peat and soil levels have dropped as the land has oxidised and broken down through cropping. In addition to degrading soils, this process also releases a significant amount of carbon. The taskforce is exploring management options for landowners that support farming and the wider environment whilst adapting to the flood risk and climate change.

##### CPRE – the Countryside Charity

- Western parishes also suffer from isolation
- There are peat deposits that must be conserved to properly provide carbon sequestration benefits

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- The Alt Crossens pumping arrangement is to be changed and there is concern over the flooding of high-grade farmland, due to harm to business viability
- Farmland of high quality should be protected so future generations can grow its own food
- Environmental designations and land that supports important ecology should be conserved and enhanced by the local plan

### Trans-Pennine Trail

- Cheshire Lines is part of the national Trans Pennine Trail providing over 370 miles of route; West Lancashire section provides a key link between Sefton and Liverpool and is part of the National Cycle network. Vital that the Council recognise this to ensure importance of this national connection is recognised to attract investment. Can be used for leisure and commuting, e.g. to employment sites within neighbouring authorities.

### Social and Demographic Matters

- 17 respondents made comments in relation to Social and Demographic Matters.

#### Residents and members of the public:

- People are aware that there are increasing numbers of elderly but few would appreciate the scale of increase described
- Demand for services will be considerable, and the imbalance between demand and supply will force up costs that will have to be borne by public authorities and users;
- Effects of the pandemic and Brexit on population projections must be factored in and 2021 census used as soon as available; to say "Between 2001 and 2011, the proportion of households who rented privately increased by 69% whilst the proportion in social rented tenure decreased by 8%." - information this dated should not be used in determining a new plan - it should be updated.
- New housing must be carbon neutral due to the Climate Emergency; smaller homes could be built which would be more affordable; many houses in Aughton are oversized
- Need more flats for people other than students e.g. Young employed.
- Need to look at how much "affordable" house prices are and ways for young people to get onto the housing ladder without part-ownership schemes; in Burscough there are lots of houses for sale on the Yew Tree Farm for well above £300,000, but who is able to afford those prices on today's wages, especially young people as finding a deposit is unrealistic. Private rents are also very high and people need help.
- Has any work been done to look at likely demand for self- and custom-build? I should imagine it would be fairly low;
- Where is the evidence for demand for accommodation in caravans and houseboats? It is the opposite, many people who have this type of accommodation are looking for houses. Need to do an exercise with the Council's Housing Options team to truly establish the situation
- Statistics on population do not recognise that people die or become more dependent on specialist accommodation. It is not explained how over 75s population will rise from current levels. If the number of working age people declines, it assumes that the child bearing percentage of that declining group will produce more children. What evidence is there to support this?
- There is a statement about poor public transport which excludes Bickerstaffe but the only route that is actually served by regular buses is the corridor from Skelmersdale to Ormskirk. There is no rail link and most roads are poorly maintained,

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

narrow and over-used. Pavements, where they exist, are narrow, poorly maintained and require frequent road-crossing to walk any distance. Cycling and pedestrian activities are severely constrained by carriageway conditions. The summary ignores these points.

- Unconstrained growth of Edge Hill still seems to be the Policy, in spite of the strains it places on Ormskirk and on much of West Lancashire, including Bickerstaffe.
- Average house price in the area was £185k but little evidence anywhere outside Skem for that money - even there very little under £100k and even fewer new builds under £150K; WL data shows high levels of private ownership, therefore surprised by stats for rental
- Greater variety of housing needed other than bog standard developers supply. WL slow to adopt Government requirement to supply serviced self-build plots in a variety of locations; the register doesn't echo need
- Looking at these figures, it seems that we need to improve bus services; should encourage younger people to live and work in West Lancs by providing affordable housing; better GP provision is required for the ageing population
- Vital we maintain good agricultural land in order to feed ourselves as a nation. Recent fuel prices have highlighted the problem with relying on imports.

#### Borough, Parish, Town Councillors / Community Groups:

- Section 8 data is not current and inconsistent with Local Plan timeframe; data from the 2011 census does not provide adequate baseline for 2022 and does not portray the best picture of demographics in 2021/22; more up to date figures may be available when the new HEDNA is published and so likely that this whole section will need to be brought into line with updated data
- A matter of concern that the portrait which uses old data is being used to influence and define Policy Areas and Approaches presented in the Issues & Option
- 8.24 provides a superficial commentary on road infrastructure and fails to recognise unsuitability of rural road networks feeding from M58 & M6 (M6 does not pass through West Lancashire) and increasing traffic volumes and congestion arising from development that has already taken place during timescale of the current Local Plan.

#### Organisations, including developers, landowners and representatives:

- Given the rural nature of the area, the new Plan must recognise needs of rural communities. Disparities in demographics between urban and rural populations must be identified and accounted for to ensure that these settlements do not become isolated, ageing, imbalanced and unsustainable populations. Must make opportunities for young professionals and families to stay in these rural areas; this can be achieved by identification of small and suitable housing allocations in the most sustainable villages complemented by permissive policies for rural housing

Savill's on behalf of Harworth Group:

- For the purposes of the geographical portrait, the site at Junction 3 of the M58 (SHELAA 2021 site BK.030) falls within the 'Eastern and Southern Parishes' area, which excludes the urban areas of Skelmersdale and Up Holland situated to the SE
- Eastern and Southern Parishes has combined population of over 10,000 existing residents, and Skelmersdale and Up Holland, 42,000 residents. The south and south-therefore currently supports around 52,000 existing residents (around 47% of the population)
- A large portion of the population is clearly situated towards the south of the authority area close to the main settlements of Skelmersdale, Up Holland, and Ormskirk,

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

mirroring pattern of unemployment rates across the Borough, and the positioning of new employment adjacent to existing higher population density and unemployment rate areas, will provide jobs in the most sustainable locations

- Clear that the demographics of Skelmersdale and Up Holland necessitate need for both employment and housing land uses to come forward in adjacent areas and / or with a critical mass to viably support provision of new or improved infrastructure including public transport
- Portrait identifies average house price in the area as higher than the Lancashire average, is forecast to see an increase in the older population, and reduction in working-age households, with anticipated outward-migration of working aged households; therefore the Authority must be proactive in planning to deliver a significant quantum of employment floorspace, creating a continued and enhanced supply of jobs
- Rotherham's Green has potential to deliver up to 9,600 permanent new jobs and contribute £291 million to the local economy
- Given existing distribution of the population is focused towards the south with the greatest levels of unemployment also situated within Skelmersdale towards the south, significant opportunity exists to position industrial and warehousing employment in this area
- It is also essential that specialist accommodation, such as over 55s bungalows, are provided at sustainable sites to meet needs and should develop policies to support this to ensure demand is met in the long-term

PWA Planning on behalf of Applethwaite Homes:

- Should also support homes which are accessible and fully adaptable to meet the needs of elderly residents, meeting Part M(4)2 of Building Regulations, ensuring elderly residents can live in their own homes for as long as possible and reduce the strain on health facilities.

#### Statutory consultees and other organisations:

CPRE – the Countryside Charity

- New plan must not have an excessive requirement, due to the problems CPRE shows in the 'Set Up to Fail' report. Government has a clear mandate to focus on towns and cities and the Standard Method identified a Housing Requirement of 193 dwellings per annum (dpa), but the adopted plan sets a target of 324 dpa; the Housing Delivery Test 2021 shows that over the past 3 years 1,394 homes were completed when only 513 homes were required so delivery has outperformed by 272%
- New plan should cater for local housing need and avoid an inflated requirement. It ought not to compete with surrounding urban authorities that have brownfield in need of reuse.
- In rural areas, genuinely affordable housing is needed at a size and tenure to meet local needs, and not larger family / executive homes for maximum profit, leading to more people commuting long distances into Liverpool, Greater Manchester and beyond. Increasing car dependency is inappropriate and not sustainable. Government cuts have led to fewer bus services across Lancashire with rural services disproportionately affected

### Economic Matters

11 respondents made comments in relation to Economic Matters

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Residents and members of the public:

- Regrettable that no reference to Up Holland's local centre and its relative vitality. It has a range of services but vitality could be improved, through a recognition that appropriate housing development would provide a stronger local customer base to support services
- Given the nature of area, surprising that agriculture is only worthy of one sentence – this may not provide significant "employment" per sq.m. but its importance to the UK should not be underestimated. Once lost to development, it is a permanent loss to UK food production. The contribution that West Lancashire makes to meeting our food requirements shouldn't be overlooked but the consultation does not appear to place any particular importance on this which is very concerning
- Need to focus on industries that retro fit housing with green technology as a priority to tackle climate change and help local employment, will require local training and college courses
- It would be good if a major clothing retailer could be encouraged to Ormskirk or more independent businesses would be welcomed; should encourage modern innovative businesses and liaise with local education to ensure training with the necessary skills
- Over-reliance on warehousing provision means that the area is also over-reliant on road transport, with consequential damage to the environment and road safety. Home working is constrained by very poor and vulnerable communications in large parts of Bickerstaffe but home working has limitations and is not a panacea for future working population
- Commuter flows could be greatly improved if Burscough curves were re-opened and Merseyrail network looped to Southport (giving better links to Wigan, Manchester and Preston)
- Less warehousing, this is land hungry with low skill low pay. Develop at White Moss further and bring/ incentivise more office jobs to Skem
- Improve / create cycle path to link Edge Hill to Skem and direct EH to engage/ invest in Skem instead of just Ormskirk/ green belt. The payoff would change attitudes and perceptions
- Desirable to attract more technical and professional industries to the area.

#### Organisations, including developers, landowners and representatives:

- References to the economy and employment base in Skelmersdale should be linked to make clear that while it remains a significant employment destination, this is by being heavily dependent on traditional industry and manufacturing, which are predicted to decline
- The Plan needs to create and deliver growth opportunities for Skelmersdale to achieve vision of a regenerated, re-invented and outwardly better-positioned and commercially-attractive town and a business location for major new employment and jobs growth, to which businesses and investment can be attracted and retained

#### Statutory consultees and other organisations:

##### Environment Agency:

- Agricultural and horticultural employment will be impacted by the England Peat Action Plan (May 2021) that will ban horticultural activities on peat from 2030 as we must accelerate the switch to alternative land uses. Government is introducing new funds e.g. Nature for Climate Fund and Nature for Climate Peatland Grant Scheme

### Scope, Issues & Options Feedback Report

and stakeholders are encouraged to work with the combined DEFRA agencies to investigate opportunities

- Infrastructure constraints may not prevent development now but important to ensure potential pressure from new development can be suitably managed e.e. use of SUDS to reduce surface water pressure in areas where capacity issues exist or are expected to arise due to climate change
- Note that the document indicates no water availability issues that would prevent development, though water pressure issues in the northern parishes are identified. Water resources are not considered more broadly and water supply only appears to refer to the United Utilities public supply. Water is also used from other sources (i.e. private abstractions) and climate change expected to affect these. Environment Agency regulates abstractions, and are reviewing water availability in the catchment; until this is complete, new applications for abstractions are being limited
- More sustainable practices such as trickle irrigation and above ground storage lagoons are likely to be required. Other advantages could include reducing pressure on public supply and financial benefits over the longer term.

### Transport and Infrastructure

16 respondents made comments in relation to Transport and Infrastructure

#### Residents and members of the public:

- Surprising there is no specific reference to how proposed development should contribute towards infrastructure. Currently managed through site-specific contributions (such as s106 and s278 agreements) or via CIL
- Adopted CIL Charging Schedule is out-dated and needs a timetable for formal review and introduction of a Discretionary Relief and Exceptional Circumstances policy as advocated in the Council's evidence to the CIL Examination
- Bus services between Ormskirk and Burscough Bridge (rail station, sports centre) are inadequate, and no safe cycle route between the two
- Action needed to encourage active travel / discourage car use for short journeys in Ormskirk
- Expanding capacity on Ormskirk to Preston single track train line would allow more frequent services
- Amazing Skelmersdale is so poorly served by train services but question if the proposed station will have the impact wished for; use of Council Tax Payers funds needs to extend beyond just providing shiny new facilities - careful consideration to be given to onwards management
- Proposed train link with Skelmersdale will be a massive boost for the area and will help to reduce car reliance.
- What consideration has been given to the environmental impact of any new rail links for Skelmersdale?
- More cycle lanes would encourage higher cycle use - especially on the A59, St Helens Road and Southport Road.
- Drains across the borough are unable to cope as there are significant blockages - need major work otherwise will be the cause of home flooding
- Public transport needs to be Improved, with exception of Merseyrail which offers a good and reliable service; much more needs to be done to improve environment and biodiversity which is very poor; dearth of woodland in the area and more trees and hedges needed

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Consideration needs to be given to the WWTW upgrade as human waste disposal needs to be changed to a compostable system and sustainable waste water management needed
- Unbelievably complacent view of infrastructure provision within the Borough. Health services are poor, roads are not "good", telecommunications and electricity supplies area poor and vulnerable to damage and much of area has no mains sewerage
- Encourage Aughton & Ormskirk elderly to reduce reliance on cars and buses that they don't want to use anyway for lack of quality, security, high costs, un-social behaviour and use Merseyside facilities, assisted by the Free Rail Travel for the over 60's, which should be extended to West Lancs
- WLBC should continue to lobby Lancashire County Council to provide decent public transport in the borough
- It is hoped that Merseyrail will return to a 15 minute service.

#### Organisations, including developers, landowners and representatives:

Smith and Love on behalf of I and J Hill Partnership:

- Specific reference should be made to emphasise locational advantage of Skelmersdale relative to the national strategic network. Its proximity and high level of accessibility to the M6 via M58 junctions and the opportunities to attract business should be made clear.
- Should be highlighted that, as the largest town and focus for regeneration and employment, and housing investment Skelmersdale does not have a railway station and cannot be adequately served by the station at Up Holland

PWA Planning on behalf of Applethwaite Homes:

- Council should enable elderly residents to be cared for at home and retain independence; can be achieved by ensuring an adequate supply of specialist homes for older people which meet Part M4(2) of building regulations

#### Statutory consultees and other organisations:

United Utilities

- United Utilities note that some comments relating to water supply and wastewater are not up to date.

Trans-Pennine Trail

- No mention of sustainable transport or key connections which should include reference to the Trans Pennine Trail. It is essential that this is included to demonstrate West Lancashire's commitment to sustainable transport and Trans Pennine Trail.

### Natural and Built Environment

16 respondents made comments in relation to The Natural and Built Environment

#### Residents and members of the public:

- Viability implications of environmental policies should be tested to ensure that it does not prejudice to deliverability
- No expressed intent of how Plan will seek to preserve and enhance these assets, or any specific interventions that would promote those objectives



### Scope, Issues & Options Feedback Report

- Should set out an ambition to reduce number of Buildings at Risk and promote policies to give considerable positive weight in the planning balance exercise
- This approach could assist delivery of projects to secure improvement and active use of heritage assets designated as Buildings at Risk, especially that might require appropriate enabling development to facilitate delivery
- Absence of hedgerows in many areas is concerning; they are important for biodiversity, can reduce flood risk and act as a wind break to prevent erosion. Planning policies should encourage reintroduction of hedgerows, in rural and urban areas, and should protect those that remain
- Importance of West Lancashire to UK food production needs to be given highest priority. Once our quality food producing land is developed it is lost forever to the UK
- Block tree planting should be avoided
- Attention needs to be given to insisting on high standards of environmental considerations for new housing as well as extensions/ alterations
- Flood risk only increases with development; any mitigation required should be costed and developers should pay for upgrades to systems several miles from their site if that is where the impact will be felt
- Carbon emissions are high in the borough - ALL new houses should have significant green technology so they are carbon neutral; Eco retrofitting of all existing private housing stock - as has been successfully achieved in council housing in Skelmersdale; all new housing should be max 3 bedrooms to prevent oversized unsustainable properties
- More areas should be designated for tree planting as tree coverage in West Lancashire is below the national average
- Gardens need to be encouraged to be wildlife habitats; increasing fad for paved driveways and artificial grass is significantly reducing ability to move towards a sustainable future and needs to be addressed - possibly through council tax incentives for green spaces.
- Area is very poor for woodland and biodiversity. Tree and hedge planting would greatly improve the situation and help prevent flooding
- Further green spaces would help wildlife, collect carbon and be beneficial for physical and psychological health.
- Some areas have invested in their own wind turbines and if the benefits are direct to the local people, they can be very successful initiatives
- Better public transport links and cycling paths would help cut emissions
- Use of the canal could improve transport links e.g. Water taxis
- Landscape is characterised by largely flat, extensively drained mosslands and wetlands of the Coastal Plain in the west and north. Resultant, readily fertilised peat-soil plains provide highly productive farmland, so long as pumped drainage is sustained, so the Borough currently contains a very high proportion of the Grade 1 agricultural land in the North West; however, if drainage continues unabated, the oxidation rate of the carbon stored in the exposed peat suggests most of the peat-soils will be lost to the atmosphere by 2040
- Agricultural sector remains extremely important for national food security
- West Lancashire provides important habitats for a number of legally protected animal species
- There is a network of major wildlife corridors running through the Borough
- In the face of the continuing global and national biodiversity crises, increasingly important to protect, restore, expand and enhance the Borough's biodiversity and Habitats of Principal Importance
- Climate Change poses a threat to the social, economic and environmental well-being and measures will be needed to rapidly adapt to, and mitigate, climate and biodiversity emergencies at a local level

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Development of more sustainable systems for water level management is likely to become ever more pressing in the Borough
- As well as the need to reduce CO2 emissions massively and urgently we need to have climate adaptation measures in place especially for flooding
- Agriculture should be given greater prominence across the whole borough and stress the importance of preserving agricultural areas that are not so vulnerable.
- We want the Green belt boundaries to be preserved and to keep the West Quarry in the Green belt
- Preserving rural nature of the borough is important
- Better home insulation and better public transport would help reduce emissions
- Green energy should be explored in a more proactive way
- Need more green spaces given the huge increase in house building where fields, hedges, trees have been displaced and nothing put back in their place
- Maintaining green spaces is vital for biodiversity and wellbeing. One small initiative to tackle vehicle pollution is to encourage people to switch off engines whilst stationary - particularly when collecting children from school.

#### Statutory consultees and other organisations:

##### Environment Agency

- The landscape has been influenced by practices with environmental consequences, for example Alt Crossens perched watercourses caused by peat shrinkage and land level changes due to intensive agriculture and pumped land drainage. The plan will need to consider how development could contribute to or facilitate adaptation requirements from the effects of previous land and water management practices.
- Important to make clear that Biodiversity Net Gain (BNG) will be a mandatory requirement for most development
- Expect to see peat soils identified as a valuable resource to the Council in tackling climate change and reference Defra's Lowland Agricultural Peat Task Force should be made
- Carbon emissions are identified as being higher than other boroughs in Lancashire and the national average; would be useful to understand what sectors are driving this and whether carbon loss from peat degradation in agricultural areas is accounted for in the figures
- The document seems to prioritise flood risk in northern parishes, but it is a district wide issue set to get worse because of climate change. Only where it cannot be avoided should new development be permitted in areas at risk. Where development is permitted, mitigation and adaptation measures will be essential to ensure safety and prevent increasing risk off site
- Should provide more information about water bodies and issues that impact their quality
- Should highlight that flooding from tidal and fluvial sources are of particular importance in this area and given the expected impacts of climate change, avoiding development in flood risk areas should be the priority
- No reference to past flood events, such as those in summer and autumn 2020. Level 1 SFRA was updated in 2019, but given flooding has occurred since then, need to ensure evidence is as up to date as possible. Any new or emerging flood risk not identified in 2019 should be identified now

##### The Wildlife Trust for Lancashire

- Landscape of West Lancashire is characterised by largely flat, extensively drained mosslands and wetlands of the Coastal Plain in west / north. The resultant, readily fertilised peat-soil plains provide highly productive farmland, so long as pumped

### Scope, Issues & Options Feedback Report

drainage is sustained, so the Borough currently contains a very high proportion of the Grade 1 agricultural land in the North West; however, if drainage continues unabated, the oxidation rate of the carbon stored in the exposed peat suggests that most of the peat-soils will have been lost to the atmosphere by 2040.

- The agricultural sector remains extremely important for national food security
- West Lancashire provides important habitats for a number of legally protected animal species
- There is a network of major wildlife corridors running through the Borough
- In the face of continuing global and national biodiversity crises, it will be increasingly important to protect, restore, expand and enhance the Borough's biodiversity and Habitats of Principal Importance
- Climate Change will pose a threat to social, economic and environmental well-being and clear that measures will be needed to rapidly adapt to, and mitigate, the climate and biodiversity emergencies at a local level
- Development of more sustainable systems for water level management is likely to become an ever more pressing issue in the Borough into the future

#### Sport England

- Sport England welcome paragraph 8.32. However, it should be recognised that new developments offer the opportunity for creation of additional outdoor and indoor sport facilities as well as informal recreational spaces. The protection, replacement and enhancement of sport facilities should be supported by a robust evidence base.

### 2. What do you think is special about West Lancashire?

3 respondents answered this question.

#### Residents and members of the public:

- The Tawd Valley Park runs through the centre of Skelmersdale and the canvas is amazing as it changes with the season

#### Borough, Parish, Town Councillors / Community Groups:

- West Lancs has lovely thriving pretty villages, fantastic countryside full of nature, great things to do outdoors and in towns, great transport links by road and rail, a number of tourist attractions, several nature reserves, busy industrial centres, great schools, colleges and an award-winning university. We have lots of agricultural land which provides food and jobs. We are very lucky to have so much green space and I really value it;
- It needs to be cherished and not allow encroachment onto green belt for the benefit of developers; need to protect our countryside for future generations to enjoy. Housing is needed but not at the expense of green spaces.

#### Statutory consultees and other organisations:

CPRE – the Countryside Charity

- West Lancashire is one of the most important rural areas of Lancashire, providing jobs in agriculture and other rural sectors, but the Countryside has intrinsic value for residents and visitors for recreation and leisure
- It has high natural capital value due to the high grade of soils (including Best and Most Versatile Grade 1-3a) and wide-ranging biodiversity; and a unique landscape character arising from its geology and history

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- The area has a flat topography and large areas within the Northern Parishes (and to a lesser degree the Western Parishes) are at risk from potential flooding

#### 4. Issues Affecting West Lancashire

##### *Questions:*

1. **Have we identified the main planning-related issues in West Lancashire? Should any be changed? Should any be removed? Should any others be added?**

##### *By Thematic/Topic Area*

48 respondents made comments in relation to issues affecting West Lancashire by thematic/area.

##### Residents and members of the public:

- Traffic congestion and the capacity of the local road network needs to be fully taken into account when making planning decisions.
- Consideration should be given to incentivising development on brownfield sites and increasing developers' contribution to infrastructure development as a consequence of development on Green Belt.
- Serious consideration should be given to building a new secondary school in Skelmersdale.
- The policy needs to be more proactive for endangered species.
- All looks good. Please no more unsustainable large houses.
- A rail link for Skelmersdale needs to be a priority. Cycle lanes are a priority and financial cycling incentive initiatives to be encouraged. Eco retrofitting of existing housing stock.
- Yes, agree with these.
- More brownfield sites should be used for housing development. Planning conditions should be strictly adhered to.
- Yes, the main issues have identified, and none should be removed.
- There is a need to support and maintain a wide range of job opportunities. This needs to also state whilst protecting rural areas and limiting development wherever possible to existing industrial areas.
- More housing needed in Skelmersdale specifically.
- Agricultural land should be protected from building/development.
- There are a number of very large housing estates in Burscough and more needs to be done to ensure developers truly offer affordable housing.
- Speak to the traveller community to ask what they would like to be located and facilities they require. Need honest discussion with the local community and residents.
- To look at the impact of the massive growth of Edge Hill university especially in terms of the local housing market.
- Not enough school places available for the growing populations.
- Need to encourage transport to the university by other means instead of by car with perhaps out of town park and ride facilities explored.
- More emphasis on looking at providing better public transport.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Much of the social/health/economic/employment disparities are due to the lack of decent, accessible, affordable and frequent public transport.
- Accessibility to the Industrial Estates is very poor, by public transport or bicycle and walking.
- Rail transport should be high on the list. The council also needs to secure a commitment that the rail links to Southport and Manchester.
- There is no mention of the issues Burscough has regarding traffic congestion as a direct result of the town expansion. A traffic plan needs to be put in place.
- To investigate the damage to the other infrastructure below the roads gas pipelines under square lane that are constantly fracturing.
- Brownfield site is missing, can be utilised before any other type is considered.
- Before expanding industrial sites, look at the current sites to see how and why they are failing, consider other uses such as solar or wind farms.
- With developers having the upper hand thanks to government policy, the borough council must do everything in its power educate themselves to the loopholes these developers are able to exploit to stop developers grabbing land against the wishes of the residents.
- The council needs to get better legal advice to find ways to stop developers from finding loopholes to use our assets. Must do more to learn about culture and heritage, enlist the help of local communities and societies to come forward with sites deem to be of significance. List community assets and protect them. Need a register.
- Not enough is being done to look at the issues of flooding in and around Burscough and the northern parishes. The council needs to engage with and listen to the Flood Groups and must work more closely with the environment agency and united utilities to come up with and enforce, solutions.
- It is mentioned that one of the reasons for increased flooding is that people are taking up their gardens for parking - as people can't park outside their own properties because of the yellow lines or parking restrictions. Maybe this is something can work on with LCC Highways to look at the removal of unnecessary restrictions.
- A plan needs to be made to limit the number of charity and cheap shops in town centre. Those successful high street in town such as Kirkby Lonsdale and Settle with diversity of shops makes people want to visit. Encourage people to stay with free or cheap parking.
- No swimming pool in Burscough.
- Need to shout about places for people to visit (The Tawd, Fairy Glen) in West Lancashire. To consider the amazing asset of the Leeds Liverpool Canal. There is no investment in having the tow paths paved. It could be utilised so much more as a link between the villages. Paving the Tow Paths would be a great crowd puller to the various outlying villages. Should look at ways of encouraging or providing ways of using the canal for water sports.
- Worth looking at brownfield and contaminated land for solar or wind farms.
- This seems a comprehensive list but maybe plastics should be a separate issue.
- The issue of factory farming in sheds built on Grade 1 Agricultural land should be addressed and discouraged.
- Every future policy should be linked to promoting means of sustainable travel and improving infrastructure/connectivity to accommodate the inevitable rise in Personal Electronic Transport options.
- Retain all green belt areas throughout West Lancashire.
- Retain West Quarry Landfill in Appley Bridge as green belt and East Quarry remains full of water.

Borough, Parish, Town Councillors / Community Groups:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- All major issues are identified here.
- The comments on flooding and water management do not adequately reflect the significance of the issues in certain parts of the Borough.
- Do we need significant extra employment land if it will suck in more road traffic commuters from neighbouring boroughs? A better understanding of the direction of travel in regards to work patterns for the larger existing employers would be beneficial.
- The main planning-related issues in West Lancashire have been covered. Existing settlement boundaries should not be changed and the existing Greenbelt boundaries should be upheld.
- The general inadequacy of the existing surface and foul water drainage infrastructure to cope with any further residential developments. Improvements to the waste water treatment facility at New Lane have been promised by UU but never delivered.
- The amount of traffic on the lanes and unclassified roads around and through the villages especially HGVs on their way to the motorway system.
- The pressure on the existing health and community facilities within the villages caused by increasing population and the ageing.
- The provision of good quality jobs through the provision of high-quality employment premises in the right places.

#### Organisations, including developers, landowners and representatives:

##### Aylward Town Planning Ltd

- In the context of the section on "Heritage Assets", we welcome the recognition that there are numerous Buildings at Risk within the borough. This should go on to say that policies will be formulated to encourage that these can be brought back into viable use.

##### Tawd Valley Developments

- The availability of quality homes fit for modern living will be vital to the future success of the borough and the health and well-being of current and future residents.
- The need for a well-connected society should be incorporated into planning policy supporting the desire for housing land availability, housing accessibility and efficiency.
- West Lancs should be a standard-bearer for quality housing. Promote good design and innovations.

##### NJL Consulting on behalf of owner/developer

- They have not been translated to the various issues facing each particular settlement - e.g. affordable housing is needed in Burscough.

##### Gladman

- Gladman agree with the Council's considerations.
- There is a need for affordable housing in both the urban and rural areas.
- Some land which does not fulfil the five purposes of the Green Belt will need to be released to ensure development needs.
- Gladman would suggest further clarity is required on Improving Water Efficiency as the Council will need to demonstrate that West Lancashire is a water stressed authority in order to benefit from the tighter building regulations relating to water efficiency measures.

##### Smith and Love on behalf of I & J Hill Partnership

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- The 'Local economy and employment' issues could appear contradictory whereby it is said (for employment opportunities) that the Borough 'has steady ongoing growth in jobs' and a 'wide-ranging employment base including a strong manufacturing sector' yet the evidence base does not support this and points to the risk of decline. This is reflected in the text which highlights that the Borough is more vulnerable to the (potential) negative effects of Brexit than the national average and the text concerning employment land availability and take up.
- Strongly agree with the text which recognises that the slow and limited take up is a direct reflection and consequence of the lack of a suitable quantity and quality of employment land supply which has a suppressive and recessive effect. This section should also highlight that the lack of suitable supply is most evident and acute at Skelmersdale and the significance this has as the Borough's largest employment centre and focus for major regeneration and employment growth and investment in the plan period.
- The limit on the options available for transformational employment growth at Skelmersdale is a major issue the Plan must confront and appropriately address, and which strongly confirms the need for a Green Belt Review.

#### Savills on behalf of Harworth Plc.

- The consultation document is correct in identifying the inequalities across the Borough and the Local Plan needs to plan to deliver new employment opportunities towards the south of the Borough, with strong connectivity to new or existing residential areas. The masterplan submitted with this response sets out strong links to the existing settlement of Skelmersdale to deliver a self-sustaining development.
- The Borough needs an aspirational plan to deliver a significant quantum of employment floorspace that meets the needs of the market for warehousing of a major scale, in the most sustainable manner possible.
- The geographical issues affecting the Borough's Eastern and Southern Parishes include the identified inadequacy of the local road network to sufficiently cope with increased HGV movements.
- The Local Plan covering the period up to 2040 represents a major opportunity to address the inequalities and lack of sustainable communities within the Borough, strategic allocation of sites adjacent to the M58 therefore represent a key opportunity.

#### Smith & Love Planning Consultants on behalf of Mr D. Little

- The limit on the options available for accommodating new housing growth in the Borough is a major issue the Plan must confront and appropriately address, and which strongly confirms the need for a Green Belt Review.

#### Asteer Planning LLP on behalf of Richborough Estates Ltd

- Housing – to provide a mix of housing types and tenures in appropriate locations; an identified requirement to address affordability issues and deliver significant new affordable housing on deliverable (and viable) sites; the need for new purpose built student accommodation to address the proliferation of HMO in Ormskirk.
- Economy and Employment – the need for a quantity and quality of employment land to meet the diverse needs of West Lancashire, a lack of the type and quality of sites / opportunities that deliver knowledge led uses that will drive upskilling, diversify the employment base and support the retention of the Borough's new graduates; the need for flexible and innovative workspaces that can respond to a post-pandemic / post-Brexit market; and supporting the growth of Edge Hill University.
- Transport – a lack of accessibility in the Borough and the need to increase access to public transport and reduce reliance on private vehicles.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Land Resources –there is a declining supply of previously developed sites in the Borough, which often have significant challenges to viability and deliverability. It also recognises the constraint that Green Belt presents to growth.

#### Smith & Love Planning Consultants

- Broadly support these topic areas, including that there will be ongoing issues of rural isolation poverty. This issue can be counteracted with appropriate planned housing growth to provide social and economic support to those communities at risk.
- Changes in working patterns due to the Covid-19 pandemic is likely to be a positive influence for the rural communities and will result in less reliance on transport and will bring a greater flexibility and demand for living in rural areas and communities, which must be planned for appropriately.
- The 'Land resources' issues should revert to the Green Belt text. The Plan must confront and appropriately address the issue and major constraint to accommodating housing growth on the edges of all the Borough's settlements, and which strongly confirms the need for a Green Belt Review.
- The new Local Plan must make appropriate housing allocations in the most sustainable location, or must extend settlement boundaries, or if Green Belt boundaries are not altered, by permissive development management policies for rural housing exception sites.

#### Pegasus Group on behalf of Rowland Homes

- Demographic data need updating in due course.
- For Skelmersdale, the following issues are highlighted:
- Negative Image of Skelmersdale - Rowland are looking to address this issue directly by investing in the town through the development of a high quality residential development at Vale Lane, encourage people to want to live in Skelmersdale.
- Former Coal Workings – Site still contain remnants of these workings will not physically preclude development of this site based on initial feasibility work.
- Rowland are looking to combat deprivation in Skelmersdale by investing in the Vale Lane site, with a high quality residential development which will have a number of direct and indirect economic benefits.
- Other neighbouring towns within West Lancashire (and beyond) have stations which are accessible to Skelmersdale and this site via local bus services. This is not considered to be a constraint to bringing forward development in and around Skelmersdale.
- Therefore, the Local Plan Review process is well placed to address the local issues in Skelmersdale, around deprivation, the negative image of the town, coal mining constraints and public transport.

#### Pegasus Group on behalf of Story Homes

- For Burscough the following issues are highlighted:
- Need for new development to integrate with existing settlement – Noting that there is already an SPD for the Yew Tree Farm allocation, which includes the Story land; with all the developers and landowners within the area in regular dialogue to ensure this is achieved. There is also an opportunity to amend the plans for Yew Tree Farm or any further planned growth in Burscough through the emerging Local Plan process.
- Drainage capacity – Fully acknowledge that there have been issues with flooding and sewer capacity in recent years, 'United Utilities are working to address the capacity issue at New Lane WWTW. Either way, the Local Plan process offers the ideal opportunity to address these issues at a strategic level, through future allocations, via on site improvements or off-site contributions (potentially through an updated CIL charging schedule).



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Highway capacity – The plan notes that the road system through Burscough (particularly the A59) can become congested at times, and no direct access to the motorway system. The Local Plan process offers the perfect opportunity to address highways issues.
- The Local Plan Review process is well placed to address the local issues in Burscough raised in this section, around integrated development, drainage and highways.

#### Statutory consultees and other organisations:

##### Trans Pennine Trail National Office

- Active and sustainable travel - It is vital that the Trans Pennine Trail is noted and fully represented within this section.
- Climate Change - The TPT should be recognised in terms of the benefits it brings in terms of reductions in carbon emission.

##### The Wildlife Trust for Lancashire, Manchester & North Merseyside

- Housing - to improve housing and other built development through national 'Building with Nature' standards.
- Cultural heritage and landscape - suggest amending the text to read: Green Tourism – heritage, wildlife and landscape are important parts of the Borough's character and tourist economy. They present opportunities to improve health and wellbeing through 'outdoor access'.
- Climate emergency, energy and flooding: suggest amendments to read as follows:
- Peatland – parts of West Lancashire are drained peatland, where development should be avoided if possible. If not avoidable, the impacts of carbon loss through development need to be mitigated or offset and measures should be taken to end ongoing peat oxidation - and associated carbon emissions - by actively restoring West Lancashire's peatland's functionality as a major carbon store and active sequesteror.
- Flooding – SuDS could be incorporated as part of green infrastructure, surfacing front gardens with impermeable material, to improve flood storage upstream, including through nature-based solutions.
- There is an Air Quality Management Area in central Ormskirk, but appropriate measures will be required elsewhere.
- There is a need to integrate habitat and species restoration and enhancement and ongoing maintenance into development proposals to improve biodiversity, not just to compensate for losses. The forthcoming BNG requirement will need to be reflected in the Local Plan and planning decisions.
- West Lancashire supports populations of statutorily protected species and areas of priority habitats; it is important that these continue to be protected, recovered, sustained and enhanced as required by statute and regulation.
- Connecting habitats, protecting and enhancing wildlife corridors is an important priority – particularly in more urban or agriculturally intensive areas of the Borough – to help facilitate species transfer.
- The Borough contains significant local areas of public open space and recreational facilities. Need to maximise appropriate access to, and linkages between and expansion of these assets. Green and Blue Infrastructure improvements should address physical infrastructure and nature's recovery.
- Peatland should be protected and restored. It will also be important that new forestry does not degrade or destroy nature recovery networks that are key for open semi-natural habitats and the species that depend on those: in West Lancashire Borough, overwintering migratory wildfowl populations are internationally significant in that

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

regard, and Water Vole and Purple Ramping-fumitory believed to be nationally significant.

- The Borough has a number of water assets that contribute to the local landscape, economy, and biodiversity.
- Increasing draw-offs by the market-gardening industry in response to local climate change may also impact adversely on the biodiversity and quality of remaining wetland habitats in the Northern Parishes. Continuing and possibly accelerating loss of West Lancashire's peat-soil to oxidation and to dry surface wind-drift due to increasingly lower water tables may well also impact adversely on current biodiversity assets and ecosystem services.
- Many rural areas in the Borough have inadequate access to public transport and public rights of way and open access land are comparatively scarce.
- Access to open space is reasonably adequate although some parts of the Borough lack formal parks or children's play facilities.
- Many parts of the Borough suffer from limited green and grey infrastructure capacity. Solutions need to be provided if future development needs are to be accommodated sustainably.

#### Environmental Agency

- Water quality is not mentioned in relation to the "Water Quality and Resources" section, however some water bodies in West Lancashire suffer from frequent, intermittent pollution or diffuse, rural pollution. The local plan can help to resolve issues through identifying them and supporting improvements like the ones in the Tawd Valley Park Masterplan (wetlands providing water quality improvements at end of pipe); and / or to be able to control changes of use particularly in the industrial estates to have better drainage solutions which avoid cross contamination of the surface water sewer network.
- Water resources are not considered more broadly and water supply only appears to refer to the United Utilities public supply. More sustainable practices such as trickle irrigation and above ground storage lagoons instead of abstractions are likely to be required over the plan period and beyond.
- Environmental Agency will support the local authority's policies on the re-use of brown-field and contaminated land and will apply a risk based approach to ensuring appropriate and sustainable remediation actions are secured to improve water quality.
- All sources of flooding impact the borough and policies should influence proposals not only by avoiding inappropriate development in areas of high flood risk, but also promoting mitigation and adaptation measures where other flood risks exist.
- The recently published England Peat Action Plan will need to consider.
- Better ecological functionality and connectivity via enhanced wildlife corridors and networks within rural areas should be supported / promoted.

#### Natural England

- Natural England welcome the noting of peat deposits for the Western Parishes, and advise that peat deposits should be noted for the Northern and Southern Parishes. However, have concerns about the strength of the thematic policies in regarding development on peat and its management and feel that the implications in respect of both carbon emissions from development and inappropriate management are currently under-represented.
- Following the publication of the England Peat Action Plan and the results of a number of peat pilot projects, Natural England have a better understanding of the impact of carbon loss from damaged and unmanaged peat, as well as the opportunity

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

costs of not restoring peat as a functioning ecosystem. Natural England would welcome further discussions with West Lancashire Borough Council in this regard.

#### Canal & River Trust

- The Trust welcomes reference to the need to create more connected, walkable communities and consider that the Leeds & Liverpool Canal can play an important role. It is important that towpaths are fit for purpose to accommodate increased usage. New development and infrastructure improvements should be provided for alongside suitable signage and wayfinding. Contributions should be sought for development sites adjacent to the canal to maximise and maintain these routes.
- The Trust consider an updated and full review of heritage assets and local list should be provided as part of the Local Plan. The Trust would welcome the opportunity to assist the Council in reviewing this list.
- The canal network helps support green tourism, in attracting boaters. The Trust would welcome attempts to enhance infrastructure around the canal at key locations, including the improvement of access and wayfinding between popular mooring sites and local population centres.
- Waterways have a role to play in building energy and environmental resilience and supporting the transition to a low carbon economy. The canal can also accept surface water drainage from development sites, subject to a separate commercial agreement.
- It is considered that new development adjacent to the canal should be required to protect and enhance boundary hedgerows and trees, to protect wildlife when proposing any new lighting adjacent to the canal boundary, with bird boxes and bat bricks incorporated as part of new housing.
- The Council may wish to consider whether specific reference to 'blue infrastructure' should be included within the plan, noting the specific opportunities for sustainable drainage, urban cooling and connecting wildlife corridors.

#### CPRE, The Countryside Charity Lancashire, Liverpool City Region and Greater Manchester

- Safeguarded Land Policy - In the current adopted plan Policy GN2a sets out Safeguarded 'Plan B' Sites and also Policy RS6 concerning 'Plan B' for Housing Delivery in the Local Plan. Consider that there are material considerations that require the sites that remain undeveloped to be assessed for protection by Green Belt redesignation.
- Refer to a case with Land off Parrs Lane, Aughton L39 and draw attention to the Appeal decision. The public benefit in redesignation to Green Belt outweighs the likely costs of retaining the land as a safeguarded site for housing. The site as well as not being appropriate for development is not needed. There are other allocated sites to be considered for deletion from the local plan.
- A key issue is that Safeguarded land is of very high grade (Best and Most Versatile Grade 1) agricultural quality and it should be considered as a national asset and protected as a land asset of value for future generations, so they are able to grow food and for food security reasons.

#### Historic England

- The importance of managing the pressures of development with the conservation of the historic environment is an important issue for the Plan to address.
- The subcategory of heritage assets should be broadened in its content, to ensure that all asset types are covered as only conservation areas and listed buildings are mentioned.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Development pressures to a heritage asset can be affected by development affecting their setting not just within (a conservation area) or to a listed building. This needs to also be amended.
- In addition, the importance of local character and distinctiveness is not just about historic landscapes, it is an important element of place making and good design. In view of the government's recent agenda on good design, this should be amended. It is recommended that a separate subcategory be introduced which covers design.

#### *By Geographical Area*

34 respondents made comments in relation to issues affecting West Lancashire by geographical area.

#### Residents and members of the public:

- Addition of the impact of congestion within Banks at the junction of Station Road and the A565 and the lack of a safe cycle path along the A565 past Banks
- Please stop lumping in UpHolland with Skelmersdale. Not one of the comments in the combined Skelmersdale /UpHolland section actually refer to UpHolland.
- There are significant problems around Aughton, particularly around junctions and at peak times. This is exacerbated by the high volume of traffic from outside of the Borough that uses the Borough's local roads as part of a commute. Speed limits in and around Ormskirk are consistently ignored.
- Road infrastructure is inadequate for increasing HGV movements in Western Parishes.
- The following should be added: Much of West Lancashire has a unique rural character which should be recognised, cherished, and preserved. West Lancs forms the first rural fire-break outside of the urban northern belt that is Manchester and Liverpool. This greenbelt, this fire-break, must be preserved and nurtured. It will become an ever increasing asset to West Lancs as seen by urban dwellers who want to get away from urbia.
- Surface water drainage is a significant problem in Aughton and along St Helens Road.
- Eastern & southern parishes - flooding has been experienced in other areas, often due to excessive run off from fields. HGV traffic along unsuitable roads also affects residents well-being and can damage properties due to vibration and noise.
- When considering residential planning applications, should take account of the local housing needs.
- Plans to fill the quarry in Appley Bridge would cause considerable impact on the local community. Other options that could be considered like wildlife area or recreation.
- Skelmersdale has an awful reputation for anti-social behaviour and drug use which nothing is ever being done about it especially in the town centre.
- The rapid expansion of the village through the Yew Tree Farm development that most people in the village objected to, has had a massive negative impact on the village.
- Please actively promote the benefits of Skelmersdale.
- There is no regeneration in Skelmersdale Town Centre.
- Continual residential development in areas around the Burscough Village (School Lane/Red Cat Lane/Warpers Moss) would result in a severe cumulative impact (contrary to the NPPF) on the highway network.
- Please retain all green belt areas throughout West Lancashire. Please by-pass A5209 through Newburgh / Parbold. Please retain the water filled quarry at Appley Bridge as a feature maybe with houses all round the rim of the quarry.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- In village of Appley Bridge (South East Parish) there is too much large vehicle traffic (HGV) and heavy industry. Need to reduce the amount of road traffic and commercial land.

#### Borough, Parish, Town Councillors / Community Groups:

- There is no further comment at all about Up Holland Village. The Council is 'lumping' the village in with the 'negative image' which Up Holland Parish Council strongly objects to.
- The need for the council to ensure the information that all the residents need to know about is available for proper consultation.
- The safeguarded land in Burscough should not be considered for further development until all the other issues are resolved which should include a bypass.
- Reports are suggesting the lower parts of Burscough will be flooded by 2050, this is where the sewage works are.
- Lack of sufficient services and recreational activities for the public in Burscough.
- The area needs a bypass urgently to remove HGV from A59 and Burscough and surrounding villages of unsuitable and volume of HGVs.
- Noise and air quality is a problem for a number of roads in Burscough and other villages.
- There needs to be an equality of facilities and recreational activities across the borough, Burscough is often left out and treated unfairly.

#### Organisations, including developers, landowners and representatives:

##### Aylward Planning

Fails to mention Up Holland at all. There is a need to consider intervention to secure the vitality of the centre and other local services.

##### Satplan on behalf of Gleeson Homes

- Gleeson Homes agree with the general thematic issues and consider the release of sites that adjoin existing urban areas would have a have a lesser impact on the Green Belt and its associated purposes.
- Future housing growth and a mix of affordable and market housing in Skelmersdale would help to assist with identified issue.

##### Satplan on behalf of Stewart Milne Homes

- Stewart Milne Homes agree with the general thematic issues and consider the release of sites that adjoin existing urban areas would have a have a lesser impact on the Green Belt and its associated purposes.
- Have also considered the issues relating to Ormskirk with Aughton and agree particularly with the need for the Town Centre to evolve and maintain its Vitality & Viability. Future housing growth in this area would assist with this identified issue.

##### Smith & Love on behalf of I & J Hill Partnership

- Skelmersdale being overlooked as a location for new business investment. It should also be highlighted that the lower educational attainment and long term unemployment.
- Limited remaining opportunity provided by the employment land supply policies and proposals of the adopted Plan to grow and diversify the economic base and employment offer.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- There is an absence of high quality accommodation and development opportunities for identified growth sectors including advanced manufacturing, research and development and professional services in science, health and food technology.
- There is also an under-developed business support and ancillary services sector in Skelmersdale relative to the scale of its economic base and number of employers.

Smith & Love on behalf of Mr D. Little

- The part of the Western Parishes which is located adjacent to the Sefton periphery, is a sustainable location for new housing growth which is confirmed by the Sustainable Settlement Study 2021. Segars Lane is identified as the closest area to the centre of Ainsdale, the location is 'reasonably sustainable' with an understatement based on the evidence.
- 'Land close to the boundary with Southport is subject to flood risk' is not accurate. It should be distinguished that there is land adjacent to the Sefton boundary which lies in Flood Zone 1 and including, for example, SHELAA site HA.053.
- Strongly disagree that the principal villages in the Western Parishes including Haskayne, Halsall and Bescar, are so inaccessible to services that their communities suffer.
- Do not agree that rural isolation poverty is an existing issue but agree that it is a threat.
- Need further housing and population growth in these rural areas to attract and retain a younger demographic and to combat the effects of an ageing population and the current threat of rural isolation.
- The Western Parishes are in a unique geographical location in that they provide close inter-connectivity between the network of rural communities.

Pegasus Group on behalf of Bloor Homes

- Bloor Homes agree that all of these issues will require consideration through the preparation of the Local Plan.
- For Burscough the following issues are highlighted:
  - Support there is a need for new development to integrate with existing settlements. In the context of the land being promoted by Bloor Homes, site can be coherently master planned and brought forward as one or in agreed phases with the Local Planning Authority.
  - The Local Plan process offers the ideal opportunity to address flooding and sewer capacity issues at a strategic level and identify any mitigation or upgrades addressed through future allocations, via on site improvements or off-site contributions.
  - The Local Plan process offers the perfect opportunity to address highways issues. All highways and other transport related improvements, works and mitigation measures can be funded through the new developments
- The Local Plan Review process is well placed to address the local issues in Burscough raised in this section, around integrated development, drainage and highways.

## 5. Vision

### **Questions:**

1. **Do you have any comments on the proposed Vision for West Lancashire in 2040? Please set out below anything you think should be changed. (Please bear in mind that the Vision should be achievable through Local Plan policies.)**

### Scope, Issues & Options Feedback Report

40 respondents made comments in relation to Vision.

#### Residents and members of the public:

- There needs to be a review of the Green Belt boundaries where suitable as they are too restrictive currently
- Burscough has been over developed over recent years, and it is cannot cope with further development. The roads and sewers are already at capacity and it is losing its identity. It will cease to be the pleasant and desirable place that it currently is if development continues.
- Growth in the three main settlement areas should compliment the existing settlements and be controlled having due regard to existing green belt areas and supporting infrastructure.
- I like the suggestion about each town, village and hamlet retaining its own character. I question the comment about the regeneration of Skem. When will this every achieve the right results? Skem is constantly being regenerated.
- I would like to see a greater emphasis on the importance of the area to the UKs food security - this area is such a key player. Its a great pity that this is below the desire to attract new businesses and a picture of a large warehouse. If we are to attract new businesses to the area over and above contributing to the UKs food security do we really want it to be to large sheds?
- Comments about the importance to the UK food security run hand in hand, and not counter to, the desire for good biodiversity. This area is well suited to providing both if policies are well thought out.
- Historical infrastructure, such as canals within the borough, and rural rail network, should feature more prominently in the vision. The history and useable features of this infrastructure must be nurtured and improved if possible. This will aid many other parts of the local plan, including the vision for encouraging visitors to our beautiful borough.
- West Lancashire should be a Climate Beacon - with extensive tree planting programme, with good quality carbon neutral new build housing. Being a University town - Ormskirk should have higher than the average cycling levels.
- Flood plains should be preserved and building should in most cases be on brown field sites
- This is nothing more than a wish list compiled by WLBC; very unlikely to be feasible; it presents a 'preferred future' where everything turns out well. There are two extremes to planning for the future: one is 'high expectations' the other is 'reality'. The vision is decidedly short of 'reality' and the Council needs to start again and inject a dose of reality; clear case of 'Council knows best' and this way of collecting responses robs the population of freedom of expression as the questionnaire is largely structured to confirm the Councils wishes
- Skelmersdale needs a complete refresh with more being put into things for residents to do and local services. Attract big retailers to the new town centre not just discount stores. More local public transport that is reasonably priced and more regular. Fix the roads as they are a state. More needs to be done about safety in the subways, adequate lighting, CCTV, general maintenance; Ashurst is a forgotten area with overgrown paths making it near impossible to walk on what little pavement there. More facilities for kids like community centres, bowling, cinemas
- Agricultural land and green belt should be protected
- More cycle routes should be provided
- Affordable , suitable accommodation for an ageing population should be provided
- How will good quality, affordable housing be measured?

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- How will you ensure energy-efficient housing that preserves the area's character; what is meant by energy efficient - solar panels?
- What rules will be placed on developers to ensure housing is within keeping to an area?
- What will be classed as a flood risk? How will this be managed and by who?
- How will residents feel empowered to support change through the planning process? Currently residents are ignored when they object and are often over ruled, outsmarted and outwitted by housing developers - what will be put in place to stop this happening? How will the planners listen to residents?
- What new businesses are you looking to attract and how?
- How will we retain skills in the Borough?
- Infrastructure in West Lancashire will have been improved - what infrastructure and how?
- What are the green transport options? What about public transport? Will the train station finally have been built in Skelmersdale? What about the electrification of the Ormskirk to Preston line?
- Improved health, community and leisure facilities - what will they be?
- Enhancement of the Leeds-Liverpool Canal - what will these enhancements be? Paving of the Towpaths?
- It is imperative that LCC agree to repair and upgrade the Derby Street bridge and keep it as a 2 lane road or we will jam up Ormskirk. Alternatively build the by-pass
- Perfect vision

#### Borough, Parish, Town Councillors / Community Groups:

- It is appreciated that Up Holland is "with Skelmersdale" but the distinct identity of historic Up Holland, the community hub and village atmosphere has grown in attractiveness and should be maintained
- The use of an image of a large B8 warehouse in the vision section on economic growth is NOT the sort of growth we should be aspiring to. Our economic growth should focus on less land hungry sectors and seek to retain start-up businesses from e.g. Edge Hill
- The statistical calculation used for projected population growth should be carefully examined in light of the demographic report/population forecast commissioned by parishes using the CPRE's Demographic consultant in 2018; this provides the most up-to-date statistics on expected population growth, the numbers given by WLBC are greater than those supplied by the demographic consultant
- To produce a vibrant, healthy, caring, safer, accessible and prosperous place where new development and its residents and occupiers are fully integrated into the fabric of the Borough and its community
- Any growth to be managed through the improvements to infrastructure, services and utilities.

#### Organisations, including developers, landowners and representatives:

- The vision is good and with refinements to the policies could be achieved. To add to the vision: All residents live in safe, inclusive and welcoming neighbourhoods, where people choose and aspire to live, raise their families and grow old. Public services are aligned with local need to reduce inequalities, where they exist, within the borough

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Satplan on behalf of Gleeson Homes:



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Note that specific reference is made to providing a good quality, affordable and energy-efficient housing, however, there is no specific reference to elderly or specialist elderly accommodation – these types of accommodation are also critical to the right housing mix and choice

Satplan on behalf of Stewart Milne Homes:

- Specific reference is made to providing a good quality, affordable and energy-efficient housing, however, there is no specific reference to elderly or specialist elderly accommodation – these types of accommodation are also critical to providing the right housing mix and choice, future iterations of this document should include such reference.

Gladman:

- In principle, Gladman support proposed vision and recognition to provide a wide range of good quality, affordable and energy efficient housing. However, this could go further to ensure that the minimum housing needs will be met in full over the plan period.
- Gladman welcome that the borough's three main settlements of Skelmersdale with Up Holland, Ormskirk with Aughton and Burscough will continue to be the focus for development.

Comments from Edge Hill University (EHU):

- Continued growth, diversification and expansion of EHU will be an important conduit in realising the vision in providing state of the art facilities, sustaining economic activity and job creation and producing skilled graduates across health, education and STEM sectors. A dynamic local economy will provide greater opportunity for young people to remain in West Lancashire to support economic growth; EHU ought to be explicitly highlighted within the vision with this wording: "West Lancashire's fantastic potential will have been harnessed through supporting the continued growth and development of Edge Hill University as well as other institutions such as West Lancashire College. This will ensure continued investment in our young people to ensure their potential maximised. The Council will work with both institutions to ensure that a greater number of post graduate jobs are created to retain skills and talents in the borough."

Savills on behalf of Harworth Group

- Broadly support vision, with the exception to the proposal for the three main settlements of Skelmersdale with Up Holland, Ormskirk with Aughton, and Burscough to continue to be the focus for new development; this restrictive vision will hinder growth of the economy, and will neglect a significant opportunity to deliver strategic sustainable development adjacent to Junction 3 of the M58, capable of development in line with the remainder of the vision.
- Development proposed at Rotherham's Green will, as proposed in the ceased Local Plan Review, deliver a quantum of development capable of supporting new infrastructure and services to meet needs of new households, in a location close to Skelmersdale with access to services. The scale will enable development to be self-sustaining. Aecom, have developed the illustrative masterplans for the proposal, and consider a settlement of under 1,300 homes to be less sustainable in terms of the number of new services that can viably be delivered.
- Harworth are committed to delivering high-quality and environmentally sustainable warehousing space, and have already delivered a scheme of 4 million square feet of industrial and warehousing floorspace at Junction 4 of the M61. It is the intention to continue to deliver new warehousing space with Net Zero carbon emissions at operation.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

Lichfields on behalf of Taylor Wimpey

- A key focus of the Vision for West Lancashire is the climate change crisis. Ensuring the Borough provides a wide range of good quality, affordable and energy-efficient housing that preserves the area's character and has a positive effect on health, wellbeing and general quality of life. The vision also places emphasis on the sustainable growth of the Borough's economy, creating high quality jobs, attracting new businesses and retaining and enhancing existing businesses.
- With rural areas, villages and hamlets, the vision sets out that they will retain their rural character whilst acting as focal points for local services and appropriate employment, and for good quality affordable homes. The agricultural and horticultural industry will remain a focus in rural areas, having embraced new technology and nature-friendly practices.
- Taylor Wimpey agrees that the climate change crisis is an important issue and broadly supports its inclusion within the Vision; The focus on the provision of a wide range of good quality, affordable and energy efficient homes is appropriate to be included within the Vision; welcome the recognition of rural areas and that they provide an opportunity to offer local services, employment and good quality affordable housing and considers this an important focus of the development plan.
- In order for sustainable economic growth, it is vital that development opportunities are provided across the borough, including the Eastern Parishes which did not get any housing allocations in the last Local Plan; Taylor Wimpey feels the extension of Appley Bridge provides a sustainable growth opportunity

Smith and Love consultants

- Reference should also be made to the edge of Southport, where housing growth can also be planned in a highly sustainable location and outside the Zone 2 and Zone 3 flood risk areas

WSP on behalf of Seddon Homes

- Seddon believes settlements like Tarleton should also be the focus for sustainable market housing in addition to affordable housing. Tarleton is the largest settlement within the Northern Parishes and benefits from excellent services

Pegasus Group on behalf of Bloor Homes:

- Bloor Homes will look to assist the Council to deliver this vision through provision of high quality development of new family homes, affordable housing and new areas of commercial development and recreational open space on a highly sustainable site in Burscough; envisaged that three main settlements will continue to be the focus for new development, we fully support this approach, particularly the recognition of Burscough as a key settlement and focus for growth.

Lichfields on behalf of Crompton Property Developments Ltd. (CPDL):

- A key focus is the climate change crisis and placing emphasis on the sustainable growth of the Borough's economy, creating high quality jobs, attracting new businesses and retaining and enhancing existing businesses. CPDL is in agreement that all of these issues are important and should be included within the Vision
- The vision states that Burscough (along with Skelmersdale with Up Holland and Ormskirk) will continue to be the focus for new development. CPDL agrees that Burscough should continue to be the focus and Yew Tree Farm provides a unique opportunity to realise the vision; that there is sufficient land to meet both employment and housing land needs for the plan period

Pegasus on behalf of Rowland Homes

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- The Local Plan seeks to make West Lancashire an attractive place that people want to live in, work in, and visit. Rowland fully support this aim and will assist in delivering this through provision of high quality family housing; particularly welcome the primacy given to provision of a wide range of good quality, affordable and energy efficient housing, and agree that this will preserve the area's character and have positive effects on health, wellbeing, and quality of life
- Fully support the three main settlements: Skelmersdale, Ormskirk with Aughton and Burscough continuing to be the focus for new development, particularly the recognition of Skelmersdale's role as a key settlement and focus for continued growth.

#### Pegasus on behalf of Story Homes

- Fully support overall aim and will assist the Council to deliver this through the provision of high quality family housing at Yew Tree Farm; particularly welcome the primacy given to a wide range of good quality, affordable and energy efficient housing; Story has a long standing reputation of providing homes with outstanding build quality and to a high specification.
- Fully support the three main settlements continuing to be the focus for new development, particularly the recognition of Burscough's role as a key settlement and focus for continued growth.

#### Statutory consultees and other organisations:

#### National Highways (NH)

- The vision indicates that existing patterns of development, focussed around Skelmersdale with Up Holland, Ormskirk with Aughton and Burscough will continue into the future. Transport evidence will need to consider the impacts at M58 junctions 3, 4 and 5.
- Vision refers to key infrastructure including active travel and public transport, but does not explicitly refer to a functioning Strategic Road Network (SRN). Agree encouraging sustainable travel is important to reduce traffic impacts on the SRN but also need to focus on the SRN and its function – in particular providing access to the three main settlements through the M58.

#### Environment Agency

- Recommend reviewing / rewording several sections:- No reflection given to challenges associated with climate change that will require consideration as part of decision making. Climate change will impact all aspects of the vision and this requires a stronger emphasis
- Flood risk - vision should be reworded to place stronger emphasis on developments' responsibility to manage existing flood risk and address impact of climate change on flood risk in future, i.e. delete 'Where there is flood risk, any new developments will have managed that risk appropriately' and replace with 'Where flood risks exist now or in the future, inappropriate development will have been avoided and all necessary mitigation and adaption measures will have been incorporated where appropriate development is permitted.'
- Drainage and peat - recommend revising this such that the agricultural and horticultural industry will remain a focus in rural areas, having embraced new technology and nature-friendly practices 'that support positive adaptations to address significant sustainability issues in the rural areas'
- Recommend vision includes stronger reference to good quality water bodies and sustainable use of water resources.

#### United Utilities

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- United Utilities is supportive of the emphasis on Climate Change. This should be a golden thread that runs throughout the policies in the emerging local plan.

#### Natural England

- Advise that the Vision and development strategy should address impacts on and opportunities for the natural environment, and should set out the environmental ambition for the plan area.
- Should take a strategic approach to protection, restoration and enhancement of the natural environment, including providing a net gain for biodiversity, and consideration of opportunities to enhance and improve connectivity, along with improved access to nature and greenspace.
- Nature based solutions (NbS) to climate change mitigation and adaptation should be considered within the strategy.
- Where relevant should be linkages with Local Nature Partnership, Rights of Way Improvement Plans (including the England Coast Path), Green Infrastructure Strategies, and the Nature Recovery Network (NRN) as it emerges through the Local Nature Recovery Strategy (LNRS).

#### Historic England

- Reconciling the assessed development needs of the Borough with protection of the distinctive character of settlements and significance of heritage assets is one of key challenges; imperative that reference made to it within the overall vision and objectives.
- Welcome reference to 'historic' but the vision incorrectly references buildings and character, resulting in a vision which does not include the whole of the historic environment. The list of natural and historic asset types, should all refer to being conserved and enhanced rather than just valued and enjoyed.

#### Sport England

- Want to see direct reference to Active Design and maximising opportunities for physical activity. High quality design should automatically include principles of Active Design so tht physical activity opportunities are maximised as well as social and environmental benefits. The Active Design Guidance can be found on Sport England's website: <https://www.sportengland.org/facilities-planning/active-design/>
- Reference to 'green' transport options, green spaces and green travel is welcomed but should explicitly state that such green infrastructure will be properly connected to promote walking, cycling and other physical activity.

#### Trans-Pennine Trail

- Importance of Trans Pennine Trail should be recognised as a major sustainable transport route across the north through 27 Local Authorities, providing key connections to Sefton and Liverpool.

## 6. Objectives and Indicators

### **Questions:**

1. **What are your views on the proposed Objectives? Should any be adjusted? Should any be removed? Should any others be added?**

33 respondents answered this question in relation to Objectives.

Residents and members of the public:

### Scope, Issues & Options Feedback Report

- Addition of the protection of existing housing from adverse consequences of new developments
- Concerned with growth of linear parks at expense of natural environment / Grade 1 agricultural land. There is a considerable existing path networks that if publicised could be utilised to provide access to the countryside. Linear Parks should be properly defined e.g. canal footpaths and disused rail lines e.g. Rainford Linear Park, not created on Grade 1 farmland.
- There should be an objective of contributing to the UKs food security given the amount of high quality of agricultural land in the area. This works well with objectives 1 [Addressing climate change] and 10 [A flourishing natural environment].
- With regard to objectives 1 [Addressing climate change], 2 [Sustainable communities], and 3 [A healthy population]: For years local and national authorities have failed to see the environmental emergency we are now in, for example lack of imagination and action shown by all authorities toward waste recycling; WLBC and all authorities should have been giving us this recycling waste stream 10 or 15 years ago and this needs to be easily accessible for rural areas and in partnership with the private sector.
- Very pleased to see Climate at the top of these objectives; and would like a flourishing Natural Environment extended to include gardens to increase biodiversity in these areas and reduce unsustainable paving /plastic covering of gardens. More Recycling needs to be added to the objectives.
- Ensuring rural areas in greenbelt are not overwhelmed by large scale projects for housing / warehousing. Keeping industrial and warehouse development close to and alongside existing industrial and warehouse sites. Allowing only small housing developments preferably on brownfield sites which do not impact hugely on rural areas
- Objective 1: Addressing the Climate Emergency should be adjusted. This should be focused within existing developed areas and the second paragraph should be amended: "To promote and prioritise renewable energy and low (and zero) carbon development" focused on existing developed or brownfield sites "through greater emphasis on...etc. (or similar). The use of greenfield sites for this purpose should be avoided in line with Objective 11
- Objective 1: Addressing the Climate Emergency should be adjusted. This should be focused within existing developed areas and the second paragraph should be amended:  
"To promote and prioritise renewable energy and low (and zero) carbon development" focused on existing developed or brownfield sites "through greater emphasis on...etc. (or similar). The use of greenfield sites for this purpose should be avoided in line with Objective 12

#### Organisations, including developers, landowners and representatives:

##### Gladman

- Important that the ambitions and objectives in the Local Plan are achievable, and subsequent policies and allocations are capable of making the vision and objectives a reality.  
Gladman support the proposed objectives; delivery of housing must be a key element of the Plan in line with the Government's aim to boost the supply of housing; essential this meets the specific local needs and provides the variety of housing required.

##### Smith and Love on behalf of I & J Hill Partnership

- Objective 7 - A Vitalized Economy should emphasise and make reference to fundamental role Skelmersdale must play in delivering the economic vision and

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

objectives as the main centre of existing employment and focus for economic growth linked to regeneration, re-invention and re-positioning of the town as a commercially attractive location placed centrally between the Liverpool, Manchester and Central Lancashire City Regions.

Smith and Love on behalf of Mr David Little

- Objective 2 should be adjusted to take account of NPPF para 79 that recognises in rural areas such as the Western Parishes, sustainable development can be achieved where there are groups of smaller settlements, and development in one village can support services in a village nearby. Halsall and Haskayne are close neighbours and the individual 'hamlets' comprising Scarisbrick are a closely grouped network centred around Bescar where the majority of services are located.
- Objective 6 should be adjusted to recognise the rural nature of West Lancashire and the new Plan must account for the rural demographic and ensure these settlements do not comprise imbalanced isolated ageing populations. Opportunities must be made for young professionals and families to stay and move into rural areas; can be achieved by small housing allocations in the most sustainable villages, complemented by permissive policies for rural housing exception sites.
- Objective 8 supports growth of village centres to build on vitality and vibrancy; strongly agree and highlight importance of allowing the smaller settlements the right environment to improve existing centres and become more sustainable; housing growth will protect and support existing social aspects of communities and will encourage further economic activity.

WSP on behalf of Seddon Homes:

- Agree with overall objectives especially Objective 2: Sustainable Communities seeking to ensure communities and settlements continue to provide a balanced mix of housing tenures and types.
- This objective should include delivery of housing to meet objectively assessed housing need to ensure the population has access to adequate housing and are not priced out of the market; Sustainable Communities indicator should be clear that development may include infrastructure to meet these indicators; do not object to the ambitions of Objective 5 the Council must consider development viability when assessing whether developments have incorporated climate mitigation and adaption into schemes and other policy objectives.
- Endorse use of recycled and low embodied energy materials but the suitability of materials within developments should be determined on a site-specific basis depending on viability, location, and design. Taking a fabric first approach to building sustainability is critical in finding the best and most appropriate site and scheme specific response to climate change, energy efficiency and sustainability; the mix of housing should recognise growth in the wider rental market including long term family rented accommodation.

Pegasus Group on behalf of Rowland Homes

- Support objectives in principle but indicators lack detail; Objective 2: Types and sizes of new dwellings: would benefit from more clarity on the balanced mix sought; Objective 2: Proportion of new developments close to services/ public transport: would stress that the ability to comply with the indicators will be driven by development needs, and if there are sites that do not meet this requirement, this should not necessarily preclude development; some sites may not be within 800m of a rail station but may still be walkable or accessible via other sustainable transport; ask that a degree of pragmatism be applied in respect of rail travel.

Edge Hill University (EHU)

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Objective 1: Addressing Climate Emergency; supportive of this and is committed to environmental sustainability e.g. through effective resource management and low carbon in new facilities. The University's Carbon Management Plan has reduced its Carbon Intensity.
- Objective 2: Sustainable Communities; support this objective with reference to providing a balanced mix of housing tenures and types, employment opportunities, infrastructure, access to services. Sustainability is one of the University's five strategic aims; Objective 3: A Healthy Population; support this objective - University makes a significant contribution towards improving the health and wellbeing of residents; a number of award-winning facilities are open to the public
- Objective 4: Reduced Inequality; supportive of this objective and we work closely with the local community in various aspects.
- Objective 5: A High Quality Built Environment; supportive of this objective, and remain committed to delivering a high-quality campus environment with a strong emphasis on landscaping and the public realm.
- Objective 6: The Right Mix of Housing; supportive of this objective, and would also note the importance of providing a range of housing types and tenures in order to attract staff and students to the University and to retain graduates within the Borough.
- Objective 7: A Vitalised Economy; broadly support this objective however would ask that the provisions be extended to existing businesses such as the University.
- Objective 8: Vibrant Town and Village Centres; supportive of this objective and the need to adapt in order to reflect the growth of online retail and changes to permitted development rights.
- Objective 9: Accessible Services; supportive of this objective, and through its own strategies such as free travel days, cycle maintenance sessions and travel loans has contributed to a greater uptake of public transportation and sustainable transport modes within the student population.
- Objective 10: A Flourishing Natural Environment; supportive of this objective, the campus has been awarded Green Flag status for nine consecutive years and continues to strive to promote nature whenever possible.

#### Borough, Parish, Town Councillors / Community Groups:

- The tension and possible conflict between objectives needs to be recognised. Objective 2 wishes for sustainable communities. Objective 7 wishes for a vitalised economy attracting new businesses within the 3 City Regions around West Lancashire. If these new businesses simply suck in additional commuters from those regions then it has not contributed to Objective 2. New businesses that can utilise the existing skills of, or training up, local people is preferred as they make West Lancashire more cohesive, resilient and self-sufficient;
- Please avoid American spellings. It is vitalised not vitalized at objective 7.

#### Statutory consultees and other organisations:

##### National Highways

- Objective 2 highlights the importance of sustainable travel in facilitating growth but, where transport network improvements are referred to, important that focus is also placed on the road network, including potential improvements to the SRN [Strategic Road Network]; Objective 9 is in alignment with para 67 of 'The Strategic Road Network – Planning for the Future', with emphasis on choosing locations which minimise need for travel and facilitate use of sustainable transport.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Environment Agency

- Objective 1: Addressing the Climate Emergency - West Lancs contains a significant proportion of England's lowland peat soils, and the land use and management of these soils affects whether the area is a significant emitter of carbon (when drained and ploughed) or act as a significant carbon sink; Objective 1 should be amended to include 'the protection / restoration of peat through new development'.
- Objective 1 also refers to flood risk but focuses on protection against flood risk; it should be encouraging 'resilient people and places'. Recommend rewording and seek to avoid inappropriate development in areas of flood risk. Any appropriate development in flood risk areas will be designed to incorporate suitable resilience and adaption measures to a range of flood sources and look for opportunities to reduce flood risk elsewhere.
- Objective 10: A flourishing natural environment - Support of agriculture and horticulture is required, but should be through positive adaptations and changes in line with Climate Crisis actions and Carbon Net Zero 2050 policy to halt decline of nature by 2030. Recommend rewording to – 'by supporting the adaption of agricultural and horticultural industries – to allow the possibility that nature-based solutions to mitigate climate change impacts are considered and promoted through this objective'.

#### United Utilities

- Pleased to see reference to flood risk and water efficiency in Objective 1: Addressing the Climate Emergency.

#### Natural England

- Welcome Objective 1: Addressing the Climate Emergency and Objective 10: A Flourishing Natural Environment; would like to see these being measured by specific targets.
- Objective 1 could be strengthened by wording which promotes Nature-based Solutions (NbS) to climate change. The natural environment can play a vital role in tackling climate crisis and contributing to Net Zero, as healthy ecosystems take up and store a significant amount of carbon in soils, sediments and vegetation; Tree planting and peatland restoration are the biggest opportunities for NbS, but other habitats and ecosystems can contribute. New woodland takes up carbon from the atmosphere via photosynthesis and peatland restoration stops Greenhouse Gas emissions from oxidation of degraded peat. NbS can also reduce risks to people from climate change e.g. through natural flood management and urban cooling from green and blue infrastructure.
- Objective 10: A Flourishing Natural Environment could be changed to "protecting, restoring and enhancing / aiding the recovery" of the natural environment and biodiversity.
- The term "green [and blue] infrastructure" could be used within Objective 10 and Objective 3: A Healthy Population, which refer to green spaces, linear parks, allotments, waterways, and sport and recreation spaces; would provide a clear link to Policy EH06 - Green Infrastructure & Open Space.

#### Canal and River Trust

- The canal network can play a significant role in helping West Lancashire attain these objectives.
- Objective 1: Addressing the climate emergency; The Trust's waterways can play an important role in addressing climate change, in adaption to current impacts and by providing low carbon options for energy, transport, recreation/tourism and economic growth; would welcome reference to this.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Objective 3: A Healthy Population: Leeds & Liverpool Canal is a multi-functional asset providing access to green and blue space, which can be utilised to provide significant social, economic and environmental wellbeing benefits and promote walking and cycling with the wider benefits of blue health and benefits of being next to water. The plan should seek to maximise access and use of waterways as leisure and recreation routes. Where new development would lead to increased usage, infrastructure improvements should be provided. Providing signage and wayfinding important in maximising use of these assets.
- Objective 10: A flourishing Natural Environment; would welcome the biodiversity value, associated wildlife value and habitat function of the waterway corridor being recognised.

#### Historic England

- Welcome the inclusion of the historic environment within Objective 5: A high quality built environment. However, the objective is incorrect in that it only seeks to protect historic features and settings – it is not clear what this is. NPPF requires plans set out a positive strategy for conservation and enhancement of the historic environment and the objective should ensure that it is better aligned with this and covers historic environment as a whole.

#### Trans-Pennine Trail

- Objective 3 – A Healthy Population - Needs to reference investment to the TPT – and the existence of it.
- Objective 9 – Accessible Services - Increased seating provision will provide regular resting areas for those who cannot walk or cycle far. This can be a great incentive to encourage people to walk or cycle, knowing that they can rest along the way.
- Objective 10 – A Flourishing Natural Environment – should include the TPT.

#### Sport England

- Welcomes objectives but could be expanded to include “Active Design.” e.g. objectives 1-3 could explain how developments could be planned / designed to promote walking, cycling as and public transport rather than promote car use. Objectives 3 and 4 should recognise benefits of access to sport and recreational facilities to tackle health and social inequalities, aligning with the Government's 'Sporting Future' Strategy and Sport England's 'Uniting the Movement' Strategy: <https://www.sportengland.org/why-were-here/uniting-the-movement>; Objective 10: enhancing and aiding the recovery of the natural environment and biodiversity should not be at the expense of use of sports fields and informal recreational activity within these areas.

2. **What are your views on the proposed indicators? Should any be adjusted? Should any be removed? Should any others be added? (Please specify which indicator(s) should be added, and for which Objective(s).)** If you suggest a new indicator, please provide the source of information that the Council could use to access the necessary data at a West Lancashire level (or below) and ideally at least annually. If we are unable to access the data, it is most likely the indicator cannot be used.

18 respondents answered this question in relation to Indicators for the Local Plan 2040 Objectives.

Residents and members of the public:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Objective 5: support the inclusion of indicators showing intervention and reduction in number of heritage assets lost and reduction in number of Buildings at Risk but this must be aligned to policies that would actually deliver this, include affording positive weight to proposals that would achieve those objectives.
- Add indicators to measure the area of agricultural land given over to development and how much brown field areas are developed; to understand how much natural resource is lost each year and how successful the Plan is in prioritising brownfield development.
- there is too little information here as to how the indicators would be used to allow for meaningful comment.
- Add an objective to protect green belt areas from building and prioritising brownfield sites.
- The indicators: "Amount of new employment land / floorspace developed annually" and "Amount of new employment floorspace developed in rural areas annually" are wrong as they are making a positive from developing employment floorspace in areas which are now rural. The success criteria should be employment floorspace alongside / within existing employment areas NOT rural areas. New floorspace in rural areas should be a NEGATIVE outcome.
- Improve all school P.E. facilities primary and junior
- Do not mix older people with starter homes and student housing as they want peace and quiet in their own communities e.g. Brookside & The Alms Houses near St Michael's Church Aughton.

#### Borough, Parish, Town Councillors / Community Groups:

- Add two indicators: Number of HMOs in Ormskirk (WLBC) - a reduction would be a mark of success and "Creating and improving a network of green spaces" e.g. the land area of Borough covered by green spaces?

#### Organisations, including developers, landowners and representatives:

##### Pegasus on behalf of Bloor Homes

- Any specific requirements imposed on developers will need to be evidenced and considered as part of overall viability assessments
- Addressing the Climate Emergency – support this objective and are actively and continually seeking to improve the efficiency of homes during the construction process and the lifetime of the property; if specific targets are to be set, ask that early engagement is undertaken with the housing industry so these are set at achievable and realistic levels
  - Objectives 2 and 9: Sustainable Communities / Accessible Services – support the need to locate development in sustainable locations and to provide a balanced mix of development to ensure the needs of local communities are met locally. Burscough is a highly sustainable settlement in this regard and has all day to day requirements; danger of strict indicators is that any assessment of a specific site or a large number of sites can become binary with 'yes/no' achieved/not achieved results being produced. Other factors such as the physical and environmental attractiveness of a route, line of sight, topography, etc all play a part in determining if people are likely to walk or cycle.
- Objective 3: A Healthy Population –support this objective and note that one of the indicators will be the length of new cycleways and greenways/linear parks provided/improved. We would suggest that an additional indicator is added relating to the provision/improvement of other recreational green spaces and particularly the provision of new sports pitches.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Objective 6: The Right Mix of Housing: support the need for a wide range of housing types and tenures in appropriate locations, including affordable housing and accommodation for older people; would encourage the Council to engage with the housing industry at an early stage once updates to the Strategic Housing Needs Assessment have been completed.

#### Statutory consultees and other organisations:

##### Environment Agency

- Indicator 3 – could include access to green, open space within a certain radius, e.g. 500m or an alternative distance to accord with the 20 minute neighbourhood principle?  
Indicator 10 – recommend use of appropriate Water Framework Directive (WFD) terminology and say good to moderate, not good to fair.

##### Natural England

- Natural England welcome the intention to identify indicators for Plan implementation; important that indicators relate to the effects of the plan itself, not wider changes. The following indicators may be appropriate:  
Biodiversity:
  - Number of planning approvals that generated any significant biodiversity impacts on sites of acknowledged biodiversity importance.
  - Number of planning applications refused or withdrawn in part due to their lack of consideration of biodiversity impacts.
  - Units / hectares of biodiversity net gain (BNG) (on-site and off-site) delivered through planning applications.
  - Hectares of biodiversity habitat delivered through strategic site allocations.Green infrastructure:
  - Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
  - Length of greenways constructed.
  - Hectares of accessible open space per 1000 population.

##### Sport England

- Recommend the following targets that demonstrates an increase in the:
  - number of physically inactive residents becoming physically active.
  - sport and recreation facilities that maximize physical activity opportunities across all age ranges and gender.
  - proportion of new developments with access to existing and new 'greenways.'
  - proportion of journeys to and from community facilities, employment and retail premises that are by walking, cycling and public transport.
  - use of Active Design and maximizing opportunities for physical activity as part of a design review process target.
  - % outdoor sport related applications that accord with the council's Playing Pitch Strategy and any other appropriate sports related strategy.
- Local standards are not appropriate for outdoor sports because they do not take into account sports catchment areas or the variable units of demand for individual pitch/court types.

##### Trans-Pennine Trail

- Objective 3 – Proposed Indicators - A visitor counting device could be installed on the Trans Pennine Trail (TPT) within West Lancs to provide data on its popularity; the TPT also produces visitor survey reports which indicates the level of visitor spend.

**West Lancashire Local Plan 2023-2040**  
**Scope, Issues & Options Feedback Report**

## 7. Strategic Policy Options

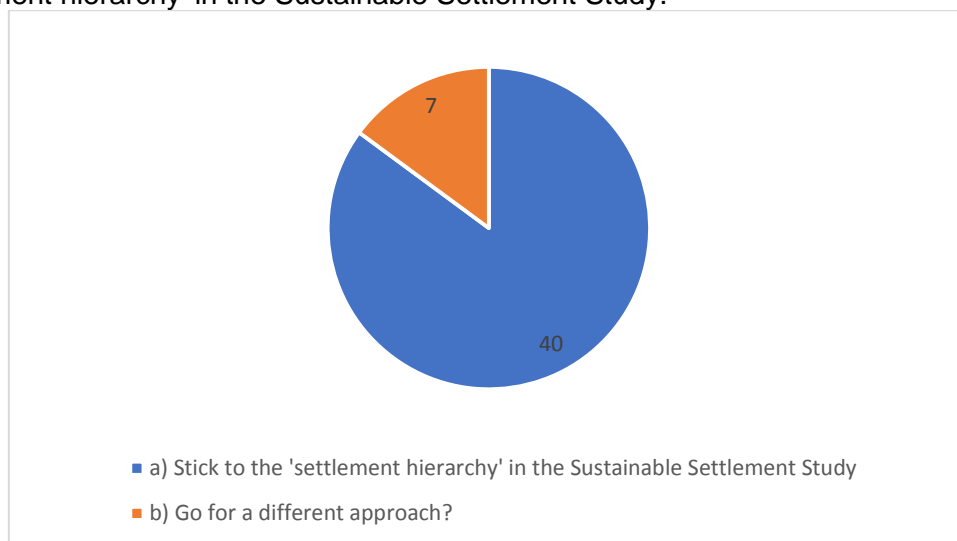
### ST01 – DELIVERING SUSTAINABLE DEVELOPMENT

A total of 61 respondents made comments in relation to ST01 - Delivering Sustainable Development.

#### **Questions:**

1. Do you think we should: a) Stick to the 'settlement hierarchy' in the Sustainable Settlement Study, or b) Go for a different approach? If you answered (b), what should the different approach be?

47 respondents answered the question. 40 respondents supported the Stick to the 'settlement hierarchy' in the Sustainable Settlement Study.



#### Residents and members of the public:

- Neither some flexibility in thinking is needed. Otherwise a straightjacket approach will not deliver sites available.

#### Organisations, including developers, landowners and representatives:

##### Abbott Associates on behalf of Southport Land and Property Group

- Banks should be considered for a new major development site with the new Local Plan which would provide a range of services and facilities providing a sustainable development. A major development or strategic site could be developed at Site BA.021 or BA.022.
- A strategic development or the cumulative development of small-medium sized sites within Banks would support the range of facilities available within the village at present as well as providing new facilities.

##### Emery Planning on behalf of Redrow Homes and Wainhomes North West Limited

- Burscough has had a significant level of development allocated in the adopted Local Plan and therefore Skelmersdale with Up Holland and Ormskirk with Aughton should be the priorities in this plan period to 2040 and then the remainder of development should be directed to the Key Sustainable Villages and Rural Sustainable Villages in

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

West Lancashire having the necessary allocations to meet their needs and their hinterland.

Emery Planning on behalf of Wain Estates Limited and Redrow Homes

- Brown Edge has been and should continue to be a sustainable location for accommodating future growth which was recognised by the level of development proposed in the draft local plan 2050. That designation as a Rural Sustainable Village should be carried forward given there has been no material change to the Council's assessment of Brown Edge between the 2017 and 2021 SST.

Emery Planning on behalf of Wain Estates Limited

- A different approach should be applied (option b) and not agree with the 'settlement hierarchy' set out in the Sustainable Settlement Study 2021.
- The Sustainable Settlement Study 2021 also places undue focus on existing service provision, without considering where development could enhance or maintain the vitality of rural communities.
- There needs to be consideration of development needs (such as the need for affordable housing within certain parts of the borough) and how development could enhance or maintain the vitality of the settlement. That is a vital strand of evidence which is missing from the current evidence base.
- The settlement is not comparable in terms of sustainability to say Aughton, which is also listed as a local service centre. Parbold is an eminently sustainable location for accommodating future growth and plays a key role in serving a rural hinterland.
- Furthermore, new development, of which there has been very little over recent years, will enhance and maintain the services currently on offer, in accordance with paragraph 79 of the Framework.

Emery Planning on behalf of Redrow Homes and Wainhomes North West

- Agree that the greatest amount of development, and the greatest range of development would be at the largest settlements at the top end of the hierarchy which are Skelmersdale with Up Holland and Ormskirk with Aughton.
- Development should be distributed across West Lancashire, but the greatest amount should be at Skelmersdale with Up Holland and Ormskirk with Aughton, which are the two main settlements in the Borough.
- Burscough has had a significant level of development allocated in the adopted Local Plan and therefore Skelmersdale with Up Holland and Ormskirk with Aughton should be the priorities in this plan period with the remaining settlements in West Lancashire excluding Burscough having the necessary allocations to meet their needs and their hinterland.

Cockwill & Co on behalf of Melford Construction

- Not agree that Banks has been downgraded in the settlement hierarchy. The settlement offers a large amount of community facilities, retail space and good accessibility and transport links and therefore could accommodate more development.
- The flood zone designation of FR3 is erred and this should be challenged as to discount a 400 year old flood defence is majorly flawed.

WSP on behalf of Seddon Homes Ltd.

- Seddon supports a proposed settlement hierarchy within the Local Plan which mirrors the sustainable settlement hierarchy set out in the Sustainable Settlement Study 2021 which defines Tarleton as a Tier 2 Key Service Centre.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

Lichfields On behalf of Crompton Property Developments Ltd

- CPDL agrees with the proposed designation of Burscough as a Key Service Centre and welcomes the acknowledgement that it is well served in terms of services and infrastructure.
- CPDL agrees with this approach and supports the proposed Settlement Hierarchy set out within the SSS.

#### **2. Is there anything in our policy approaches that you particularly support (or disagree with)?**

22 respondents answered this question.

#### Residents and members of the public:

- The information provided has been affected by developers in that some information regarding accessibility of areas is incorrect.
- Assigning a main town across a county boundary make sense geographically but need access to services (cannot find GP accept patient living in Shirdley Hill).
- Concentrating further major housing builds on the more sustainable areas
- UpHolland should be linked with Skelmersdale, Aughton with Ormskirk
- Agree the broad policy of maintaining the settlement hierarchy but there are dangers to concentrating development on larger settlements, not only for the growing settlements themselves.
- Sounds good to prioritise sustainability wherever possible
- Development should be sustainable - to be adjacent settlements which have the support services in the area.
- The settlement hierarchy approach is far better than the previous plan.
- Support the approach emphasising the importance of new developments being located in areas that already have good facilities, rather than in areas with few facilities.
- Agree with the principal of putting new developments in places where there are already a good range of services, facilities and infrastructure and less development in areas with few services and facilities.
- It is important to preserve the rural nature and characteristics of West Lancs.

#### Borough, Parish, Town Councillors / Community Groups:

- Need affordable homes for the younger generation and affordable, purpose built for our senior citizens. Developers must not be allowed to build on Flood Areas.
- Bickerstaffe Parish Council supports the development of affordable housing and starter-homes in line with ST01 the Settlement Hierarchy within existing settlements. Junction 4 of the M58 is a more suitable location for employment land rather than that at Junction 3 which is the green gateway to West Lancs. Industrial large-scale warehouses and other employment development would detract from the visual amenity of this area.

#### Organisations, including developers, landowners and representatives:

Gladman

- Gladman support the preferred approach.
- Support the acknowledgement that the greatest amount and range of development will be directed towards the most sustainable locations situated at the top of the settlement hierarchy.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- The Council should seek to direct housing and employment growth towards these towns to ensure future sustainability and vitality of services and facilities is maintained.

#### Edge Hill University

- EHU supports the identification of Ormskirk as a “Main Town” in the SSS, which reflects its prominence as administrative centre in the Borough with a high level of service provision including a commercial centre, a range of convenience and comparison retail, employment, primary, secondary and higher education (including one of the Borough’s primary economic drivers in EHU), community and health facilities, and excellent strategic transport links.

#### Smith and Love on behalf of I & J Hill Partnership

- Strongly support the preferred approach.
- Do not necessarily agree that the hierarchy should be changed from the adopted Plan
- The growth to be apportioned to each town must be in scale with size, characteristics and attributes of each town, and the particular issues and needs of each to be addressed by the Plan.

#### J10 Planning on behalf of W Ainscough Esq

- Enable sustainable settlements to accommodate larger amounts of growth.

#### Smith and Love on behalf of Mr D. Little

- We support the preferred approach, in common with the adopted Plan
- Strongly support the identification and inclusion of Southport as a Tier 1 Main Town (within Sefton) within the proposed settlement classification in the Sustainable Settlements Study 2021 evidence paper.
- Generally support the preferred approach.
- Minor alterations to the methodology and wording of the Settlement Hierarchy are required to ensure that it is fit for purpose as a basis for meeting needs in rural areas such as the Western Parishes.
- To plan to not locate or permit sufficient housing growth to come forward in the least sustainable rural villages because they are not sufficiently accessible by public transport will exacerbate their decline and the unbalancing of their communities.
- As part of the sustainable settlement study, the village of Halsall is considered to be a Tier 4 settlement, while villages such as Haskayne and Bescar (Scarbrick hamlets) are grouped under Tier 5 and regarded largely as ‘unsustainable’. Strongly disagree that these settlements should be included within Tier 5, as they are connected to urban centres by public transport and each provides at least one service.
- While these villages do not provide the full range of services that are offered for example in Tier 3 settlements, they are, nevertheless established residential areas and local communities whose needs must be met by the new Plan. Paragraph 79 of the NPPF recognises that a group of smaller villages supporting services in another village is included as part of sustainable development within rural areas. As settlements such as Haskayne, Halsall and Bescar (Scarbrick hamlets) support adjacent and surrounding villages, it is contrary to national policy to categorise them as being ‘unsustainable’ or to refer to sites as ‘not sustainable development’ solely because travel between other settlements will be required. The NPPF (paragraphs 78 and 79) makes clear that other factors must come into play (for example social and economic factors) when assessing if development is sustainable.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Statutory consultees and other organisations:

##### Environment Agency

- The most sustainable approach is to seek to locate development in areas with existing services, facilities and infrastructure that can accommodate the growth.
- There should be less development in areas that do not have the necessary services, facilities or infrastructure and in areas that have them but cannot accommodate further growth due to constraints that cannot be resolved.

##### United Utilities

- United Utilities is supportive of an approach which seeks to focus growth in the most sustainable settlements and that it is good practice to ensure that growth is proportionate to the size of the settlement.

3. Do you have any other comments on this topic?

34 respondents answered this question.

#### Residents and members of the public:

- Why is the parish of Bickerstaffe referred to as Stanley Gate which isn't a recognised area?
- Sustainable settlement study - not included Bickerstaffe village which has a church, school and parish field. Not the same place as Stanley Gate. Also, Barrow Nook, which is just houses now, but there are about 30-40 dwellings.
- To maintain vibrant smaller communities, with schools, small shops and social venues, it is vital to allow some organic development and continue to support services, which the settlement size might not on the face of it warrant. Changing technologies and ease of transport threaten to leave smaller settlements without any 'community' as young families are driven out by lack of affordable housing and retirees dominate the housing stock as there is no provision to downsize or move into appropriate smaller houses. Services can become centralised on larger settlements and this process can easily become self perpetuating without positive action.
- Development should be sustainable. The best way to achieve this is for it to be adjacent settlements which have the support services in the area rather than creating a challenging new artificial one that is isolated with no shops, health facilities.
- It makes sense to add housing to places that have infrastructure which can be adjusted expanded, but it need to be recognized that as centralize housing in this way we also accommodate the new infrastructure that will be needed for protected/closed renewable energy supplies, and this does mean reserving suitable pockets of land for e.g. solar, heat arrays, energy centres.

#### Borough, Parish, Town Councillors / Community Groups:

- Green Belt land is expensive therefore any homes built thereon are also expensive, we are an aging population most of whom need affordable purpose built properties.
- The idea behind the use of a Settlement Hierarchy is supported and the four levels indicated offer a range of settlement types that reflect the varying levels of accessible services and facilities across the Borough.
- Should the principle of the hierarchy be adopted and respected then it is supported and will prove valuable in ensuring that development is evenly attributed across the Borough and is focussed where services are accessible and of sufficient scale to ensure development is sustainable.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- If the Settlement Hierarchy is to be adopted in the new Local Plan then each level of the hierarchy should be supported by a clear statement of the applicable criteria that define it and provides guidelines that supports a sustainable pattern of development for each level.
- The only designated settlement in Bickerstaffe included at the lowest level of the proposed hierarchy is at Stanley Gate. No sites have been included for consideration around this location and would therefore not give rise to development that accords with the intended hierarchy.
- Section 11 of the National Planning Policy Framework sets out what this means for plan-making and decision-taking. It is clear from this that it is the purpose of the Local Plan to promote a sustainable pattern of development that seeks to meet development needs; align anticipated growth with the appropriate infrastructure growth; IMPROVE the environment; and mitigate climate change and adapt to its effects. A new plan should therefore be very clear and unambiguous so that future decision-making reliant on the detail within it can be deemed to be sustainable.
- The principle of a Settlement Hierarchy is sound and the four levels indicated offer a range of settlement types that reflect the varying levels of accessible services and facilities. However, it should be noted that the idea of a settlement hierarchy was part of the now aborted 2018 Local Plan and so the proposed development of over 16,000 homes and significant employment land expansion clearly failed to respect the principle of the hierarchy, with large areas of development being outside the settlement boundaries of the highest ranking areas.
- If the Settlement Hierarchy is to be adopted in the new Local Plan then each level of the hierarchy should be supported by clear detailing of the applicable criteria that define it and provides a definitive narrative that supports a sustainable pattern of development at each level.
- The Settlement Hierarchy should be adhered to.
- To promote sustainable development, reduce carbon-dependent activities and protect and enhance the areas nature conservation assets and green spaces.

#### Organisations, including developers, landowners and representatives:

##### Sat-plan on behalf of Gleeson Homes

- Generally agree with the settlement hierarchy approach. It is common sense for the higher levels of growth to be directed towards the Key Service Centres such as Skelmersdale, Ormskirk and Burscough that are generally more accessible and therefore sustainable.
- Agree with the general context and description of services and accessibility in in the Settlement Study Skelmersdale which clearly reinforces their characteristics as a Key Service Centre to allow the Council to use this evidence to confirm a sustainable settlement hierarchy for the borough within the Local Plan. Strongly support that higher levels of growth should be directed to such centres.

##### Sat-plan on behalf of Stewart Milne Homes

- Generally agree with the settlement hierarchy approach. It is common sense for the higher levels of growth to be directed towards the Key Service Centres such as Skelmersdale, Ormskirk and Burscough that are generally more accessible and therefore sustainable.
- Agree with the general context and description of services and accessibility in in the Settlement Study for Ormskirk with Aughton which clearly reinforces their characteristics as a Key Service Centre to allow the Council to use this evidence to confirm a sustainable settlement hierarchy for the borough within the Local Plan. We strongly support that higher levels of growth should be directed to such centres.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Gladman

- It is acknowledged that at this stage of the Local Plan's preparation, there is no consideration of how housing and employment land will be distributed around West Lancashire and therefore it is currently unclear what direction the Council will take in allocating sites. The Council should ensure that a wide range and mix of sites are allocated to meet identified housing needs. Should the Council allocate strategic level sites as was previously the strategy in the now withdrawn draft Local Plan Review, then these should be supported by a range of sites, by size and type to ensure the Local Plan delivers the borough's identified housing needs.

#### Edge Hill University

- Ormskirk's identification as a Main Town should be reflected in the Local Plan strategic policies, spatial strategy and land allocations as focus for the growth of the Borough to 2040. It will be critical to identify the housing and employment land to support the role of Ormskirk as a Main Town and to underpin opportunities for its long-term growth. Failure to do this could lead to unsustainable patterns of growth and exacerbate the challenges and issues that the Borough is facing.
- Of course, it will also be critical to identify sufficient land to support the growth and development of EHU to meet its development needs and in order to sustain and enhance the economic, social, education and recreational benefits the institution provides the town and the wider borough.

#### Emery Planning submitting on behalf of Redrow Homes and Wainhomes North West

- Noted that there is no Policy ST02 at this stage (housing and employment land requirements, and distribution of development around West Lancashire).
- There is strong support from the Government for pursuing a housing requirement in excess of local housing need as determined by the standard method. The examples listed by the Government closely mirror the circumstances in West Lancashire for pursuing a higher requirement than local housing need. In particular, there is a need to secure economic growth, and to align housing and economic strategies. Consideration should also be given as to whether it is necessary and/or appropriate to help to meet any unmet needs from the Liverpool City Region, and in particular neighbouring Sefton where constraints to meeting housing needs have previously been identified.
- Importantly, pursuing a housing requirement based upon the standard method would result in affordable housing needs not being met.
- As per the Council's most recent published assessment, there is a net annual need of 120 affordable houses per annum in West Lancashire. The Council's monitoring shows that this need has been met in each of the past 2 years (following years of under-delivery), but that has been in the context of total delivery of 622 total completions in 2019/20 and 461 total completions in 2020/21 (therefore, approximately 25% was delivered as affordable housing). If approximately 25% of all housing is delivered as affordable housing moving forward, then a housing requirement of at least 500 dwellings per annum is required to meet the level of identified need for affordable housing.
- The Council has therefore clearly set out that pursuing a housing requirement in line with the standard method would have a significant adverse impact upon the economy and social sustainability. This plan presents a clear opportunity to drive economic growth and address demographic issues prevalent in West Lancashire, such as an aging population, and the need for affordable housing.
- There should be consultation on the housing requirement and the SHELMA, whether that is a formal 6-week public consultation or a shorter focused consultation on the SHELMA.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- At this stage we support the proposed plan period to 2040 provided the plan is adopted by 2025. Both sites proposed by our client's would make a significant contribution to meeting housing needs by 2040 so the LPA can be confident that their allocation will enable a robust plan to be prepared and adopted.

Savills UK Ltd on behalf of Harworth Plc.

- Harworth considers an entirely appropriate plan-led strategy would incorporate both a settlement-led hierarchy approach, and also allocations for new sustainable mixed-use development, delivering both employment and housing opportunities, and incorporating sufficient social and hard infrastructure.
- The Council have identified through the preparation of the previous Local Plan review and the current Local Plan covering the period up to 2040 that there is a need for employment to be well-situated relative to housing areas to ensure sustainability, but also that the upward trend in HGV trip generation is causing wider issues for the local road networks.
- Highlight the significant need to increase logistics floorspace across the north-west of England, an approach to deliver employment uses adjacent to the existing strategic highway network, alongside housing and social infrastructure will enable the Borough to create significant levels of new jobs, in a sustainable manner.
- Harworth would again like to draw the Council's attention to the Vision Document supporting this submission, which sets out in greater technical and masterplanning detail, the ability to deliver a sustainable mixed-use development at Rotherham's Green.

Lichfields on behalf of Taylor Wimpey Limited

- Taylor Wimpey broadly agrees with the settlement hierarchy set out within the Sustainable Settlement Study and the focus of new development in the key service centres. However, it is imperative that the Council recognises the importance of delivering homes across the Borough and ensures that sustainable levels of growth are apportioned to other sustainable rural settlements to protect their vitality and preserve existing services.

Turley on behalf of David Wilson Homes

- David Wilson Homes supports the presumption in favour of sustainable development in accordance with paragraph 11 of the NPPF.
- It also supports the use of a settlement hierarchy to guide the location of development, and in particular, focusing the greatest amount of development within the larger settlements at the top end of the hierarchy. DWH welcomes the WLBC's intentions base the settlement hierarchy on the 2021 Sustainable Settlement Study.
- DWH supports the 2021 Sustainable Settlement Strategy's identification of Ormskirk and Aughton as a single "continuous settlement" and this approach should be taken forward into the settlement hierarchy in Policy ST01 of the New Local Plan.
- DWH supports the identification of Ormskirk and Aughton as a "main town".
- Given Ormskirk's and Aughton's identification as one of the main towns in the 2021 Sustainable Settlement Study, DWH considers that they should be identified as a single settlement on the top tier of the settlement hierarchy in the New Local Plan and should therefore be the main focus for development. Over-reliance on the housing development in Skelmersdale should be avoided given the viability issues in the settlement (as referred to in the Scope, Issues and Options consultation document). Over-reliance on Skelmersdale could result in the housing needs of the Borough not being met. A higher proportion of housing should therefore be delivered in Ormskirk and Aughton where there are not the same viability issues.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

Asteer Planning LLP on behalf of Richborough Estates Ltd

- Richborough fully supports the identification of Ormskirk as a “Main Town” in the SSS, which reflects its prominence as administrative centre in the Borough with a high level of service provision and excellent strategic transport links.
- It will be critical to identify the housing and employment land to support the role of Ormskirk as a Main Town and to underpin opportunities for its long-term growth. Failure to do this could lead to unsustainable patterns of growth and exacerbate the challenges and issues that the Borough is facing.
- The conclusions of the SSS identify ‘Aughton’ as separate to Ormskirk and in Tier 3 (Local Service Centre) of the settlement hierarchy, which diverges from the approach in the adopted 2013 Local Plan and the 2017 Sustainable Settlement Study; which considered ‘Ormskirk with Aughton’ a functional and contiguous settlement area. Whilst Richborough does not object to this approach, it is important that the role of Aughton as a functional part of Ormskirk is reflected as the policy detail is developed, particularly along the northern edge of the settlement where it ‘couples’ together with Ormskirk – which is functionally and geographically very different from the southern extent of Aughton.

Acland Bracewell and CBRE Ltd on behalf of Tarleton Estates Ltd and Lilford 2005 Ltd (The Lilford Estate)

- Tarleton is the largest and most dominant service centre in the Northern Parishes and is a highly sustainable location for new residential and housing development. It accommodates the vast majority of housing in the region and contains the greatest concentration of services, including a designated Large Village Centre. It performs a strategic role in the north of the Borough and serves a wider area in terms of retail and related services and employment provision.
- The Lilford Estate therefore strongly supports the conclusions of the Sustainable Settlement Study (2021) which designates Tarleton as a Tier 2 ‘Key Service Centre’ defined as having a good range of retail and services, primary school and secondary schools, local employment, GPs, playing areas and regular transport provision. In developing the Settlement Hierarchy Policy with the emerging Local Plan the Council should have regard to this study and designate Tarleton as a Tier 2 ‘Key Service Centre’, directing a significant level of new development to the village in order to meet the needs of the Northern Parishes and Borough more widely.
- Tarleton contains a primary and secondary school, GP surgery, recreational provision, public transport services, and services and amenities typically found in Key Service Centres. The Settlement Study (2021) acknowledges an undersupply in employment land provision in Tarleton and this is critically needs addressing in this Local Plan. The Estate submitted detailed evidence to the Preferred Options (2018) reps, which demonstrate this undersupply, and that there needed to be an increase in employment land provision. It is considered this position will have worsened, since 2018, given there has been no delivery over the last local plan, and the only allocated site (Greaves Hall) in Banks failed to provide any employment delivery, as it was a windfall site. The Lilford Estate will be providing further evidence to demonstrate the current undersupply and employment needs for Tarleton and the Northern Parishes as part of future representations.
- Furthermore, there is an assumption in the Settlement Study 2021 that Tarleton is constrained by both highways and drainage, without any evidence produced by WLBC to demonstrate the validity of this assumption. The Lilford Estate have submitted successive representations to previous Local Plans (2012 – 2022) producing evidence from consultants, which have clearly demonstrated that there are no highway or drainage constraints or any other constraints that would prevent the delivery of the sites promoted in the Tarleton Masterplan.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- In terms of other sites in the settlement hierarchy, The Lilford Estate acknowledges and strongly supports the Study's findings in respect of Banks which is identified as a Tier 4 'Rural Settlement with Limited Services'. The village is situated within Flood Zone 3 and lacks many services. This should be given significant weight when apportioning future development distribution.

#### Pegasus Group on behalf of Bloor Homes

- Burscough is a highly sustainable location and therefore significant growth should be planned in and around this settlement as part of the emerging Local Plan, given its sustainable location and ability to accommodate growth. It is also a very good example of a 20-minute neighbourhood and most of the residential areas within the settlement fall within a 20 minute walk to the town centre and other key services. This is also the case for the Bloor Homes site, which is significantly enclosed by the existing settlement boundary and has excellent access to the town centre and other key services. As such, the town has continued scope to grow sustainably and should therefore feature highly within the Settlement Hierarchy.

#### WSP on behalf of Seddon Homes Ltd.

- The Sustainable Settlement Study (2021) lists Tarleton as the most sustainable settlement of the Northern Parishes due to its location and range of services. This is a clear indicator that Tarleton is able to accommodate more development in the next plan period.

#### Pegasus Group on behalf of Rowland Homes

- Fully support the retention of Skelmersdale within the top tier of the settlement hierarchy, recognising that it is the largest settlement in the borough with good capacity for future growth; and raise no issue with Up Holland being decoupled from Skelmersdale and reclassified as a Tier 3 settlement, which will also allow more limited future growth.

#### Pegasus Group on behalf of Story Homes

- Burscough is a highly sustainable location and therefore significant growth should be planned in and around this settlement as part of the emerging Local Plan, given its sustainable location and ability to accommodate growth. It is also a very good example of a 20-minute neighbourhood and most of the residential areas within the settlement fall within a 20 minute walk to the town centre and other key services. This is also the case for the Story Homes site, which is significantly enclosed by the existing settlement boundary and has excellent access to the town centre and other key services. As such, the town has continued scope to grow in a sustainable manner and should therefore feature highly within the Settlement Hierarchy.

### Statutory consultees and other organisations:

#### United Utilities

- Once more details are known on development sites, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.
- Where applications are submitted on land which is part of a wider allocation, applicants will be expected to submit allocation-wide infrastructure strategies to demonstrate how the site will be brought forward in a co-ordinated manner. The strategies shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases and ensure coordination between phases of the development over lengthy time periods and by numerous developers.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

Where necessary, the strategy must be updated to reflect any changing circumstances between phase(s) during the delivery of the development.

#### Natural England

- In accordance with the NPPF, the new Local Plan should allocate develop to land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA), to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

#### National Grid

- To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

#### CPRE, The Countryside Charity

- Broadly agrees with those recommended, however suggests making the climate the highest priority as it is due to its effects of flooding to most of West Lancashire.
- Recommend that the Climate Change Committee's Guidance for Local Authorities on its 6th Carbon Budget, and the RTP1 and TCPA guide for local authorities on planning for climate change can help show the necessary pathway for the Council to follow.
- Hope the planning reform will make the NPPF more balanced and as a result more sustainable.

#### Lancashire County Council

- This policy should reference the strategic objectives of the district and in particular the sustainable transport agenda and how they would correlate with emerging settlements.

### **ST03 – RESPONDING TO THE CLIMATE EMERGENCY AND CREATING ENVIRONMENTAL SUSTAINABILITY**

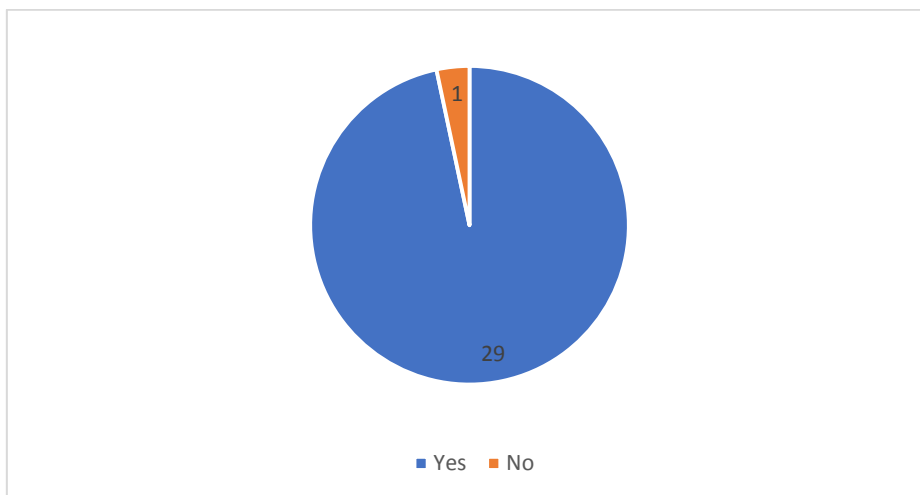
A total of 42 respondents made comments in relation to ST03 - Responding to the Climate Emergency and Creating Environmental Sustainability.

#### **Questions:**

4. Do you agree that the climate and biodiversity emergency should be central to the Local Plan?

30 respondents answered this question. 29 or 97% agreed that the climate and biodiversity emergency should be central to the Local Plan and only 1 or 3% of respondents had a different view.

Scope, Issues & Options Feedback Report



5. Any additional comments?

20 respondents answered this question.

Residents and members of the public:

- There is a worry that the Greater Manchester Clean Air zone could cause more traffic (vans and HGV's) to go through the already busy road of Appley Lane North in effort to avoid the Greater Manchester Clean Air charge when it comes into effect.
- Please start with some aspects of support for environmental and biodiversity which are found voluntarily in "higher" quality developments and make them mandatory in all developments. Bird nesting, bat roosts, protection of trees and hedging rather than replacement, good natural replanting schemes, subdued local lighting, require all development to make a positive contribution to the environment and stop letting environmental planning conditions be appealed to save the developers' costs.
- Support retaining prime agricultural land to be farmed within the existing schemes to protect the environment long term.
- To promote active travel a network of cycle routes, separate from roads, possibly based in existing footpaths, should be developed between and within urban and rural settlements, Signage of existing cycle routes within Skelmersdale should be provided.
- Low lying areas within the Alt Crossens catchment area should be excluded from all development as the flood risk, particularly with rising sea levels and lack of funding for pumping is high.
- West Lancashire has a national importance to climate change due to the high proportion of the best and most productive land is of national importance in relation to food security and carbon storage.
- It is important but not central to the LP - a small authority will have negligible impact on global events. Rather West Lancs should concentrate on more important matters and support the communities in the borough
- Leave Moss Land and Grade 1 Agriculture land alone for CO<sub>2</sub> absorption and local self sufficiency

Borough, Parish, Town Councillors / Community Groups:

- Parbold suffered the full cost of climate change. Have a serious problem with Riparian Ownership. Lack of maintenance by all involved is a major problem. LCC



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

need to ensure that all Riparian Owners including LCC know their responsibilities and act accordingly.

- The preferred approach to introduce a new strategic policy is supported.
- There may be risk in this approach that one policy may have competing measures with other policies in the Local Plan and may therefore introduce ambiguity into any future decision-making process.
- Introducing an overarching, strategic policy therefore has to provide clarity as to the priority of climate change considerations and must remove the risk of conflict and ambiguity between policy areas addressed separately in the Local Plan.
- The policy must also address emissions from all sources in the Borough, private and commercial and should not be focussed solely with the Council's own direct carbon emissions.
- Investigating fully any future planning applications for Simonswood Industrial Estate and refusing any which would have a detrimental effect on the Parish and the quality of life of our Residents. Help regenerate Simonswood Peat Moss.
- Every development should be considered in terms of "net gain" and any offsetting should be done within the locality of the development and not elsewhere.
- All new houses must have external electric charging points, should be energy efficient and include small scale renewable energy generation.
- All new commercial/industrial development should include solar panels on all south facing roof structures and include provisions for rainwater harvesting and heat pumps.
- For major developments there should be a robust travel plan included within the planning application which should demonstrate how the developer has incorporated sustainable transport measures, in particular pedestrian and cycle provision.

#### Organisations, including developers, landowners and representatives:

##### Gladman

- Gladman are supportive of the overarching aim of the proposed approach which seeks to increase biodiversity to ensure environmental sustainability. The Council should seek to support development opportunities which can provide significant biodiversity net gain such as 'land west of Southport Road, Ormskirk'.

##### Lichfields on behalf of Taylor Wimpey Limited

- **The** inclusion of a strategic policy on Climate Change is welcomed however, the policy needs to provide overarching principles and ensure it does not restrict development with a prescriptive and lengthy policy. Climate change is an important subject for many people and work is well underway to ensure West Lancashire continues to meet its Climate Change targets, and Taylor Wimpey would seek to actively support the Council in meeting its aspirations.
- The proposed sustainable extension of Appley Bridge will allow extensive wildlife enhancements and result in a net biodiversity gain. There is an opportunity for a further parcel of land located south of Finch Lane be incorporated into the development proposals for recreational use, allowing greater accessibility to the surrounding greenspaces.

##### Turley on behalf of David Wilson Homes

- DWH supports the proposed inclusion of a strategic policy that covers climate change and environmental sustainability. Any such policy however should retain flexibility and should be informed by a viability assessment of the New Local Plan. It should not impose requirements on developers that exceed national standards / requirements.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Statutory consultees and other organisations:

##### Trans Pennine Trail

- This policy should also note the importance of the existing Trans Pennine Trail as a major sustainable transport route through the borough.

##### Sport England

- Generally supportive. However, the 're-wilding' of open spaces, planting of trees, etc should not have an adverse impact on the functionality of a playing field as this would in turn have adverse impact on sport and recreation as well as on people's health and social wellbeing.

#### **6. Is there anything in our policy approaches that you particularly support (or disagree with)?**

9 respondents answered this question.

#### Residents and members of the public:

- The outline of the policy sounds good. Careful thought needs to be given and need to avoid knee jerk reactions, for example ensure that any blanket tree planting is done in appropriate locations only and doesn't take prime agricultural land out of production because a large organisation see an opportunity to hit its own net zero targets. Solar farms should only be located where there is no better use for the land.
- Disagree that "low carbon and renewable energy generation" should be an aim for the council.

#### Borough, Parish, Town Councillors / Community Groups:

- Parbold need action now and there are areas that have problems with surface water flooding. The LLFA and EA need to act.
- The specific measures quoted are supported as an overarching principle but the reality of delivering these between now and 2040 is perhaps unrealistic. The policy should also endeavour to consider how the total energy demand from homes and businesses in the Borough can be derived from only renewable sources.
- A description of how net gain is measured with parameters is needed – there should be a 10% minimum and 20% maximum. To reach the Borough's carbon emission targets, all moss land should be protected from disturbance due to its carbon-capturing qualities. Skelmersdale would not appear to need any more affordable homes due to the number of vacant properties currently. Brownfield sites should be considered first before any other land is considered, with evidence of this process being carried out methodically and meticulously. New housing should be within existing settlements. No Greenbelt land should be used for development. Biodiversity assessments should be carried out not only to protect existing species but to encourage new species.

#### Organisations, including developers, landowners and representatives:

##### Emery Planning on behalf of Redrow Homes and Wainhomes North West

- Without an actual policy to comment on it is difficult to make a meaningful response, however such a policy, for example on energy/water efficiency need to be consistent with the national agenda and any policy over and above that would need to be justified with viability considerations. However, it is clear that the specific measures

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

highlighted above are principles which our clients work to or will consider going forward through emerging or new legislation, for example as biodiversity net gain becomes law.

Lichfields On behalf of Crompton Property Developments Ltd

- CPDL supports the inclusion of a new strategic policy.
- The Borough is already well on the way to reducing CO2 emissions in line with targets however, it is clear that additional work is required to ensure climate change targets are continually met.
- Nonetheless, it is important that the wording of any policy surrounding climate change provides overarching principles for new development, rather than being a prescriptive policy which has the potential to restrict development and the innovative ways in which climate change solutions are being incorporated into developments to reduce emissions.
- The practical consequence of any requirements will need to be carefully considered, including any impact upon the deliverability of new development, to avoid any unnecessary or burdensome requirements.

#### Statutory consultees and other organisations:

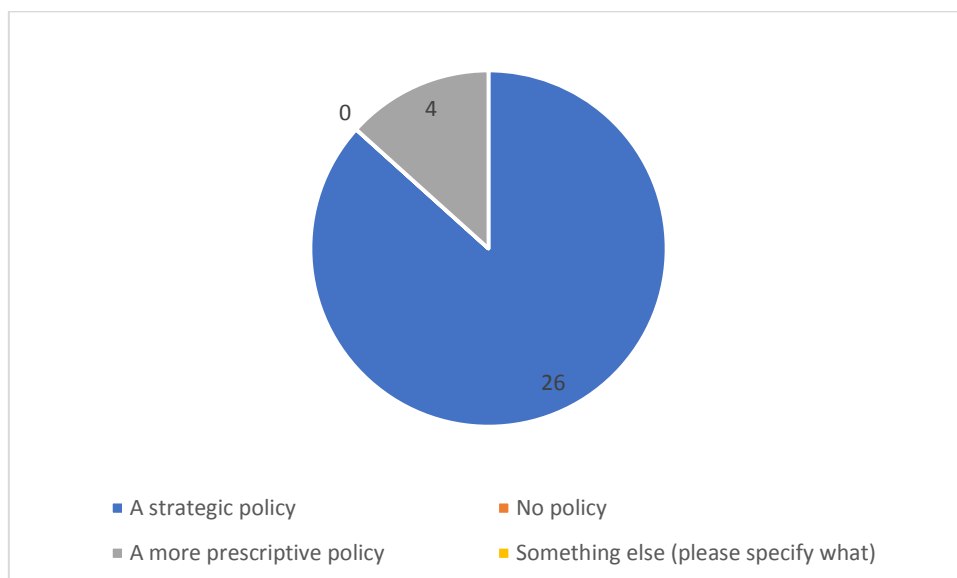
Sport England

- Applying Sport England's 'Active Design' principles to where people live, work and play, and encouraging more active lifestyles would be a major contribution to a carbon-free future. Furthermore, Sport England's Active Design checklist is a good tool in helping to tackle climate change.

#### 7. Which of our options do you most closely support?

- A strategic policy
- No policy
- A more prescriptive policy
- Something else (please specify what)

30 respondents answered this question, 26 or 87% supported a strategic policy covering climate change and environmental sustainability and 4 or 13% supported a more prescriptive policy.



**Scope, Issues & Options Feedback Report**

**8. Do you have any other comments on this topic?**

24 respondents answered this question.

Residents and members of the public:

- The strategic policy does need to be clear and detailed, setting out what is required of employers and providers of services
- Solar panel farms on viable agricultural land should be avoided. Solar generation sites should be combined with existing or future industrial areas.
- The use of green roofs should also be favoured to offset loss of vegetation from developments.
- Support a strategic focus on renewables, but even within this WLBC needs to be specific about a drive towards local grid reinforcement and protection so that settlements become as independent as possible in their energy use & production. This means land allocations to suit, and that needs to be made clear from the start.
- SuDS drainage and grey & rainwater usage.

Borough, Parish, Town Councillors / Community Groups:

- If we do not deal with the climate emergency some areas will revert back to a flood plain, some of our estates were built on the flood plain.
- The measures will need to be taken to mitigate the impact of climate change.
- Keep the green belt.
- This is a significant policy topic with many facets that need to be coordinated effectively if there is to be an impact in terms of carbon emission reduction and achievable, and enforceable, mitigation measures. A new, strategic policy should therefore be more than a statement of ambition and must provide a clear framework that future development must comply with in order for it to be deemed acceptable and sustainable. The policy should not only deal with how the council will achieve its own direct carbon emissions, but must also address emissions from all sources in the Borough, private and commercial, and set out how the measures included in individual policies will be actioned and enforced.

Organisations, including developers, landowners and representatives:

NJL Consulting on behalf of owner/developer

- Any strategic policy needs to also be mindful that development projects may only be able to deliver on some of the climate emergency objectives. Other elements need solutions that are far more strategic and not just site specific.

Savills on behalf of Harworth Plc.

- Support the inclusion of a policy on climate change and environmental sustainability.
- Support the current preferred approach, and strongly recommend that the policy is not drafted in an overly prescriptive manner. The Local Planning Authority should progress a policy which includes Biodiversity Net Gain, but should certainly not seek to go beyond the 10% Biodiversity Net Gain figure that Central Government consider to be reasonably implementable. The figure has been arrived at following extensive consultation and seeking to go further risks issues in relation to practicability and development viability.
- The use of the term 'biodiversity emergency' within the consultation is not a position set out within national guidance. As such any future draft of the Local Plan should omit this term from both policy and supportive text.

Asteer Planning LLP on behalf of Richborough Estates Ltd

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Richborough broadly supports the need to address climate change at a strategic policy level.
- It is important that the individual development management policies that implement measures for climate mitigation and adaption are realistic and are tested against viability indicators, to ensure that sustainable growth and the delivery of homes for future generations is not delayed.

#### Pegasus Group on behalf of Bloor Homes

- Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
- No specific policy has been drafted at this stage but the suggested preferred approach is to have an overarching strategic policy and then more detailed policies setting out how the Council's ambitions to get to net zero can be embedded into considerations for development and could include policies relating to: Low carbon and renewable energy generation, Reducing vehicle emissions, Encouraging active sustainable travel, Improving energy and water efficiencies in new buildings; Maximising opportunities to improve green infrastructure, wildlife habitats and biodiversity net gain; and minimising food risk. The Council's critical responsibility is to consider how future climate change impacts could impact on the ability of certain locations to grow and accommodate new development.

#### Pegasus Group on behalf of Rowland Homes and Story Homes

- Support the preferred approach, as it is a critical issue that requires some form of policy provision now; however this needs to be flexible enough to adapt to changing requirements in national policy and the wider Building Regulations regime, as well as viability and other site specific issues on individual schemes. A strategic policy such as the one proposed could then be supplemented by an SPD if required to provide additional detail that can be updated in line with wider government guidance, best practice and the latest energy technologies.

#### Statutory consultees and other organisations:

##### Environment Agency

- Support the inclusion of a climate emergency policy, but in addition to the measures indicated, it should refer to the importance of partnership working when resolving the challenges of climate change.
- The wording of the policy should refer to avoiding impacts in the first instance, with mitigating and adapting to impacts used to make appropriate development more resilient to climate change rather than being used as justification to allow inappropriate development that will ultimately prove to be unsustainable.
- Recommend that a catchment-scale Natural Capital Assessment is undertaken in order to better understand the whole costs of protecting agricultural and horticultural uses of remaining peatlands from flooding.

##### United Utilities

- United Utilities would wish to highlight its support for any climate change policy. Sustainable surface water management and the efficient use of water should be critical elements of any such policy.
- United Utilities would also encourage the policy on climate change to be intrinsically linked to wider policies in the local plan including those relating to the detailed design of new developments and the provision of green and blue infrastructure.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Natural England

- Natural England welcome the inclusion of this policy and affirm that the climate and biodiversity emergency should be central to the new Local Plan.
- Policy ST03 could be strengthened by the inclusion of references to Nature-based Solutions (NbS) and the NRN / LNRS. Please see our comments above on NRN / LNRS.
- Natural England note that NbS can contribute to reducing net GHG emissions as part of the government's wider strategy for achieving Net Zero GHG emissions by 2050, which is a statutory requirement for the UK and England. This will require major changes in the way we manage the natural environment, alongside changes in energy, transport and other sectors.
- NbS describe actions that address societal challenges, such as climate change, in ways that benefit both people and biodiversity. Not all environmental management for Net Zero is true NbS and not all NbS deliver climate change mitigation. As per our comments above, woodland creation and peatland restoration offer the largest potential contributions to Net Zero.

#### Lancashire County Council

- The policy would help support ambitions to achieve net zero by embedding climate and environmental sustainability considerations at the heart of all development proposals. This could include setting out support for specific measures which could include low carbon and renewable energy generation, reducing vehicle emissions, encouraging a shift away from private car to active and sustainable travel, improving energy and water efficiencies in new buildings, maximising opportunities to improve green infrastructure, wildlife habitats, biodiversity net gain and minimising flood risk.
- This policy direction is generally supported but should also be informed by both the Lancashire wide Environment Commission and Independent Economic Review evidence base and with Lancashire County Councils Environment and Climate Change Teams Strategic objectives. It should be noted that there are new economic sectoral opportunities for growth in this area and so it cross cuts across both environment and economic themes.

## ST04 – SETTLEMENT BOUNDARIES, PROTECTED LAND AND GREEN BELT

A total of 64 respondents made comments in relation to ST04 - Settlement Boundaries, Protected Land and Green Belt.

### **Questions**

#### **9. What policy approach do you think we should follow within settlements (e.g. allow more, restrict more)? Please explain why.**

43 respondents answered this question.

#### Residents and members of the public:

- Protect greenfield land within settlement boundaries more strongly.
- Need to allow release of Green Belts to provide for future and ongoing needs as well as encouraging development within settlements.
- Protect greenfield land. All green spaces should be safeguarded. As the council has declared a climate emergency, to remove greenfield protection would be hypocritical.
- Limit the amount of Greenfield & Green Belt land that is to be targeted for development. Better to allow development within settlement boundaries.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- It is not logical to have more restrictions on Protected Land than Green Belt.
- Carry on with current proposals provided that it includes a prioritisation of maintaining the use of agricultural land.
- Support the approach of using brown field sites and to protect greenfield land within settlement boundaries more strongly.
- Protect green belt.
- Should not build house on farming land.
- Policy should encourage brownfield land development first and keep developments as small as possible in greenbelt areas.
- Protect greenfield land within settlement boundaries more strongly.
- Protect existing Greenbelt and do not allow any development and further protect greenbelt in Douglas Valley due to its high amenity valley.
- Protect green field land. Agricultural land is premium land and is needed for arable farming etc.
- No housing developments on Green Belt. Greenfield sites or currently protected safeguarded Plan B sites should be allowed or considered before all brownfield sites are used and even then 'exceptional circumstances' would have to be proved by any would be developers.
- Protect greenfield land strongly.
- Build on brown field first.
- Whilst the definition of settlement boundary is not quantified and therefore is potentially misleading we feel that development should take place within brownfield sites in areas that are already developed and should not be allowed to link one settlement to another.
- Greenfield sites should not be considered whilst brownfield ones remain undeveloped.
- Only named settlements should be considered for expansion and should not encroach on Grade 1 Agricultural Land.

### Borough, Parish, Town Councillors / Community Groups:

- The Green Belt should not be released here in Parbold and the type of housing needed should be affordable for senior citizens. Flooding is a serious problem in Parbold and LLFA need to act now. Farmers can help by reinstating the ditches, planting hedges this will help with flooding, biodiversity and our wildlife.
- Keep the green belt as it can't be reclaimed.
- It is inevitable that pressures from housing and employment development needs will mean there is a necessity to release land from the Green Belt to accommodate growth where it can be justified.
- The Local Plan is one of the limited means through which Green Belt boundaries can be changed, this policy is critical in balancing the evidence-based need for growth whilst minimising the surrender of precious Green Belt status. It is also an option to consider that should Green Belt release be deemed essential then every effort should be made through the Duty To Cooperate obligation to seek support in satisfying growth demands from our neighbouring authorities.
- Settlement Boundaries should be well defined and should not be extended to embrace greenfield land that would otherwise be in Green Belt.
- It is not clear as to why Alternative Approach 2 would make it difficult to enforce a policy that gives priority to brownfield land development. The careful construction of this policy approach could still require a sequential test to be applied to ensure brownfield opportunities are fully explored before greenfield sites are exploited.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Some more pensioner bungalows in appropriate locations e.g. near Stockley Crescent are needed according to a survey carried out by BPC. Infill within existing settlements could be beneficial.

#### Organisations, including developers, landowners and representatives:

Abbott-associates on behalf of Southport Land and Property Group

- Allow more development.

Sat-plan on behalf of Gleeson Homes

- A balanced approach is needed allowing for some Green Belt release which is complemented by development on brownfield sites which is truly deliverable and developable without putting added pressure on communities and infrastructure within the identified settlements.

NJL Consulting on behalf of owner/developer

- There should be much more flexibility on allowing development within settlements.

Gladman

- Gladman support the direction the Council is taking to allow for flexibility for housing development coming forward in Protected Land designation. However, it is considered unnecessary to continue the approach of using settlement boundaries given that the majority of the land outside urban areas is already afforded protection due to its current designation of being located in the Green Belt.

Abbott-associates on behalf of Southport Land and Property Group

- The new Local Plan should remove the Protected Land designation and current Protected Land should be included as greenfield land within settlement boundaries.
- The development of greenfield land within settlements should not be stifled by imposing the development of brownfield land in the first instance by policy requirements.
- The LPA is requested to give full consideration to: Assessing and identifying housing and other development needs arising within rural settlements/villages and across the rural areas – for both affordable and market housing; Recognition that such needs are unlikely to be met fully from sites excluded from the Green Belt.

Emery Planning on behalf of Redrow Homes and Wainhomes North West

- The preferred approach is: set out what will be allowed within and outside of settlement boundaries.
- The consultation does not specifically address the issue of Green Belt release. However, it is critical to consider this when looking at the approach to settlement boundaries and the Green Belt.
- The Council previously considered that exceptional circumstances exist to justify the release of Green Belt existed at the time of the Local Plan Review: Preferred Options in 2018. This included the release of the two sites that are subject of these representations. Going forward, at a strategic level, due to the highly restrictive nature of the Green Belt in West Lancashire, releases from the Green Belt would fulfil the exceptional circumstances test in terms of contributing to meeting the development needs of the borough, and meeting identified market and affordable housing needs.

Cockwill on behalf of Melford Construction Ltd



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- More development should be allowed within and adjacent to settlements where it can be proved to be sustainable.

#### Lichfields on behalf of Taylor Wimpey Limited

- Taylor Wimpey supports the positive stance the Council takes on development of brownfield and greenfield land within settlement boundaries. However, in order to provide the appropriate amount of land to meet the identified housing need, Taylor Wimpey considers it will also be necessary to release Green Belt land.
- Taylor Wimpey's sites are suitable for Green Belt release and would create a sustainable extension to Appley Bridge.

#### J10 Planning on behalf of W Ainscough Esq

- Allow settlements to grow.

#### PWA Planning on behalf of Applethwaite Homes

- Whilst Protected Land does not need to be done away with as a designation all together, the policy should be adapted to allow for appropriate development in sustainable locations close to existing settlements.
- A flexible approach should instead be taken whereby appropriate housing is allowed for close to settlements, such as specialist accommodation for older people, which should be viewed as a clear material consideration to be given significant weight in the decision-making process.

#### Turley on behalf of David Wilson Homes

- DWH considers that the details of this policy should not therefore be formulated until the appropriate evidence base (HEDNA, SHLAA, Green Belt Assessment, etc.) have been completed.
- DWH would object to one of the "alternative approaches" of protecting greenfield land within settlement boundaries more strongly and the requirement of a sequential test that would require an assessment and discounting of all brownfield sites within a settlement before development would be allowed on greenfield sites. Such an approach is likely to significantly constrain development in certain locations and would preclude the creation of sustainable patterns of development.
- DWH considers that development on greenfield sites within settlement boundaries should be assessed against policies in the New Local Plan that seek to create sustainable patterns of development, rather than there being a blanket restriction on their development.

#### PWA Planning on behalf of Jeff Hill

- More development should be allowed for on current Green Belt land in sustainable locations close to existing settlements as existing settlement boundaries provide only limited housing land for future need. Given the future housing requirements necessary to meet the needs of West Lancashire, in particular Skelmersdale, it is clear that a review of Green Belt boundaries will be necessary, as the supply of non-Green Belt land (urban land / safeguarded land / open countryside) is limited and will only meet a portion of the identified needs.
- it is vital for the Council to reconsider existing Green Belt designations in the most sustainable locations.
- Promote site located within close proximity to the settlement of Skelmersdale to the north of Beacon Lane on land associated with Whaley Farm, an appropriate site for Green Belt release given its highly sustainable location bordering the settlement of Skelmersdale.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

Pegasus Group on behalf of Bloor Homes

- Support the need to set out clear settlement boundaries and what will be allowed within settlement boundaries and allowing for Green Belt boundary changes where necessary in order to accommodate needed development. This must be informed by a robust and up to date assessment of development needs, and therefore we reserve the right to comment further on this as the plan progresses and such needs are known.

WSP on behalf of Seddon Homes Ltd.

- Seddon's preferred approach is that sustainable residential development should be allowed within and on the edge of settlement boundaries which are defined as Key Service Centres (assuming Tarleton is to become a Key Service Centre in the Local Plan).
- It is essential that the Council reassesses the purpose of the Protected Land designation. Land east of Carr Lane, Tarleton, should have their Protected Land designation removed and be included with the Tarleton settlement boundary.

#### Statutory consultees and other organisations:

Environment Agency

- Provided that important community open spaces and green spaces are protected, development in settlements should be permitted (where it accords with other relevant local plan policies) to avoid putting development pressure sites outside settlement boundaries.

### **10. What balance do you think there needs to be between building on 'brownfield' and 'greenfield' land? How could we make a 'brownfield first' policy work in reality?**

45 respondents answered this question.

#### Residents and members of the public:

- Brownfield first.
- A mix of greenfield and brownfield sites.
- There are always brownfield sites that can be used for housing.
- Development on existing brown field land should be a priority.
- Sequential approach, eliminate all potential brownfield sites first before allowing greenfield development.
- Brownfield should be used in priority to greenfield.
- Make it much more difficult to get permission to build on greenfield land with incentives to ensure brownfield sites are safe to build on.
- There is sufficient brown field land.
- All applications from brownfield sites should be given priority.
- All unused brownfield sites should be used first.
- Only allow development on brownfield sites.
- Brownfield is priority and greenfield should be banned.
- This should be a policy restrict developments other than on brownfield sites.
- Brownfield sites first policy be adopted. Greenfield sites should not be considered whilst Brownfield sites remain undeveloped.
- Greenfield sites should be protected for community recreation, including land designated for rewilding.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Borough, Parish, Town Councillors / Community Groups:

- Brownfield sites that have no pollution issues should be built on.
- Brownfield first.
- The brownfield register should be proactively maintained and promoted, actively pursuing private owners to regenerate sites that are demonstrating a sub-optimal return either economically or aesthetically.
- Can the Council explore how vacant or unused brownfield sites can incur additional rates as is done with the increased Council Tax rates that are imposed on properties that have remained empty for extended periods?
- Brownfield land should always be utilised fully first; with infill within existing settlements to be prioritised next.

#### Organisations, including developers, landowners and representatives:

##### Sat-plan on behalf of Gleeson Homes

- A balanced approach is needed allowing for some Green Belt release which is complemented by development on brownfield sites which is truly deliverable and developable without putting added pressure on communities and infrastructure within the identified settlements.

##### NJL Consulting on behalf of owner/developer

- Any policy needs to align with the NPPF in the first instance, but being mindful that certain sites may end up being designated for development whether they are greenfield or brownfield to meet housing targets. Any wider policy should support development within the settlement boundary whether it be brown/green in nature to avoid the need to widen settlements into green belt land.

##### Sat-plan on behalf of Stewart Milne Homes

- A balanced approach is needed allowing for some Green Belt release which is complemented by development on brownfield sites which is truly deliverable and developable without putting added pressure on communities and infrastructure within the identified settlements.

##### Gladman

- The Council should not be seeking to prioritise the delivery of brownfield sites as this approach is not consistent with the requirements of national policy which seeks to encourage the effective use of previously developed land.
- In order to meet development needs, it is anticipated that the Council will need to undertake a Green Belt Review in order to identify land for development where such sites do not meet the five purposes of Green Belt and such sites are released from the Green Belt in order to meet identified housing needs.

##### Abbott-associates on behalf of Southport Land and Property Group

- The development of greenfield land within settlements should not be stifled by imposing the development of brownfield land in the first instance by policy requirements.

##### Cockwill on behalf of Melford Construction Ltd

- Not all brownfield sites are suitable for housing and not necessarily viable even if there are in the right location. The LPA's approach to employment sites protection can also be counter productive as redeveloping an employment site for housing

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

could provide a more compatible use in the locality. Consideration of greenfield land for development should be given on the merits of each unique site.

#### J10 Planning on behalf of W Ainscough Esq

- Brownfield land needs to be properly assessed to understand whether it is deliverable or not.

#### Smith and Love on behalf of Mr D. Little

- It is therefore plain that both a higher brownfield balance or target cannot be reasonably imposed and a 'brownfield first' policy cannot be justified and would soon become unworkable. This underlines the need for a Green Belt Review.

#### PWA Planning on behalf of Applethwaite Homes

- Whilst development of brownfield land should be encouraged, there are numerous sites within the Borough which are classified as 'greenfield' which have limited value to the rural character of the area and lie close to existing areas of built form in highly sustainable locations. This includes land to the east of Boundary Lane in Hesketh Bank and its development would represent a great improvement to the area despite it currently being classified as a greenfield site and Protected Land.

#### Acland Bracewell on behalf of the Lilford Estate

- The Lilford Estate acknowledges the merit in a brownfield first approach. However, an overly proscriptive emphasis on developing brownfield land can have the negative result.
- Where it can be demonstrated that a site and development is sustainable, it should not be prevented from coming forward irrespective of whether it is brownfield or greenfield land.

#### PWA Planning on behalf of Jeff Hill

- Whilst development of brownfield land should be encouraged, there are limited deliverable brownfield sites to meet future housing needs of the Borough. Therefore, appropriately located greenfield sites in sustainable locations should be put forward for development.
- Promote site located close to the settlement of Skelmersdale to the north of Beacon Lane on land associated with Whaley Farm which represents an appropriate greenfield site for Green Belt release.

#### Acland Bracewell and CBRE Ltd on behalf of Tarleton Estates Ltd and Lilford 2005 Ltd (The Lilford Estate)

- The Lilford Estate acknowledges the merit in a brownfield first approach. However, an overly proscriptive emphasis on developing brownfield land can have the negative result of inhibiting development to the detriment of local communities.
- Where it can be demonstrated that a site and development is sustainable, it should not be prevented from coming forward irrespective of whether it is brownfield or greenfield land.

#### WSP on behalf of Seddon Homes Ltd.

- The provisions of the NPPF is to ensure sustainable sites, regardless of whether they are brownfield or greenfield, are brought forward to meet development needs. Focusing too heavily on brownfield sites is likely to result in delays to the delivery of housing.
- It is important to note that greenfield sites can also make an important and positive contribution towards the supply of sites for future development and land east of Carr

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

Lane, Tarleton can come forward in the short to medium term to ensure a sustainable delivery to homes for the area.

#### Statutory consultees and other organisations:

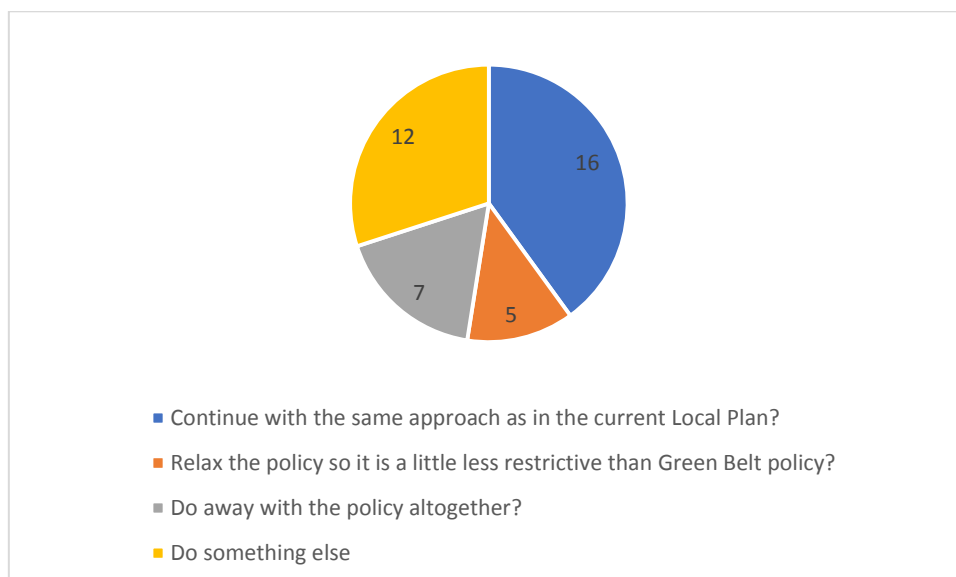
##### Environment Agency

- Consider encouraging brownfield first by reducing developer contributions to offset any viability issues? Any discount on contributions would not apply to greenfield sites. Also, ensure the plan clearly established what land can be classed as brownfield to avoid the loss of community open spaces, green spaces and gardens that provide recreational space for residents and the wider community.

#### **11. For Protected Land, do you think we should**

- **Continue with the same approach as in the current Local Plan?**
- **Relax the policy so it is a little less restrictive than Green Belt policy?**
- **Do away with the policy altogether?**
- **Do something else (please state what)**

40 respondents answered this question. 16 or 40% supported 'Continue with the same approach'.



#### Residents and members of the public:

- Strengthen protection for all greenfield land.
- Protect our greenfield indefinitely.
- Extend the current safeguarding and Plan B Policies.
- Convert all Protected land to greenbelt and use then use it to produce food, prevent urban sprawl, protect nature and wildlife, promote wellbeing.
- Do a proper survey and discuss.

#### Borough, Parish, Town Councillors / Community Groups:

- Alternative approach 2 seems to offer the best option for consideration of Protected Land.
- At the eastern entrance to West Lancs, it is important to protect the green field land for visual amenity and to prevent the loss of the greenbelt around J3 of the M58 as it

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

is not only important to the visual amenity and aesthetics of Bickerstaffe, but also as the entrance to west Lancs from the east.

#### Organisations, including developers, landowners and representatives:

Acland Bracewell and CBRE Ltd on behalf of Tarleton Estates Ltd and Lilford 2005 Ltd (The Lilford Estate)

- All sites currently designated as Protected Land within the existing Local Plan and proposed to continue to be subject to this designation through the Local Plan Review should be properly appraised.
- In light of the above, it is essential that the Council undertakes a comprehensive Green Belt Review assessing sites across the Borough including Tarleton. The previous Green Belt Study was carried out in 2011 and is therefore now considerably out-of-date.
- Urban Capacity Study should be undertaken which provides a detailed assessment of potential brownfield capacity and the ability of previously developed sites to realistically meet development needs across the Borough.
- Following a robust review of Protected Land, Green Belt and Urban Capacity, the Lilford Estates considers that the release of sites for new development around Tarleton can be undertaken in a sustainable way, over the next 30 years. This could include the identification of Safeguarded land, if appropriate.

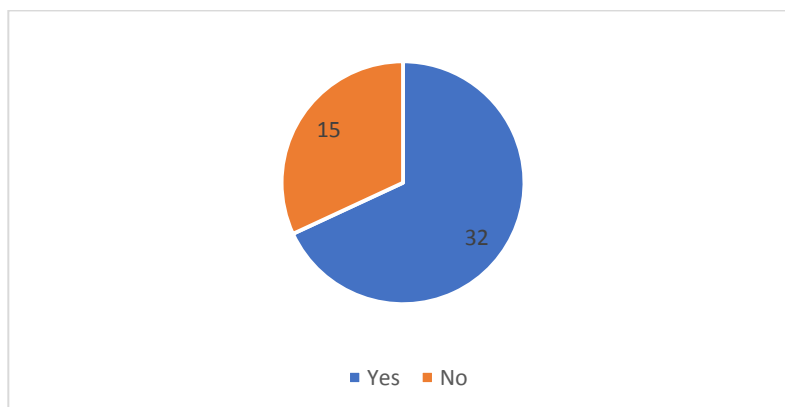
#### Statutory consultees and other organisations:

Sport England

- It is important that the policy allows for any necessary ancillary sport facilities to be developed to future proof and support existing and proposed playing fields in these areas.

#### **12. Should we have an additional policy to give greater protection to our best and most versatile agricultural land? If 'yes', how should we do this (e.g. a sequential approach, where we use Grade 3 and below land first, then Grade 2 land, then Grade 1)?**

47 respondents answered this question.



#### Residents and members of the public:

- Grading land would give an excuse to build on the 'lower grade' land. It all needs equal protection.
- All agricultural land should be protected no matter what grade it is.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Sequential approach.
- The suggested approach seems sensible. Protecting agricultural land should be a priority as once it has been lost it is practically impossible to regain.
- Itemise brownfield sites as the main source. Green belt shouldn't be under discussion
- If it's poor land and not farmed then if needed it could then be considered
- Adopt a definition of Agriculture that prevents factory farming that does not make use of any of the natural attributes of the site.
- grade 1 should be a last resort. Grade 2 and 3 should only be used when no suitable brownfield sites exist or sites which are technically in green belt but are already developed for storage etc.
- Brownfield sites should be used first.
- All agricultural land should be protected.
- It should not be considered at all.
- New up to date land grade surveys and classifications would be required.
- The best, most productive and versatile land should be treated as a strategic resource in the same way.
- Greater protection should be given to versatile agricultural land.
- Protect all greenbelt land.
- Grade 1 land should be preserved and maintained.
- Do a proper survey and shade the maps produce.

#### Borough, Parish, Town Councillors / Community Groups:

- A sequential approach, need to be more self sufficient in food growth vegetable and animal and less dependant on other countries.
- Build on other land always as a first.
- Grade 1 BMV in West Lancashire is of National significance, accounting for the second largest area of grade 1 in the Country. It should therefore be considered essential that this should be recognised in this policy and thereby help to elevate the importance and significance to the Borough both socially and economically. Determination of land grade must be undertaken by an independent, possibly Government department, working directly for the Planning Authority, with the cost for this being borne by the developer/applicant.
- A sequential approach, where all brownfield land should be used first should be adopted. Then any housing development should infill within existing settlement boundaries. The greenbelt should not be used.

#### Organisations, including developers, landowners and representatives:

##### Gladman

- Gladman believe that there will clearly be some instances when significant benefits could be delivered through the development of sites on BMV land, which would outweigh the loss of a relatively small proportion of BMV within the borough.
- Accordingly, the Council should not be seeking to provide greater protection to BMV land particularly when such land will already be afforded protection by other policy measures i.e. Green Belt.

##### J10 Planning on behalf of W Ainscough Esq

- Support sequential approach.

##### Acland Bracewell on behalf of the Lilford Estate

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- It is considered that this matter should continue to be addressed through planning applications with suitable assessments provided to allow the decision makers to reach a balanced view. It is not considered necessary that an additional Local Plan policy be introduced.
- Moreover, development for agriculture, for example agricultural buildings or glasshouses, which are highly likely to be sited on best and most versatile land, and which is appropriate development in the Green Belt could be prejudiced/refused if an additional policy is applied. This goes against the thrust of the NPPF and the governments support for agriculture as an industry.
- Critically, WLBC should not be allocating sites for residential or employment development on land which is best and most versatile agricultural land, and this land should be protected.

Acland Bracewell and CBRE Ltd on behalf of Tarleton Estates Ltd and Lilford 2005 Ltd (The Lilford Estate)

- Assessing the impacts of development on best and most versatile agricultural land is already an established part of the development management process. It is considered that this matter should continue to be addressed through planning applications with suitable assessments provided to allow the decision makers to reach a balanced view.
- Critically, WLBC should not be allocating sites for residential or employment development on land which is best and most versatile agricultural land, and this land should be protected.

WSP on behalf of Seddon Homes Ltd.

- Seddon would not support a policy that gave greater protection to best and most versatile agricultural land. Seddon accept that the Borough contains prime agricultural land. Nevertheless, there are also parcels of land which may be classes as Grade 2 and Grade 3 and whilst may be suitable for some agricultural use, would make sustainable residential development sites.
- Seddon objects to the notion that a sequential approach to sites within settlements are appropriate as it would not comply with NPPF policies surrounding sequential tests.

### 13. Do you have any other comments on this topic?

31 respondents answered this question.

#### Residents and members of the public:

- Protect green spaces.
- Only allow development in the large settlements to prevent the rural aspect of West Lancs. being eroded. Very small infill sites in other settlements to be reserved for social housing.
- High Grade BMV agricultural land must be protected.

#### Borough, Parish, Town Councillors / Community Groups:

- Protect the Green Belt and the rural economy.
- Remember once agricultural land it turned into a housing estate its food production is lost for good.
- ARG 's objective - to prevent landowners and developers effectively attempting to control future developments over the needs and views of local residents in their



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

seemingly never ending quest for vast financial rewards whilst destroying the rural nature of Aughton with a detrimental effect on the environment. ARG represent the views of many local residents and have had the backing and support of our Local MP and Aughton Parish Council and latterly that of WLBC Aughton Ward Councillors.

- The best, most versatile land should never be used for development.

#### Organisations, including developers, landowners and representatives:

NJL Consulting on behalf of owner/developer

- Land already identified for future development and released from green belt should be identified as key to housing delivery and designated for early delivery in the Plan process.

Emery Planning on behalf of Redrow Homes and Wainhomes North West

- The policy on BMV is set out in national policy.

Emery Planning submitting on behalf of Wain Estates Limited

- The consultation does not specifically address the issue of Green Belt release. However, it is critical to consider this when looking at the approach to settlement boundaries and the Green Belt.
- The Council considered that there were exceptional circumstances sufficient to justify the release of Green Belt at the time of the Local Plan Review: Preferred Options in 2018. This included a site for release at Parbold (Site HE2). At a strategic level, Green Belt release at Parbold would fulfil the exceptional circumstances test in terms of contributing to meeting the development needs of the borough, and meeting identified market and affordable housing needs in the Eastern Parishes and Parbold.

Cockwill on behalf of Melford Construction Ltd

- Protected Land on a site by site basis should be considered for immediate development, allocated as such and brought within the settlement boundaries. The site at BA.019 (SHELAA) is a good example where a housing site could be allocated, brought with the settlement boundaries as it can offer high levels of sustainability, despite the Flood Risk 3 status which is erred in its approach to its designation as the FR3 is only because the Environment Agency have excluded flood defenses that have stood for around 400 years with little or no maintenance from them (the dual banks along the outskirts of Banks).

Savills UK Ltd on behalf of Harworth Plc.

- At this stage in the plan preparation process, and in the absence of a preferred policy on housing and employment land requirements, the requirement for Green Belt release remains unknown. We broadly support the retention of a Green Belt and Settlement Boundary approach to policy, in accordance with the NPPF, however consider that for homes and employment floorspace be provided in the right location and at a sufficient quantum to meet the needs and growth aspirations of the Borough, a significant level of Green Belt release will likely be necessitated.
- Detailed comments on the brownfield first approach in relation to provision of both homes and employment space are set out later within this consultation response, however in summary there are clear examples within planning case law and recent determinations which require homes to be capable of being sold upon construction, and therefore delivered in appropriate types, sizes, and locations. The impacts of the Covid-19 pandemic have had major impacts on the housing and logistics sectors, creating significant demand for larger homes and warehousing floorspace. As such we would strongly recommend that an overly restrictive policy on a brownfield-first

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

approach would stifle the ability of the Borough to deliver development in the correct locations, and therefore reducing inward investment.

#### J10 Planning on behalf of W Ainscough Esq

- Green Belt review is necessary.

#### Smith and Love on behalf of Mr D. Little

- A proposal to introduce an additional policy giving greater protection to BMV agricultural land which goes beyond national policy cannot be justified and will be counterproductive in a borough such as West Lancashire where the resource is so extensive. A measured approach can be taken to the loss of BMV, but it must be accepted that some loss, together with some alteration of Green Belt boundaries in the most sustainable locations, is necessary.

#### Hollins Strategic Land (HSL)

- At this stage, HSL considers that it is not possible to meaningfully engage on these matters without having had sight of the Council's issues and options with regard the employment and housing land requirements. As such, HSL will reserve comments for later in the plan-making process.

#### Asteer Planning on behalf of Richborough Estates Ltd.

- Richborough considers that before decisions are made on settlement boundaries, proposed changes to the Protected Land policy approach or the need for amendment to Green Belt boundaries; the following work on the evidence base must be published by the Council: WLBC's total housing requirement and the rationale for its approach, An evidenced Spatial Strategy, An Urban Capacity Study and an assessment of the need for Green Belt release and a refresh of the Council's Green Belt Assessment.
- It is crucial to undertake and analyse the above evidence before developing any other strategic, housing or employment policies in more detail.

#### Acland Bracewell on behalf of the Lilford Estate

- Lilford Estates considers that the release of sites for new development around Tarleton can be undertaken in a sustainable way, over the next 30 years. This could include the identification of Safeguarded land, if appropriate. Critically, the Masterplan sites and proposals promoted by the Lilford Estate have the support of the Parish Council and extensive public consultation has already been undertaken. The Estate will provide further evidence to support and demonstrate that there are no constraints which would preclude their development.

#### Acland Bracewell and CBRE Ltd on behalf of Tarleton Estates Ltd and Lilford 2005 Ltd (The Lilford Estate)

- A formal Protected Land Review should be undertaken by the Council as evidence to inform the Local Plan. This process will identify which sites are most sustainable and should be removed from Protected Land and incorporated within the settlement boundary. To this end, Sites 1 and 2 are considered to be very well situated close to key services in Tarleton and would represent highly sustainable locations for new residential development.

#### Pegasus Group on behalf of Bloor Homes

- With regard to the protection of green field land within settlements, this will have to be assessed in terms of their function, use, quality and quantity of such spaces within an area to determine if they represent Local Green Spaces or other forms of open space that warrant protection.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Agree that those greenfield areas within settlements that do provide a clear community, health and wellbeing and/or amenity benefit should be strongly protected.

WSP on behalf of Seddon Homes Ltd.

- Tarleton is a sustainable settlement that can accommodate more development. The west of Tarleton is constrained by Green Belt and as such this significantly limits the potential development sites which can come forward.
- Seddon strongly object to the creation of new Green Belt in the borough. Seddon has not seen evidence to demonstrate the Council has 'examined fully all other reasonable options for meeting its identified need for development' before deciding to amend the Green Belt boundaries.

Lichfields On behalf of Crompton Property Developments Ltd

- Currently, there is a positive stance towards the development of brownfield and greenfield land within settlement boundaries, and CPDL supports continuing with this approach.
- CPDL is of the view that the YTF Strategic Site, as defined by Policy SP3 of the WLLP should be integrated into the wider settlement boundary of Burscough within the new Local Plan.
- CPDL is of the view that Areas B, C, D, E and F should be allocated for residential development, whilst Area A should be allocated for employment development.
- CPDL is of the view that Areas G, H, I and K should be released from the Green Belt and allocated for employment development within the new Local Plan.
- The development of this land would deliver all three elements of sustainable development as set out within the Framework and would ensure that Burscough continues to prosper over the proposed plan period and beyond.

Pegasus Group on behalf of Rowland Homes

- Rowland agree that the emerging plan should set clear settlement boundaries and guidance on what will be allowed within settlement boundaries, protected land and Green Belt to provide certainty for landowners and developers.
- That said, this must be informed by a robust and up to date assessment of development needs, alongside a thorough site selection process (including Green Belt review).

Pegasus Group on behalf of Story Homes

- Story agree that the emerging plan should set clear settlement boundaries and guidance on what will be allowed within settlement boundaries, protected land and Green Belt to provide certainty for landowners and developers.
- That said, this must be informed by a robust and up to date assessment of development needs, alongside a thorough site selection process (including a Green Belt review), and therefore we reserve the right to comment further on this as the plan progresses and such needs are known.
- Irrespective of the of the designation of the land (land within the settlement boundary/Green Belt/Protected Land as discussed in the emerging plan), there should be an emphasis on sustainable development and locating development in locations which are or can be made sustainable, as per the overarching requirements of the NPPF and PPG.

### Statutory consultees and other organisations:

Environment Agency

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Recommend against a policy to protect BMV as it could potentially conflict with land use change proposals that may emerge in relation to the provision of Biodiversity Net Gain or habitat restoration schemes, actions relevant the England Peat Action Plan, etc. Such a policy could potentially be in direct conflict with Policy ST03.

#### United Utilities

- United Utilities requests the council's support for future investment in infrastructure in order to be able to expediently respond to the needs of the borough. The following policy wording is recommended:  
"The council will support the principle of investment in infrastructure to respond to the needs of the borough. Infrastructure is key to the delivery of sustainable development and economic growth and meeting development needs. The council will be supportive of infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives by water and sewerage providers."
- Recommend a policy based on the following wording.  
"Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs."
- These policies would enable United Utilities can continue to meet the growth and development aspirations of the borough, by ensuring that the fundamental infrastructure requirements of these future developments can be achieved.

#### Sport England

- It should be acknowledged that some green open spaces define the character and appearance of a place, which in turn encourages people to use them for formal and informal sport and recreation. These spaces should be acknowledged for their health and social wellbeing benefits. Therefore, the loss of such spaces within established settlements that may already suffer from social deprivation should be considered by the Council in relation to the proposed Local Plan objectives and NPPF (2021).

## 8. Housing and Communities Policies

### HC01a – WHERE HOUSING CAN GO

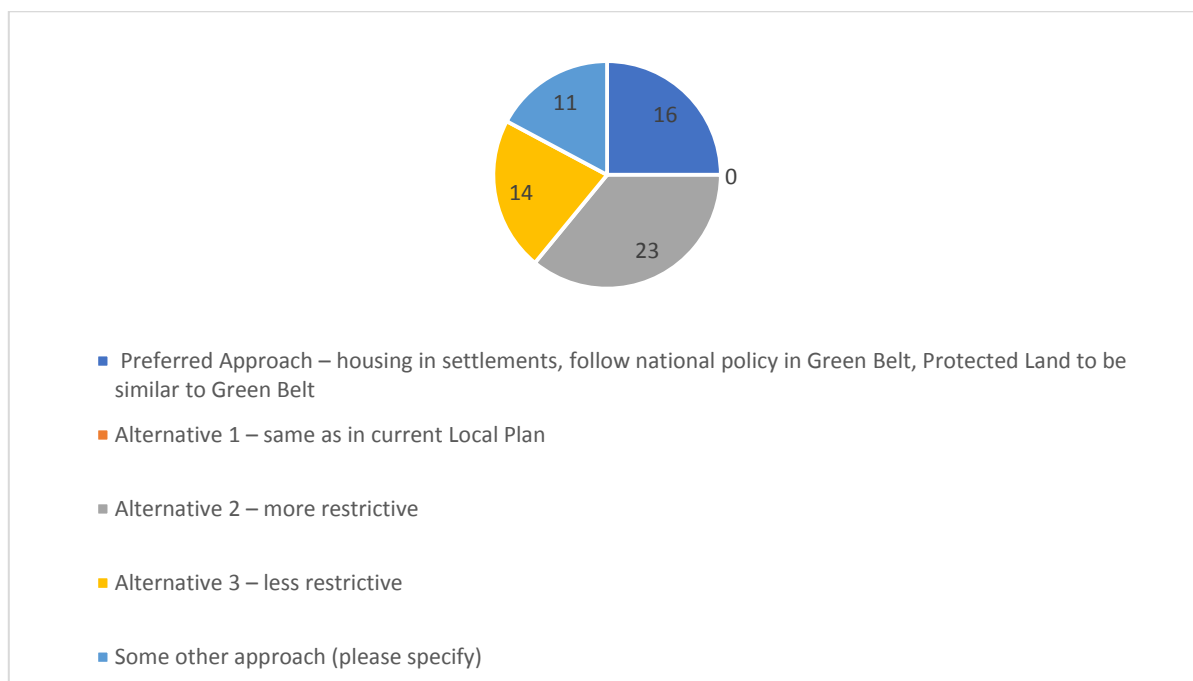
A total of 72 respondents made comments in relation to HC01a - Where Housing Can Go.

#### Questions:

#### 1. What do you think is the best approach towards where housing can go, and why?

- Preferred Approach – housing in settlements, follow national policy in Green Belt, Protected Land to be similar to Green Belt
- Alternative 1 – same as in current Local Plan
- Alternative 2 – more restrictive
- Alternative 3 – less restrictive
- Some other approach (please specify)

A total of 64 respondents answered this question. The most commonly selected approach was 'Alternative 2' (23 or 36%) followed by 'Preferred Approach' and 'Alternative 3' (16 or 25%).



#### Residents and members of the public:

- A policy taking account of brownfield sites in greenbelt which should be prioritized for development
- Increased restrictions on safeguarded sites and Green Belt.
- Use sites that are in the green belt that are technically within the green belt but that are in reality brown field where there are existing buildings and usage for things such as storage.
- No building of houses or anything else on green belt or farmland. We are one of 2 areas in the UK with grade 1 agricultural land and this should be protected at all costs.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Some flexibility thinking is needed

#### Borough, Parish, Town Councillors / Community Groups:

- The HBF considers that taking a positive approach that supports residential development in sustainable locations is appropriate.

#### Organisations, including developers, landowners and representatives:

##### Gladman

- Gladman support the Council's decision to direct more growth towards the larger towns.
- However, we do believe a hybrid approach is required and the consideration of Green Belt release should also be included.
- Given that Ormskirk is surrounded by Green Belt and is one of the most sustainable settlements in the borough, it is important that land is released from the Green Belt to maintain sustainable growth patterns to meet identified housing needs.

##### J10 Planning on behalf of Taylor Wimpey Limited

- In summary, whilst the focus of new development in the new Local Plan may be the key service centres, the Council must ensure that the sustainable growth of other settlements in the Borough is adequately supported by distributing an appropriate level of development to the more rural areas and settlements including the Eastern Parishes and Appley Bridge in particular.

##### WSP on behalf of Seddon Homes Ltd

- Seddon recommends an alternative option where minimum housing targets are set for each settlement. This would be consistent with the NPPF. The settlement of Tarleton is a key service settlement which should have a minimum housing target in order to accommodate more development in order to ensure that sites which are sustainable can come forward to deliver much needed housing in the local area for the future period of the Local Plan. The Local Plan will need to allocate sites to meet this target (with an allowance for windfall too). This will mean that housing targets are clear for each settlement area and that the Local Plan vision and objectives can be met.

## **2. What are your views on housing in the Green Belt (for example 'rural exception sites')?**

50 respondents answered this question.

#### Residents and members of the public:

- Building housing on green belt will further impact the environment and it should not be allowed.
- All efforts to clean up brownfield sites should be explored first regardless of cost.
- No new houses should be permitted in green belt or agricultural land.
- Absolutely not, green belt land should be protected from any kind of development for environmental reasons.
- The Green Belt is so important to our well being and for protecting the cohesive nature of our settlements.
- Don't build on green belt, high density approaches to housing

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Prioritise building on brownfield sites. More housing to settlements that have not delivered their fair share in recent years.
- More clarity on the definition of affordable is needed. Houses are not really affordable for locals.
- Support the more restrictive option, new housing developments should be focussed on Skelmersdale.
- This needs to be tightly regulated to prevent abuse of an exceptions and to protect the green belt
- Some brownfield sites in the GB should be considered for residential development, and there could be some infilling allowed in the hamlets.
- There should be no incursion into the green belt for any housing developments
- It would be a useful exercise to review and update the Green Belt boundaries around the village of Banks to identify areas that could be removed from the Green Belt without impacting the openness of the countryside.
- It is unacceptable to build on green belt. The green belt land we have in West Lancashire is exceptional and it would be unnecessary to build on this best and most versatile land.
- It would be a travesty if any more greenbelt land is given up to housing, especially considering the need to protect wildlife and the environment (green policies).
- Support Rural Exception Sites.
- Build on brownfield sites in the GB. Suggest deletion of wording from the proposed plan.
- Disagree with housing development proposed in Aughton. Land is arable and should be used for food production, environmental, traffic, and lack of services are further reasons to not build more houses in Aughton.
- Review GB boundaries to accommodate housing for local people and affordable housing.
- Do not build on agricultural land or GB as this is why people moved to rural areas.
- Green belt should be preserved at all cost as maintaining our natural environment is crucial
- Allow small-scale housing to meet local needs.
- Protect Green Belt, build on brownfield sites first.
- Greenbelt should remain as greenbelt and should not be developed at all for housing.
- Do not release Green Belt for housing, use it for food production and wildlife.
- Prioritise building on brownfield sites in the Green Belt. Objects to Garden Villages, warehousing development, and building on Grade 1 agricultural land.
- Objects to using Green Belt to build houses on, should be used for food production. Don't meet the housing needs of other LPAs.
- Any development in rural areas which impinges on agricultural land capable of crop production must be avoided in accordance with Objective 10.
- Do not build on the Green Belt, especially Grade 1 agricultural land.
- Green belt and green site areas should not be built on, for social industrial or housing
- Allow infill development.

#### Borough, Parish, Town Councillors / Community Groups:

- Support Rural Exception Sites if they are developed and chosen by working closely with the community.
- Simonswood is unsuitable for any housing development because there is no infrastructure in place to accommodate this, i.e. no mains gas, no sewerage facilities, no bus routes, no train routes, no shops or leisure facilities.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Support delivery of new housing in sustainable locations, with total need distributed in accordance with a settlement hierarchy. Affordable housing should be affordable to local people.
- Do not release Green Belt for housing, use it for food production as it is more sustainable.
- Housing should not be built on agricultural land and must maintain this land for sustainable food protection, climate crisis management and for wildlife. There are enough alternatives areas across the Borough to meet affordable housing need.
- The rural nature of most of the West Lancashire should be respected, and the land should be protected.
- Land within property boundaries within the greenbelt should be given permitted development status.

#### Organisations, including developers, landowners and representatives:

##### Oaktree Developments

- Green Belt boundaries need to be reviewed now to accommodate the urgent need for more housing

##### Abbott Associates on behalf of Southport Land and Property Group

- West Lancashire has the most extensive Green Belt in England and it is a recognised constraint on meeting future development needs.
- Green Belt sites that are well related to existing settlements will form logical extensions to existing villages such as Banks.
- National planning policy sets out the approach to be followed in the review of the Green Belt and it is considered that, given the need for new residential accommodation and the shortage of sustainable sites for its location, Green Belt release will be necessary.

##### Emery Planning on behalf of Wain Estates Limited

- regardless of whether Green Belt release is necessary to meet the overall housing requirement, we consider that Green Belt release is very much needed in the Eastern Parishes, and specifically Parbold, to meet local needs.

##### Cockwill on behalf of Melford Construction Ltd

- Supports residential development in the Green Belt, redevelopment of brownfield sites in the Green Belt should be encouraged. Areas at risk of flooding should be allowed to be developed if that individual site does not flood or cause flooding.

##### Lichfields on behalf of Taylor Wimpey Limited

- The preferred policy approach is to allow housing within settlements outside the Green Belt with more development assigned to larger towns and less in smaller villages. There should be more development in the Eastern Parishes and Appley Bridge. Taylor Wimpey and three other site promoters have commissioned their own housing needs assessment for the Borough which shows a need for 319 - 400 dwellings per annum, more than the LHN.

##### J10 Planning on behalf of W Ainscough Esq

- Housing in the Green Belt for RES needs to be of a higher volume of houses to be attractive to registered social landlords.

##### Smith and Love on behalf of Mr D Little



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Allocate housing in sustainable villages or extend settlement boundaries. Have a flexible policy to allow for rural exception sites in the Green Belt.

#### PWA Planning on behalf of Jeff Hill

- Review Green Belt boundaries as the supply of land in settlement boundaries is limited. Particularly in Skelmersdale. The Green Belt Study is dated.
- The site in question here is located within close proximity of Skelmersdale, to the north of Beacon Lane on land associated with Whalley Farm. The site represents an appropriate site for Green Belt release given its highly sustainable location bordering the settlement of Skelmersdale. This site is also subject to a detailed SHELAA submission which should be considered alongside this response.

#### Pegasus Group

- The Council's preferred strategy would allow housing within settlements outside the Green Belt, subject to its accordance with other Local Plan Policies.
- More development is proposed to be directed towards larger towns and less development in the smaller villages, which is deemed sensible and in accordance with the approach taken in the adopted Local Plan.

#### WSP on behalf of Seddon Homes Ltd.

- The NPPF is clear that Local Plan policies should be consistent with national policy and as such it is Seddon's view that housing within the Green Belt should be consistent with NPPF policies.

### **3. Is there anything in our policy approaches that you particularly support (or disagree with), or do you have any other comments on this topic?**

47 respondents answered this question.

#### Residents and members of the public:

- Disagree with building on any green belt
- West Lancashire is pleasant because it is rural
- It's not about just allowing houses to be built, but the sustainability, efficiency and quality of that housing.
- Policy for housing developments should include looking at the recent history (past 5-10 years) of housing and therefore subsequent population increase that will test the infrastructure.
- Housing developments should only be approved if 1. gardens are adequate size and trees are pre-planted, plenty of green space around the developments; 2. Drainage is sufficient; local essential services, 3. Impact on increased traffic and changes to road infrastructure to ensure no build up of queues likely.
- Would be nice if new rural homes were affordable.
- Object to SHELAA site OA167 Land at Crosshall Brow.
- Would like to see the local plan supporting and encouraging smaller communities, like Banks, to continue to grow in a sustainable way.
- Need for services in settlements that are taking a lot of housing, such as Aughton.
- Any building in the greenbelt should be on existing brownfield sites which have permission / are already built on and building on agricultural land should be a last resort and must be kept very small.
- Disagree with housing development proposed in Aughton. Land is arable and should be used for food production, environmental, traffic, and lack of services are further reasons to not build more houses in Aughton.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Don't build on agricultural land.
- OA.074 NW of Parrs Lane: The indicated housing capacity of c 400 houses on this safeguarded site is wholly inappropriate for this environment due to congestion, pollution, unsustainable stain on existing infrastructure and destruction of natural habitats.
- OA.190 NW of Parrs Lane: This currently safeguarded site is also inappropriate for development as its awkward shape does not lend itself to correct site planning and would also create congestion, pollution and destruction of natural habitats.
- Do not agree with using very large open spaces of empty grade 1 agricultural land for large housing developments.
- Support the development of other sites in the area and accept that this is necessary, but not to ease a housing requirement burden from neighbouring authorities - all of whom have sufficient land to meet their needs.
- The policy should be as restrictive as possible in Green Belt/ rural areas.
- Build on brownfield sites, such as the old air field in Burscough.

### Borough, Parish, Town Councillors / Community Groups:

- Local knowledge is valuable and needs to be sought
- Support for housing being focussed on sustainable locations, with total need proportionately distributed in accordance with the proposed settlement hierarchy.
- Prioritise building on brownfield sites. Have an up to date Brownfield Land Register in place. Support "parked" sites in the SHELAA, names two Plan B sites that should be returned to the Green Belt.
- Proposes the idea of 20 minute communities but need for public transport to improve.
- New housing should take into account the latest evidence of need and contribute towards infrastructure provision.

### Organisations, including developers, landowners and representatives:

#### Satplan on behalf of Gleeson Homes

- Respect the Council's current approach.
- Plan to meet identified needs even if this means releasing GB land adjacent to settlements.

#### NJL Consulting on behalf of owner/developer

- Land released from the green belt already should not be time-restricted on its development. To address housing need, such sites should be free to come forward as soon as possible.

#### Satplan on behalf of Stewart Milne Homes

- Respect the Council's current approach.
- Plan to meet identified needs even if this means releasing GB land adjacent to settlements.

#### Abbott Associates on behalf of Southport Land and Property Group

- The new Local Plan should be less restrictive on where housing can go.
- Green Belt sites that are well related to existing settlements will form logical extensions to existing villages such as Banks.

#### Emery Planning on behalf of Redrow Homes and Wainhomes North West

- Allow housing within settlements outside the Green Belt.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Development should be distributed across West Lancashire but the greatest amount should be at Skelmersdale with Up Holland and Ormskirk with Aughton.
- The client's control two sites which would provide logical sustainable developments that would be proportionate in size to them.

#### Emery Planning on behalf of Wain Estates Limited

- A significant amount of housing should be distributed to Parbold to meet market and affordable housing needs, and to support service provision for a key settlement within the Eastern Parishes.
- Green Belt release is very much needed in the Eastern Parishes, and specifically Parbold, to meet local needs.

#### Savills UK Ltd on behalf of Harworth Plc.

- Objects to the housing strategy that is in the current Local Plan (not relevant). High employment and housing land demand in the Borough, the approach to allow housing to be delivered within the Green Belt where this is in accordance with national policy is broadly supported, however objects to the use of the word "limited".
- Given the fluctuations in the LHN figure for the LPA, a bigger housing number is needed.
- Because of the Covid 19 pandemic, deliver houses with good access to public and private open space.
- Promotes site BK.030 for employment and residential development.

#### Cockwill on behalf of Melford Construction Ltd

- Areas covered by restrictive flood zones should be preclude development if it can be shown that the individual site does not flood or cause flooding elsewhere.

#### P10 Planning on behalf of W Ainscough Esq

- Green Belt Review is required to consider logical sustainable extensions and GB release.

#### PWA Planning on behalf of Applethwaite Homes

- Build on areas of Protected Land that are in sustainable locations; provide more housing for people over the age of 55.

#### Turley on behalf of David Wilson Homes

- WLBC needs to be clear as to whether Green Belt boundaries need to change to accommodate growth in sustainable locations, rather than push housing down a settlement hierarchy to less sustainable settlements.
- Green Belt boundaries should be amended accordingly, particularly around the main settlements such as Ormskirk and Aughton.

#### Asteeer Planning on behalf of Richborough Estates Ltd.

- This policy should be led by the evidence – new housing should be directed to locations which are identified as a focus for growth, which are sustainable and accessible and which are deliverable, viable and able to meet the identified housing needs of the Borough. The approach should not be predetermined, which could lead to an unbalanced spatial strategy and a land supply that cannot meet the needs of the Plan Period.

#### Acland Bracewell on behalf of Tarleton Estates Limited and Lilford 2005 Limited (Lilford Estate)

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Supports the distribution of new housing to larger settlements including Tier Two settlements such as Tarleton, but less development should go to Tier 3 settlements.
- Review Protected Land and Green Belt boundaries.

#### Pegasus Group on behalf of Bloor Homes

- Promote Bloor Homes' Site at Burscough to address the Council's housing need within the emerging plan period.
- Supports the preferred approach.

#### WSP on behalf of Seddon Homes Ltd.

- Seddon objects to the Local Plan policy for Protected Land to be given the same weight as Green Belt Policy.
- In Tarleton, land currently designated as Protected Land abuts the settlement boundaries and offers the most sustainable location for delivery housing development.

#### Lichfields On behalf of Crompton Property Developments Ltd

- Supports the preferred approach and the delivery of additional housing in Burscough.

#### Pegasus Group on behalf of Rowland Homes and Story Homes

- Supports the preferred approach. Comments that Protected Land should not be afforded the same protection as Green Belt land.

### Statutory consultees and other organisations:

#### National Highways

- The intention of this policy is in accordance with paragraph 67 of 'Planning for the Future' and would be supported by National Highways.
- It is stated that as part of the next stage of preparing the Local Plan, housing site allocations will be proposed in line with the above approach. National Highways will review these proposed allocations when provided, it is also suggested that the allocations should be underpinned by evidence that assesses their impact on the SRN.

#### Sport England

- Have an up-to-date Playing Pitch Strategy. New developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.

#### CPRE, The Countryside Charity

- The housing policies should limit the amount of housing to what is needed as opposed to what developer's demand as their profit motive does not result in sustainable development.
- Efficient use of land – with a locally derived brownfield target to ensure a preference versus 'greenfield' development. Please refer to our comments on brownfield land in the covering letter and link to the national level brownfield research showing now brownfield is a resource that is not finite.
- 'genuinely' affordable housing – add genuinely (first homes, which are not in perpetuity affordable dwellings)
- Quality housing for older people – emphasis on quality of life to give older people real reason to downsize from family housing

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Principles of 'place-making' – ensure the rural character of West Lancashire's rural settlements is respected and ensure adequate green space and green infrastructure.

#### Lancashire County Council

- This policy will link to the first Strategic Development Policy ('Delivering Sustainable Development') but refers specifically to residential development only, rather than to any kind of development.
- This policy and those relating to economic development and employment should relate back to overall strategic development priorities.

### HC01b – USING LAND EFFICIENTLY

A total of 48 respondents made comments in relation to HC01b - Using Land Efficiently.

#### **Questions:**

#### **4. Which do you think is the best approach towards building on brownfield and greenfield sites?**

40 respondents answered this question.

#### Residents and members of the public:

- Brownfield sites should be developed and a restricted no. of homes should be allowed. In Village locations the house new builds should not exceed 2% of the of the houses already situated in the village. This would ensure that the nature and character of villages and hamlets are not overloaded.
- Allow lower density housing on brownfield sites to accommodate larger gardens and outdoor space.
- A(2) is the only logical solution to minimising the use of greenfield sites for development. The value of greenfield sites is too low, they should be priceless, once built on they can never exist again. Developers have to be encouraged to recycle all land, possibly with local and national subsidies until there is no alternative but to use a greenfield site.
- Have a more rigorous 'sequential' or even 'phased' approach towards brownfield land development,
- Agree with preferred approach.
- Support A(2)
- Densities should vary, highest adjacent to railway stations
- Brown field sights first and look to redevelop existing urban areas.
- Development on brownfield sites - this could be achieved by higher developer contributions on green field sites as these have a greater loss to the community
- Have a more rigorous approach to brown field development, to ensure that housing contractors do not cherry pick green field sites for maximum profit: a sequential or even phased approach as in Alternative Approach 2 above. Brown field sites first: and only then consider green field sites.
- Brownfield sites in the Green Belt.
- Develop brownfield before greenfield sites always
- Brownfield sites are the only sites that should be developed. Greenfield sites, green belt and farmland must be protected at all costs.

#### Borough, Parish, Town Councillors / Community Groups:

### Scope, Issues & Options Feedback Report

- Have a more rigorous 'sequential' or even 'phased' approach towards brownfield land development.
- It is not acceptable to have no preference for brownfield land over greenfield, as developers will always have a preference for building on greenfield sites that offer greater profitability.
- The concern is that a brownfield first policy, whilst preferred, is evidently difficult to enforce, and the reasons for this may well be multi-faceted and difficult for a policy to be overly prescriptive.
- A sequential test has potential to influence the preference for brownfield development, but without concise and effective control measures that will ensure the decision-making process is robust and not open to challenge or appeal, then there is little prospect that the sequential test will prove effective. However, every effort should be made to consider a more rigorous sequential test that would start to influence a change in future developer behaviour, and so Alternative Approach 2 is the preferred approach.
- Brownfield sites are generally privately owned and where developed/occupied on the basis of a need identified at the time of their construction. As the economy changes and companies evolve or outgrow their initial premises they are encouraged to relocate to newer, purpose-built facilities that may also be lower cost. This risks increased vacancy in older, less flexible sites, that are not fit for modern purposes and do not easily adapt to change of use. Owners then tend to hold back on re-development in order to minimise unnecessary cost in the hope that new tenants will eventually come forth. In order to shift this mindset and make brownfield regeneration more appealing requires innovative thinking about the ways in which a planning authority can encourage and prioritise brownfield sites. Some ideas may include:-
  - Limit/exclude CIL contributions and/or affordable housing obligations
  - Preferential access to recycling or waste disposal/landfill sites and discounted fees
  - Greenfield development consent to be conditional on the inclusion of a parallel brownfield development at a proportion of the greenfield site. i.e. 100 homes on greenfield requires 25 on brownfield to be built concurrently.
  - Assisted access to National grants for regeneration
- Do not build or allow any development on greenfield land as there are sufficient brownfield sites across the Borough.
- This should be borne in mind when talking to neighbouring authorities who in the past have been asking West Lancs to allow housing to be built in green belt to satisfy the needs in their area while sitting on brownfield sites. The problem perhaps is government approach to the role of housing developers who do the sums and decide where they can make the most profit. There is a need for local councils/communities to be able to challenge this and be enabled to take over such land to build to meet the local needs and also to build housing that is to standards that help tackle climate change.
- The HBF considers that supporting the development of sustainable sites is appropriate, this may mean that more brownfield sites are supported, but also allows for consideration to other elements of sustainability for both brown and greenfield sites. The HBF considers that the Council should ensure that the Plan is viable and deliverable, and this should include, policies and allocations and any prioritisation given to brownfield sites.
- The Brownfield Register should be regularly updated and this land should always be used first. Design should be in keeping with the existing property styles in the area.

Organisations, including developers, landowners and representatives:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Oaktree Developments

- Preferable to build on brownfield land but not always possible and insufficient to accommodate the needs of the Borough

#### Sat-plan on behalf of Gleeson Homes

- Meeting housing needs within the existing urban area (brownfield land) and developing such Sites ahead of any Green Belt Release is in line with paragraph 137 of the NPPF but this must be balanced against the realistic ability to deliver such Sites which are often constrained. There may not be enough specific, 'deliverable' or 'developable' sites within the urban area and on existing brownfield sites that will be able to provide for the number of new homes required to be delivered within the Plan period. Evidence to confirm this will need to be published as the Local Plan Review progresses.
- In the interests of progressing the Local Plan in the most efficient and sound way, a balanced approach is needed allowing for some Green Belt release which is complemented by development on brownfield sites which is truly deliverable and developable without putting added pressure on communities and infrastructure within the identified settlements.

#### Sat-plan on behalf of Stewart Milne Homes

- Meeting housing needs within the existing urban area (brownfield land) and developing such Sites ahead of any Green Belt Release is in line with paragraph 137 of the NPPF but this must be balanced against the realistic ability to deliver such Sites which are often constrained. There may not be enough specific, 'deliverable' or 'developable' sites within the urban area and on existing brownfield sites that will be able to provide for the number of new homes required to be delivered within the Plan period. Evidence to confirm this will need to be published as the Local Plan Review progresses.
- In the interests of progressing the Local Plan in the most efficient and sound way, a balanced approach is needed allowing for some Green Belt release which is complemented by development on brownfield sites which is truly deliverable and developable without putting added pressure on communities and infrastructure within the identified settlements.

#### Gladman

- Gladman consider that a mixed approach including development on both brownfield and greenfield sites is required.
- The consultation document highlights that the supply of brownfield land is declining and the ability to bring these sites forward may be difficult in regard to viability. As such, it is important that a sufficient number of greenfield sites are identified to meet housing needs.

#### Abbott Associates on behalf of Southport Land and Property Group

- The new Local Plan ought to recognise that it is often more expensive and more complicated to develop brownfield sites because of the abnormal costs they may carry.
- The Local Plan should not include a restrictive policy which requires a sequential test search for brownfield sites prior to greenfield sites being developed.

#### Cockwill on behalf of Melford Construction

- There is too much presumption that brownfield development should come first and a close mind approach is given for greenfield sites. Each site should be more openly objectively considered when coming forward for development.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

J10 Planning on behalf of W Ainscough Esq

- Follow national policy - most PDL sites are unviable or won't be released or known about until they become available - you cannot compel PDL to come forward

PWA Planning on behalf of Applethwaite Homes

- Whilst development of brownfield land should be encouraged, there are numerous sites within the Borough which are classified as 'greenfield' which have limited value to the rural character of the area and lie close to existing areas of built form in highly sustainable locations. This includes land to the east of Boundary Lane in Hesketh Bank.

Turley on behalf of David Wilson Homes

- DWH's is broadly supportive of setting out a preference for brownfield development; however, this should not be framed as a restriction to development on greenfield sites. Development on greenfield sites should be assessed against other policies in the local plan.
- It is therefore considered that a policy approach to development on greenfield sites should not be defined until the appropriate evidence base exists to inform the need for the use of greenfield sites to meet development needs.
- The policy also needs to be sufficiently flexible to allow for densities to vary across site, particularly on larger sites, as this will enable better place-making.

PWA Planning on behalf of Jeff Hill

- Development needs can be met on brownfield sites alone.
- Some greenfield land release will be needed.
- Sustainable greenfield sites should be considered for development.
- Site located within close proximity to the settlement of Skelmersdale to the north of Beacon Lane on land associated with Whaley Farm, represents an appropriate greenfield site to deliver significant housing numbers for the settlement whilst protecting more open greenfield sites.

Pegasus Group on behalf of Bloor Homes

- Do not support either approach as not consistent with the NPPF. Assess how much brownfield land is available for development; some greenfield land will need to be released for development.

WSP on behalf of Seddon Homes Ltd.

- Seddon support the preferred approach of following national policy.
- A sequential approach is not compliant with national policy.

Pegasus Group on behalf of Rowland Homes

- Rowland is supportive of this policy and the preferred approach suggested by the Council

Pegasus Group on behalf of Story Homes

- Brownfield sites have viability constraints whereas greenfield sites are less constrained. The Brownfield Land Register shows that there is not enough brownfield land available to meet needs and so greenfield sites will be required.

#### **5. Are there any particular brownfield sites that you consider would make good housing sites?**

11 respondents answered this question.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Residents and members of the public:

- BK031 land at Newbridge Farm, Stopgate Lane, Simonswood.
- Disused garage on A59 next to Royal Oak which is currently an eyesore
- Round O quarry
- Develop brownfield land behind Quattros Italian restaurant as per plan site BK023
- Old air field adjacent to Burscough industrial estate could be used for housing providing there is investment in the infrastructure in the area.
- Between Church St & Derby St would be ideal for another Brookside but not for students

#### Borough, Parish, Town Councillors / Community Groups:

- Former Skelmersdale Development corporation on High Street, Skelmersdale.
- Land adjacent to Railway tavern, Railway Road. (has been subject to a planning application but has not progressed)
- Former nursery, adjacent to the Sandpiper public house. This is in Green Belt but could be a suitable rural exception site
- New Court Way, Ormskirk
- Several vacant/under-utilised units on the Gillibrands industrial estate.
- There are numerous sites across the Borough, the council is well aware of all of them.

#### Organisations, including developers, landowners and representatives:

##### PWA Planning on behalf of Appleshwaite Homes

- As noted above in answer to question 4, whilst the site to the east of Boundary Lane is not classified as brownfield land it detracts from the visual quality of the locality by virtue of its vacant nature. Its development would represent a great improvement to the area despite it currently being classified as a greenfield site and Protected Land, particularly through the provision of much needed specialist bungalow housing of the over 55s. This site is also subject to a detailed SHELAA submission.

#### **6. Should we try and use as little 'new' land as possible for housing by requiring high density development, or should we encourage more gardens and open / natural space in new developments and allow for lower densities? (Please mark on a sliding scale)**

25 respondents answered this question. 6 respondents marked '1 - use as little 'new' land as possible for housing by requiring high density development', 8 respondents marked '3' and 6 respondents selected 'No - We should encourage more gardens and open / natural space in new developments and allow for lower densities'.

#### **7. Which do you think is the best approach towards housing density?**

35 respondents answered this question.

#### Residents and members of the public:

- Density should not destroy farmland or green spaces. Existing and sustainable locations should be considered first.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Allow for lower density but each site should be assessed for its own character and accessibility to outdoor spaces and parks in the area.
- Current policies are too prescriptive. Allow higher density where places are more sustainable.
- New sites need to be as high density as possible whilst ensuring the appropriate amenities are provided.
- Have a flexible approach depending on location.
- High density can be appropriate in large settlements
- Low rise flats with communal gardens to provide green space
- Well maintained parks and communal gardens close to high density housing
- Include average sized gardens for residents.
- High density with garden space.
- Skelmersdale is an example of what not to do: poorly insulated housing, poorly used greenspaces. Sustainable developments change with the changing population.
- Higher density in existing towns; lower density in villages.
- Do not build on open spaces around Ormskirk. Density should be site specific.
- Objects to options 1 to 3. Follow national policy. Housing should be in multistorey blocks and communal green spaces can result in an efficient use of land and is good for mental wellbeing.
- Build on brownfield sites and protect greenfield sites.
- Development should fit in with the surrounding character.

#### Borough, Parish, Town Councillors / Community Groups:

- The Preferred Approach offers the flexibility to ensure that a single target density does restrict the delivery of the right mix of housing. The 3 Alternative Approaches set out in b) Density are therefore not supported.
- High density in towns.
- High density housing does not have to have few facilities.
- Have a flexible approach depending on location.
- Strike a balance between housing density and communal green spaces.

#### Organisations, including developers, landowners and representatives:

##### Oaktree Development

- Let the market choose but have guidelines in certain locations.

##### Sat-plan on behalf of Gleeson Homes

- Discuss and consult with the development industry what approach to density patterns across the borough should be considered

##### NJL Consulting on behalf of owner/developer

- Follow national policy but cater for individual sites and circumstances.

##### Sat-plan on behalf of Stewart Milne Homes

- Discuss and consult with the development industry what approach to density patterns across the borough should be considered

##### Gladman

- Gladman support the preferred approach.

##### Abbott Associates on behalf of Southport Land and Property Group

- Not everyone wants a big garden, so there needs to be variety of density.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

Emery Planning on behalf of Redrow Homes and Wainhomes North West

- Objects to blanket density across the Borough, density needs to change depending on the site.

Cockwill on behalf of Melford Construction

- Housing market demand should dictate density in the suburbs, minimum standards in town centre locations.

J10 Planning on behalf of W Ainscough Esq

- Be flexible.

PWA Planning on behalf of Applethwaite Homes

- Density should be site specific.

PWA Planning on behalf of Jeff Hill

- Density should be site specific. How will biodiversity net gain requirements affect developments, harder to achieve on higher density developments and brownfield site.

Pegasus Group on behalf of Bloor Homes

- Support a policy with flexibility, taking into account site specific characteristics.

WSP on behalf of Seddon Homes Ltd.

- Density policy should follow national policy.

### **8. Should we vary our density policy in different parts of West Lancashire? Why / why not?**

26 respondents answered this question.

#### Residents and members of the public:

- Yes. Prioritise areas with sustainable facilities and transport for new development.
- Should be assessed on a site by site basis.
- Yes, one size fits all approach won't work.
- Density should be in keeping with the existing settlement but allow for exceptions.
- Avoid urban creep.
- Yes, to allow a range of houses to be built.
- Yes, flexible and offer garden space at an affordable price
- Yes, flexible to respect existing green spaces.
- Yes, flexible. Not just about height of the buildings either.
- No. Build on brownfield sites only.

#### Borough, Parish, Town Councillors / Community Groups:

- Yes, housing density should be variable and based on evidenced need.
- Yes, higher density in towns.
- Yes, housing should meet the needs of everyone.
- Yes, flexible to take account of viability, character and market demand.
- Yes, flexible. Density should vary across the Borough to be in keeping with local area.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Organisations, including developers, landowners and representatives:

Emery Planning on behalf of Wain Estates Limited

- Yes, flexible to take account of need and site-specific constraints.

Emery Planning on behalf of Redrow Homes and Wainhomes North West

- Yes, flexible.

Cockwill on behalf of Melford Construction

- Flexible.

J10 Planning on behalf of W Ainscough Esq

- Yes, flexible.

PWA Planning on behalf of Applethwaite Homes

- Flexible. Should relate to the site and the wider site context.

PWA Planning on behalf of Jeff Hill

- No policy thresholds, should be based upon the proposal and the site context.

WSP on behalf of Seddon Homes Ltd.

- Different densities in different parts of the Borough.

#### **9. Do you have any other comments on this topic?**

20 respondents answered this question.

#### Residents and members of the public:

- Better to use brownfield sites even if they are expensive to build on.
- Higher density housing has bigger impact on roads, car parking in Ormskirk, pollution, flooding and access to services.
- Have wide road verges to separate homes from traffic.
- New builds should be net zero carbon and consider flooding issues.
- Consider residential amenity.
- Create a hierarchy for dwelling types in terms of the density of land usage. Apartments at the top as the most efficient option with detached bungalows at the bottom as the most land hungry and energy inefficient.
- Protect greenfield sites, Green Belt and farmland.
- Density is not an issue; using Grade 1 Agricultural Land is an issue.
- No more student accommodation in Ormskirk.

#### Borough, Parish, Town Councillors / Community Groups:

- Clear planning policy is needed because some decisions can be subjective and lacking in fairness or transparency to residents.

#### Organisations, including developers, landowners and representatives:

NJL Consulting on behalf of owner/developer

- Important to retain employment areas; not every settlement has brownfield sites available.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

Asteer Planning on behalf of Richborough Estates Ltd.

- The Council must identify its housing requirement and urban capacity before considering density. High densities can be achieved on sustainable non-urban sites.

Acland Bracewell on behalf of Tarleton Estates Limited and Lilford 2005 Limited (Lilford Estate)

- Adopt a flexible approach to density.

#### Statutory consultees and other organisations:

United Utilities

- United Utilities wishes to note that any approach to density should factor in the need for good design which should include considering how new development sites can incorporate high quality sustainable drainage and biodiversity net gain.

Sport England

- Sport England have no particular preference. Some green spaces define the character and appearance of a place and should not be lost to development.

### HC01c – DWELLING SIZES

A total of 35 respondents made comments in relation to HC01c - Dwelling Sizes.

#### **Questions:**

**10. What are your views on a policy on dwelling sizes? Should the Local Plan try and influence the size of new homes? Why / why not?**

30 respondents answered this question.

#### Residents and members of the public:

- Do have a policy on dwelling sizes.
- Do have a policy on dwelling sizes but also consider quality, sustainability and access to services.
- Yes, after speaking to residents and asking what they want. Assumptions can be made on future housing needs.
- Yes, there needs to be more smaller houses built.
- Yes, otherwise developers will just build houses that can gain them more profit.
- Yes, a wider choice of housing.
- Yes, agree.
- People want a home that is large enough for their needs, not necessarily a large home.
- Yes, need for a mix of housing but exceptions where a settlement needs to be "rebalanced" with dwellings to meet local specific needs. All houses should have adequate parking.
- Yes, houses should have large floor areas and high ceilings.
- Yes, there should be a mix of housing.
- Yes, smaller properties are needed.
- Yes, there needs to be a policy to allow for a mix of houses to cater for all ages.

#### Borough, Parish, Town Councillors / Community Groups:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- The Preferred Approach is considered to be the most appropriate option to drive the change that is needed.
- Any policy should be flexible as needs change over time.
- Yes, there needs to be a policy to allow for a mix of houses to cater for all ages.

#### Organisations, including developers, landowners and representatives:

##### Oaktree Developments

- Do not have a policy on dwelling sizes.

##### Sat-plan

- Yes, flexible policy approach needed.

##### Sat-plan on behalf of Stewart Milne Homes

- Yes, there should be a mix of housing and based on identified need.

##### Emery Planning on behalf of Redrow Homes and Wainhomes North West

- Any policy should be flexible as needs change over time and by location.

##### Cockwill on behalf of Melford Construction

- LPAs should not get involved in housing mix or size.

##### Turley on behalf of David Wilson Homes

- Support a mix of housing on sites but not a set requirement. Should be market-led.

##### Acland Bracewell on behalf of Tarleton Estates Limited and Lilford 2005 Limited (Lilford Estate)

- Yes, there should be a mix of housing.

##### Pegasus Group on behalf of Bloor Homes

- Yes, flexible policy approach based on evidence, nothing too prescriptive.

##### WSP on behalf of Seddon Homes Ltd.

- Yes, there is a need for a mix but there needs to be flexibility in the policy.

##### Pegasus Group on behalf of Rowland Homes and Story Homes

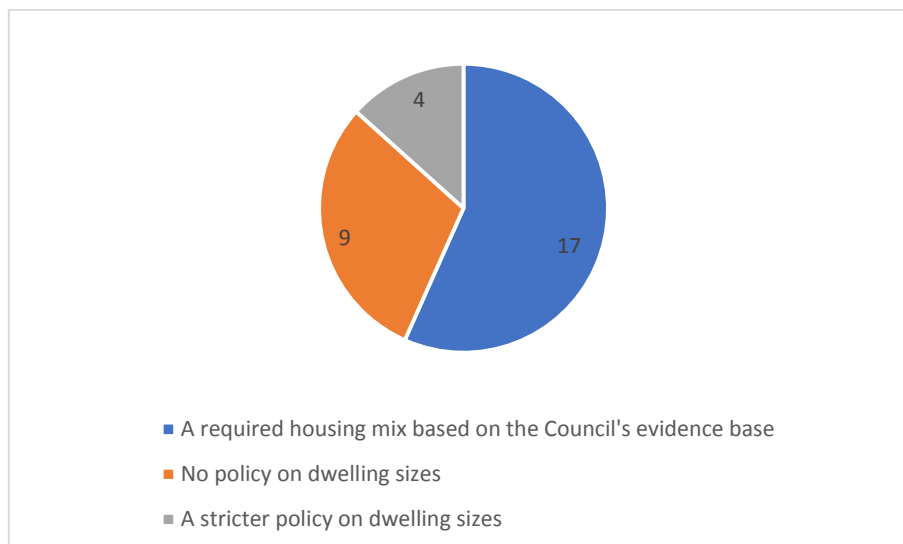
- Yes, there is a need for a mix but there needs to be flexibility in the policy.

#### **11. Which of the three approaches would you say is most appropriate?**

- **A required housing mix based on the Council's evidence base**
- **No policy on dwelling sizes**
- **A stricter policy on dwelling sizes**

30 respondents answered this question. Majority of respondents selected 'A required housing mix based on the Council's evidence base' approach (17 or 57%), followed by 'No policy' (9 or 30%) and 'A stricter policy' (4 or 13%).

### Scope, Issues & Options Feedback Report



#### Residents and members of the public:

- This should prove to be cost effective in meeting future housing demands.
- Need to see houses built better, not larger.
- Developers need to be guided into providing more sheltered community schemes, single floor bungalows and fewer standard box houses for a changing market over next 20 years.
- Should base on site context.
- This would remove the risk of profiteering by housing companies cashing in on more lucrative properties.
- The Council should try to persuade developers to build a range of property sizes on sites.
- It permits a decision to be made when the evidence base is available.
- Houses should be adaptable and large enough.
- This is not ideal, as the evidence base needs to be improved. Development design should not be developer led.

#### Borough, Parish, Town Councillors / Community Groups:

- The require housing mix would be better applied over all permissions over a period of time rather than on each development. An exclusion to this housing mix requirement for small developments should also be introduced.
- It is already evident that West Lancashire has an ageing population and this is likely to play out in a number of ways, from downsizing options to increased opportunities for shared living and greater care/residential home capacity.
- This gives residents options.
- The HBF does not consider that any of the three approaches is appropriate. The HBF understands the need for a mix of dwelling types and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF considers that the Council should also be aware that their evidence will only ever provide a snapshot in time and may be superseded by other evidence as development comes forward and need, demand or aspirations change.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Organisations, including developers, landowners and representatives:

##### Oaktree Developments

- This should be up to the market to provide or fall in line with any national standard.

##### NJL Consulting on behalf of owner/developer

- Clarity is needed on likely dwelling mix. However, some flex is needed.

##### Gladman

- Gladman support the preferred approach.

##### Emery Planning submitting on behalf of Wain Estates Limited

- Market demand should be factored into the assessment and/or the policy and a degree of flexibility is likely to be required.
- Consideration needs to be given to factors such as spare bedroom room for use as home office and guest.
- Locational factors should be considered.

### **12. If there were no policy on dwelling sizes, how would you suggest the Borough's housing stock be better balanced?**

9 respondents answered this question.

#### Residents and members of the public:

- There should be a policy.
- Equal share of detached / semi / terraced houses and number of rooms in houses.
- State a size of dwelling in square feet or metres and possibly a density.

#### Borough, Parish, Town Councillors / Community Groups:

- Differential CIL schedule that creates bigger payments for homes where need is lowest. Council tax holiday for elderly people who are downsizing. Limits on new student accommodation. Proportion of developments set aside for Council's own development company to provide affordable housing or a wider range of housing.

#### Organisations, including developers, landowners and representatives:

##### Cockwill on behalf of Melford Construction Ltd

- Let the market decide what is needed.

### **13. Should the Council adopt the Nationally Described Space Standards? Please give reasons for your answer.**

20 respondents answered this question.

#### Residents and members of the public:

- Yes. But build higher density housing that allows a good quality of life.
- Yes, so long as it is the minimum standard to all accommodation.
- No. Every dwelling should be different.
- Maybe. Doesn't feel that they are knowledgeable enough to answer.
- Yes. But it would be better if the Council adopted higher standards.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Yes, as a minimum standard that should be higher.
- No, assess the national standards and produce the Council's own policy. There should be another consultation about this.
- Yes, as a minimum

#### Borough, Parish, Town Councillors / Community Groups:

- The Council should not adopt a smaller space standard. It could try for a larger standard, but this could be challenged by developers. So adopt the nationally prescribed space standard.
- The Council will need robust justifiable evidence to introduce the nationally described space standards (NDSS), based on the requirements set out in the PPG.
- The Space Standards seem adequate.

#### Organisations, including developers, landowners and representatives:

##### NJL Consulting on behalf of owner/developer

- No unless there is flexibility in the policy to allow for market trends and different products.

##### Sat-plan on behalf of Stewart Milne Homes

- Do not agree that policy should be prescriptive and flexibility is required.

##### Gladman

- Gladman appreciate that the Council may want to introduce these standards, it is incumbent on the local authority to demonstrate the need for the standards.

##### Turley on behalf of David Wilson Homes

- If WLBC is considering on introducing the NDSS evidence of the need to justify this will be necessary, as required by the PPG.

##### Acland Bracewell on behalf of Tarleton Estates Limited and Lilford 2005 Limited (Lilford Estate)

- NDSS are not statutory and if in a policy should be for guidance only. The Council should continue to apply a flexible approach to space standards to ensure that development can respond to unique site characteristics and housing need.

##### Pegasus Group on behalf of Bloor Homes

- The Council will need to provide robust justifiable evidence to support the inclusion of these standards within the Local Plan, as per the requirements of the PPG.

## HC01d – AFFORDABLE HOUSING

A total of 35 respondents made comments in relation to HC01d - Affordable Housing.

### **Questions:**

**14. What do you think is the most important type of 'affordable' housing we should provide – please rank the types below (1 – highest priority; 4 – lowest priority)**

- **Social rent (properties rented from the Council or a Registered Provider)**

Scope, Issues & Options Feedback Report

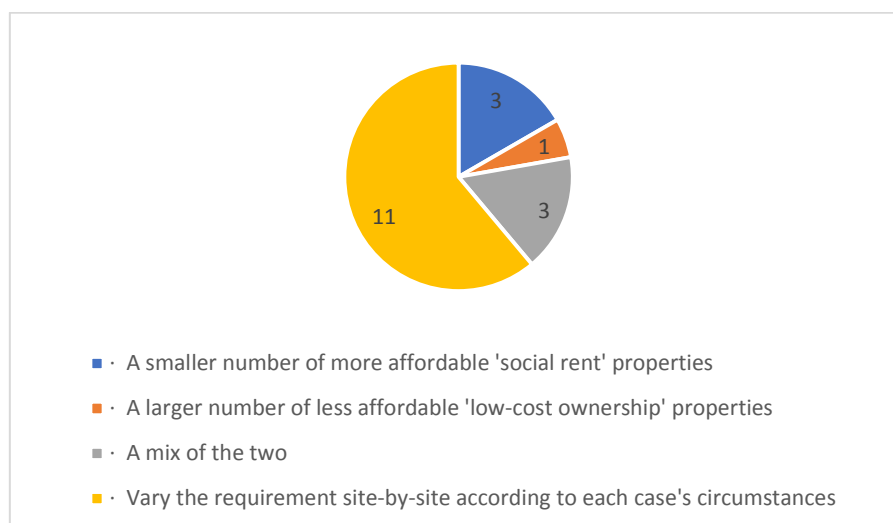
- Affordable rent / discount market rent (properties rented from a different body, but at a price below the market rent price)
- Shared ownership (occupiers pay some rent, and also pay towards purchasing a 'share' of the property)
- Low-cost (i.e. discounted) home ownership – homes for sale at below market value. This discount is passed on when the property is sold. This includes 'First Homes'

19 respondents answered this question. 9 respondents selected Social Rent as the highest priority and 5 respondents selected Shared ownership as the highest priority.

**15. Different types of affordable housing cost more (to the developer) to provide. Social rent costs the most to the developer, but is the most affordable to the occupier. Discounted market housing costs least to the developer, but is least affordable to the occupier. Which type should we go for?**

- A smaller number of more affordable 'social rent' properties
- A larger number of less affordable 'low-cost ownership' properties
- A mix of the two
- Vary the requirement site-by-site according to each case's circumstances

19 respondents answered this question. 11 favoured 'Vary the requirement site-by-site according to each case's circumstances' with equal support for 'Mix' and 'A smaller number of more affordable 'social rent' properties'. One respondent supported 'A larger number of less affordable 'low-cost ownership' properties'. One stated that 'A greater percentage of affordable homes' beyond the provided options.

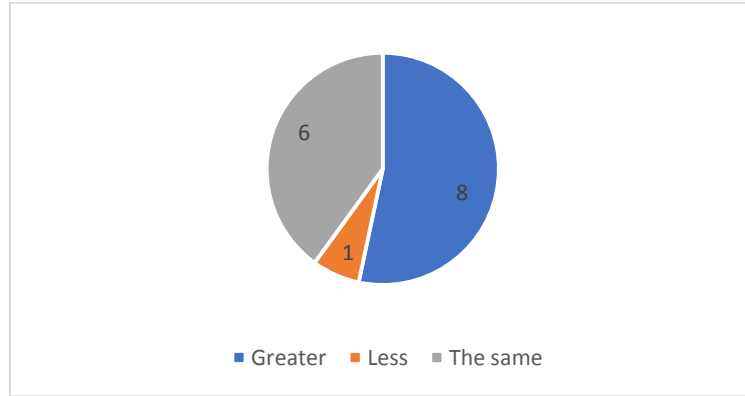


**16. Affordable housing is one of several 'desirables' coming off the back of new housing; there are only so many 'desirables' that can be provided whilst keeping schemes viable. What priority should affordable housing have in relation to:**

***Energy and water efficiency, and other 'green' measures? Greater / less / the same***

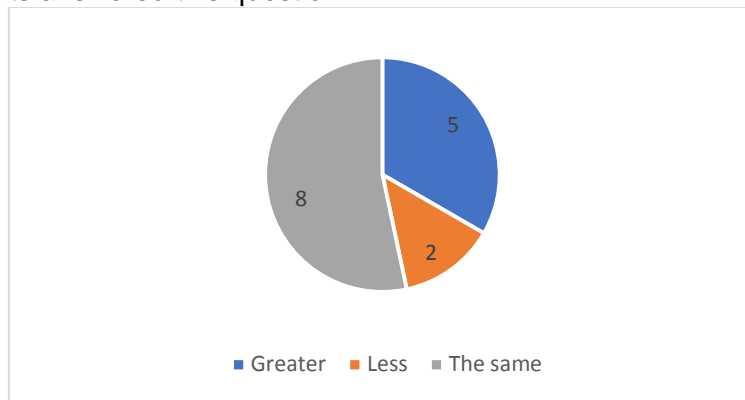
15 respondents answered this question.

Scope, Issues & Options Feedback Report



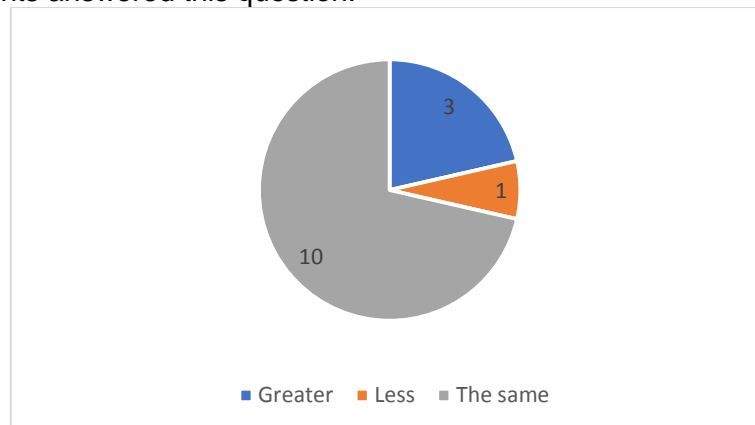
*Adaptable homes so they can meet different people's needs? Greater / less / the same*

15 respondents answered this question.



*Providing an appropriate mix of dwelling sizes? Greater / less / the same*

14 respondents answered this question.



**17. Do you have any other comments on this topic?**

25 respondents answered this question.

Residents and members of the public:

- Do not want any affordable family housing built.
- Meet local needs rather than a developer's and their profits.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Each development should be considered on its own merits as to be deliverable. All houses should be adaptable and energy and water efficient, with car parking to reduce on street parking.
- Orientation and design of new dwellings can minimise running costs. Solar panels on roofs, whether when properties are built or allowed for later installation.
- The Council should build social housing and not link it to private developers.

#### Borough, Parish, Town Councillors / Community Groups:

- Suggest that there be no affordable housing requirement at all on developers in Skelmersdale.
- Affordability affects social and market housing. Social rent housing should be considered more of a priority for the Council. Comments made on housing allocations policy.
- New developments should provide housing for all ages and be energy efficient in design. New developments should integrate with existing places.
- Have a viable balance between market and affordable housing delivery.
- NPPF guidance is good; there needs to be a mix of housing sizes including for affordable housing.
- Housing built in Burscough has been unaffordable and bought by people from outside of the area.

#### Organisations, including developers, landowners and representatives:

NJL Consulting on behalf of owner/developer

- Allow 100% exception schemes outside of settlements, consider each site on its own merits in relation to the settlement's needs, scale and proposed mix.

Sat-plan on behalf of Stewart Milne Homes

- Policy should be flexible and provision should be determined on a site by site basis.

Gladman

- Increase the overall housing requirement in the Local Plan to deliver more affordable housing.

Emery Planning on behalf of Redrow Homes and Wainhomes North West

- The current Local Plan approach has not delivered enough affordable housing. A similar amount of housing will be needed to deliver more affordable housing.

Emery Planning on behalf of Wain Estates Limited

- The current Local Plan approach has not delivered enough affordable housing. A similar amount of housing will be needed to deliver more affordable housing. Some parishes have had no delivery of new affordable housing.

Turley on behalf of David Wilson Homes

- DWH considers that any policy setting out requirements for the percentage of dwellings within a development to be provided as affordable housing should be as flexibility as possible, taking into account viability and on-site management issues, also needs to be consistent with the latest Government policy on First Homes.

Acland Bracewell on behalf of Tarleton Estates Limited and Lilford 2005 Limited (Lilford Estate)

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Lilford Estate consider that the current approach to seeking affordable housing is reasonable however, as part of the emerging Local Plan this would need to be tested in viability terms.

Pegasus Group on behalf of Bloor Homes

- Support the provision of a mix of housing, but it should be based on local needs.

WSP on behalf of Seddon Homes Ltd.

- Support the Council's preferred approach. Policy needs to be flexible to take account of viability.

Pegasus Group on behalf of Rowland Homes and Story Homes

- Support the preferred approach. Exceptions should also include build to rent, self-build homes, and specialist needs accommodation (elderly and student accommodation).

### Statutory consultees and other organisations:

Environment Agency

- Energy and water efficiency measures should have greater importance than the provision of affordable housing when talking about the climate emergency. This should be in locations where there is a supply of affordable housing and no more is needed.

Arup on behalf of United Utilities

- New houses should have higher water efficiency standards, this will save money for homeowners.

## HC01e – HOUSING FOR OLDER PEOPLE

A total of 33 respondents made comments in relation to HC01e - Housing for older people.

### **Questions:**

#### **18. How important is it to provide housing for older people, compared with other housing needs? (Sliding scale: 1 – Least important; 10 – Most important)**

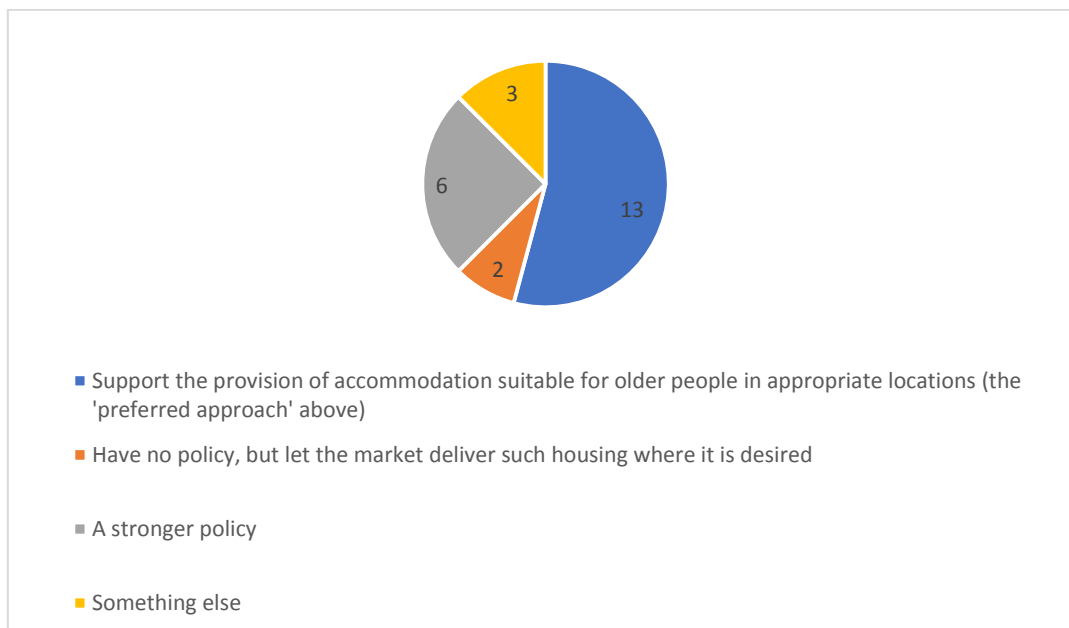
21 respondents answered this question. 13 respondents answered scale 1 to 5 and 8 respondents answered scale 6 to 10. 3 respondents stated 10 - Most important.

#### **19. Which of the policy options above would you prefer?**

- **Support the provision of accommodation suitable for older people in appropriate locations (the 'preferred approach' above)**
- **Have no policy, but let the market deliver such housing where it is desired**
- **A stronger policy**
- **Something else (please specify what this is below)**

24 respondents answered this question, majority of respondents supported preferred approach' (13 or 54%), followed by the 'A stronger policy' (6 or 25%) and 2 respondents favoured 'No policy' (8%). 3 respondents specified something else.

Scope, Issues & Options Feedback Report



Residents and members of the public:

- Elderly people have different needs to a growing family.
- A good start would be to renovate some existing social housing for the elderly and stop selling them to tenants resulting in a shortfall for need.
- Have no policy and let the market decide.
- Consider success of Brookside and St Michael's houses.

Organisations, including developers, landowners and representatives:

J10 Planning on behalf of W Ainscough Esq

- Consider different models of housing delivery; supply of new stock won't be suitable for older persons.

**20. In what ways do you think we should try and ensure the provision of housing for older people?**

24 respondents answered this question.

Residents and members of the public:

- Use brownfield sites to provide accommodation for elderly people
- Make sure the mix of housing allows elderly people to find housing that suits their needs.
- Include it in the requirement for larger developments
- Stronger housing policies that support a mix of housing.
- If no suitable housing is built for the elderly, they will stay living where they are.
- All new developments should provide for housing for the elderly or young and it should not look like old people's homes.
- Encourage supported living in shared accommodation, similar to Brookside in Ormskirk. Flats should have 2 or 3 bedrooms to allow for a study and guests to stay.
- Elderly need to be integrated into the community.
- Make it part of the housing mix.
- Do not mix older people accommodation with family housing.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Borough, Parish, Town Councillors / Community Groups:

- Questions whether it is necessary for all houses to be accessible / adaptable because it might not be appropriate for large family homes to be adaptable. Small clusters of housing for older people can integrate into developments.
- Only adopt the higher accessibility standards if the criteria in the PPG is applied. Provide accommodation for older people as part of larger sites, and also look to allocate sites specifically for accommodation for older people.
- Questions the terminology used in the question. The building regulations changes can also support people who have pushchairs. Questions whether the proposed policy would apply to flats.
- Provide more bungalows; older people accommodation is needed in Bickerstaffe.

#### Organisations, including developers, landowners and representatives:

##### Gladman

- Any accessible and adaptable housing standards will need to be justified by evidence.

##### Emery Planning submitting on behalf of Wain Estates Limited

- Use Class C2 is not identified in the household projections used to calculate the Local Housing Need and therefore needs to be identified and planned for. Consider site-specific allocations for older people accommodation.

##### Cockwill on behalf of Melford Construction Ltd

- Identify specific sites that permission will only be granted for such housing as flats specifically for older people and bungalows.

##### PWA Planning on behalf of W Ainscough Esq

- Let the market deliver housing where it is needed; but operators can't compete with market housebuilders and therefore specific allocations may be needed.

##### PWA Planning on behalf of Applethwaite Homes

- Refers to evidence in the HEDNA 2017 of high need for older people accommodation. There should be exceptions to allow for specialist accommodation to be built outside of settlement boundaries. Promotes a site in Hesketh Bank for over 55s age-restricted accommodation.

##### Pegasus Group on behalf of Bloor Homes

- Specifically allocate sites for older people accommodation; may consider sub-dividing part of a larger site for older people accommodation. Any accessibility standards would need to meet the criteria in PPG.

##### WSP on behalf of Seddon Homes Ltd.

- There should be a flexible approach to meet need and it is important to take into account viability when considering mix and accessibility standards.

##### Pegasus Group on behalf of Rowland Homes and Story Homes

- Specifically allocate sites for older people accommodation. Any accessibility standards would need to meet the criteria in PPG.

#### **21. Do you have any other comments on this topic?**

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

14 respondents answered this question.

#### Residents and members of the public:

- The design of developments should allow for accommodation for older people.
- Providing houses for older people allows people to downsize, but the quality of the houses needs to be good enough to attract people to downsize.
- Doesn't want to leave the area.
- You don't know what older people want.

#### Borough, Parish, Town Councillors / Community Groups:

- No mention in the policy area of the option to accommodate more sheltered or apartment-style retirement homes.
- Comments on building regulations matters. Specific sites should be identified for older people accommodation.
- The population of Bickerstaffe is 50% senior citizens and the development of appropriate accommodation with amenities is desirable.
- No bungalows have been built. Not all elderly people want expensive apartments. More bungalows would allow for homes to be released to younger people; in Burscough.

#### Organisations, including developers, landowners and representatives:

Emery Planning on behalf of Redrow Homes and Wainhomes North West

- Use Class C2 is not identified in the household projections used to calculate the Local Housing Need and therefore needs to be identified and planned for. Any accessible and adaptable housing standards need to be justified by evidence.

PWA Planning on behalf of W Ainscough Esq

- The need for older people accommodation won't always be accommodated in the key settlements because of lack of sites / capacity.

Acland Bracewell on behalf of Tarleton Estates Limited and Lilford 2005 Limited (Lilford Estate)

- Support the approach to provide elderly people accommodation in the most sustainable locations. Specialist housing (Use Class C2) should come under a separate policy to normal housing in the Local Plan and not contribute to the Council's housing target.

## HC01f – CUSTOM AND SELF-BUILD HOUSING

A total of 21 respondents made comments in relation to HC01f – Custom and Self-Build Housing.

### ***Questions:***

**22. Should we have policies for the provision of self- and custom-build housing or just let the market deliver it? Please explain your answer.**

15 respondents answered this question.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Residents and members of the public:

- Yes, where it is justified but not on green belt or agricultural land.
- Yes. Self-builders create stable communities; the market cannot deliver custom-built housing,
- Yes, but self-build should be sustainable and zero carbon.
- Yes, grant planning permission when single plots are requested and don't refuse planning applications.

#### Borough, Parish, Town Councillors / Community Groups:

- As the self-build register is operated on a fee-paying basis, it limits registrations of interest. The policy should be adopted and the process and current fee structure for inclusion on the register should be reviewed and revised to ensure that real demand is captured and not discouraged.
- Any percentage requirement on sites should be viability-tested, there are also issues with the practicalities of construction, and the desire of self-builders to live in these areas. Base the policy on the need identified in the self-build register.
- Can provision be made for those who wish to build as a collaborative group?

#### Organisations, including developers, landowners and representatives:

NJL Consulting on behalf of owner/developer

- Yes, but flexibility is needed.

Gladman

- Support the preferred approach. Any percentage requirement on sites should be viability-tested.

Emery Planning on behalf of Redrow Homes and Wainhomes North West

- Any approach would need to be justified by evidence. Suggests an alternative approach of identifying need, and then inviting Call for Sites of self/custom build plots only and allocating them accordingly.

Turley on behalf of David Wilson Homes

- Prefer an alternative approach of identifying need based on the self-build register and then allocating specific sites to meet said need. Any percentage requirements on large sites would need to have a clause to allow the developer to build the house if there is no demand over a certain amount of time.

### **23. If we are to provide self- and custom-build housing, how should our policies seek to do this?**

9 respondents answered this question.

#### Residents and members of the public:

- Specify a certain percentage in each development.
- Provide serviced plots.
- Look for small sites that may be suitable.

#### Borough, Parish, Town Councillors / Community Groups:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Do not allocate specific sites for self-build as market take-up in less desirable locations be may low. Offer self-build plots within larger development sites and define the land values during the planning application process and set a time limit on take-up.
- A policy should list some ideals such as energy efficiency and innovation.

#### Organisations, including developers, landowners and representatives:

NJL Consulting on behalf of owner/developer

- Be flexible. People may not want to have a self-built plot on a housing development and may want something individual in nature.

Cockwill on behalf of Melford Construction Ltd

- Identify potential self-build sites instead of allocating individual plots. A master developer would be able to prepare serviced plots to allow for better design.

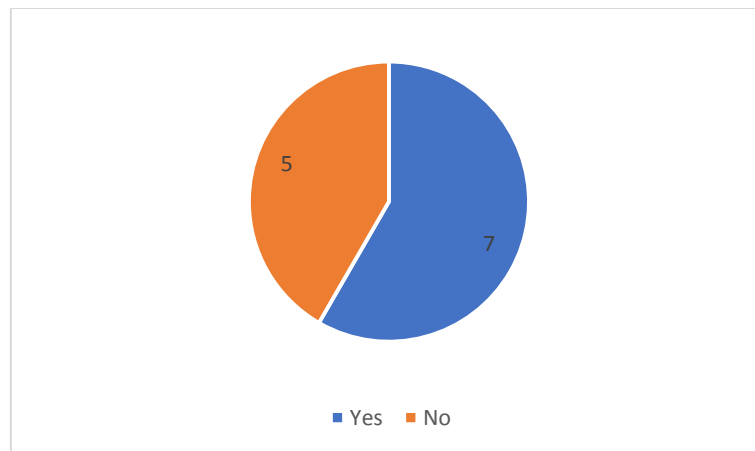
PWA Planning on behalf of W Ainscough Esq

- Support and encourage a mix of tenure opportunities on sites, including delivery on exception sites.

#### **24. Do you support the following?**

***- Requiring a percentage of plots on large allocated housing sites to be made available for CSB housing (Y / N)***

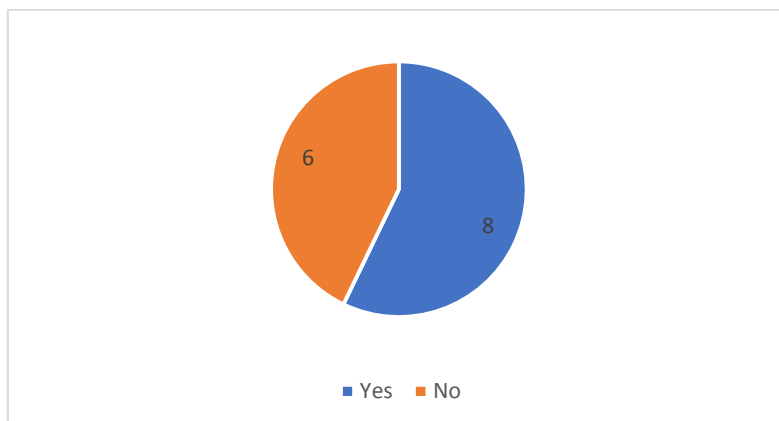
12 respondents answered this question.



***- Allocating sites specifically for SCB housing (Y / N)***

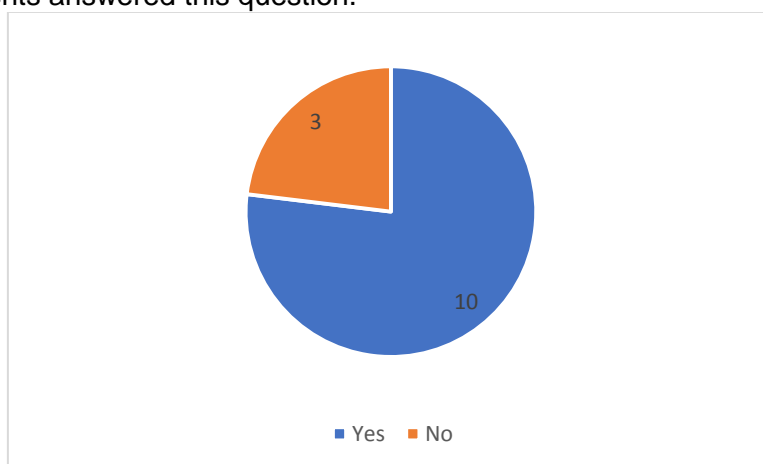
14 respondents answered this question.

Scope, Issues & Options Feedback Report



- Allowing affordable SCB properties on rural 'exception sites' (Y / N)

13 respondents answered this question.



**25. Do you have any other comments on this topic?**

11 respondents answered this question.

Residents and members of the public:

- Self-build provides a variety of housing design.

Borough, Parish, Town Councillors / Community Groups:

- Consideration should be given to how design of self-build houses will fit in with a larger housing development. Compliance with Council design guides should not restrict potential to deliver unique and innovative housing solutions on the self-build plot.
- The policy should not allow difficult / bad bits of a site to be set aside for self-build; there could be a preference for self-build or local build on sites that are in sustainable locations.

Organisations, including developers, landowners and representatives:

NJL Consulting on behalf of owner/developer

- Many self-build needs are for individual sites away from large new-build sites. Look at self-build on a sub-Borough wide area, rather than across the whole Area.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

Emery Planning submitting on behalf of Wain Estates Limited

- Do not object to the policy preferred approach if it is justified by the evidence. Alternatively, identify geographic areas of need and allocate specific sites.

PWA Planning on behalf of W Ainscough Esq

- Not all self-builders want to build on allocated sites.

Pegasus Group on behalf of Bloor Homes

- Do not support setting aside a percentage of a site for self-build, it should be considered on a site-by-site basis. The self-build register alone is not good enough evidence of demand for self-build. It should be an encouragement policy, rather than one that requires a set amount of self-build plots.
- Any policy should require a clause that allows for undeveloped self-build plots to come forward for market housing.

Pegasus Group on behalf of Rowland Homes and Story Homes

- Do not support setting aside a percentage of a site for self-build, it should be considered on a site-by-site basis. The self-build register alone is not good enough evidence of demand for self-build. It should be an encouragement policy, rather than one that requires a set amount of self-build plots.

#### Statutory consultees and other organisations:

United Utilities

- The delivery of infrastructure should not be fragmented when considering custom and self-building housing sites. Careful consideration will need to be given to the mechanism for delivery of infrastructure to ensure a co-ordinated approach.

### HC01g – STUDENT ACCOMMODATION

A total of 20 respondents made comments in relation to HCO1g - Student Accommodation.

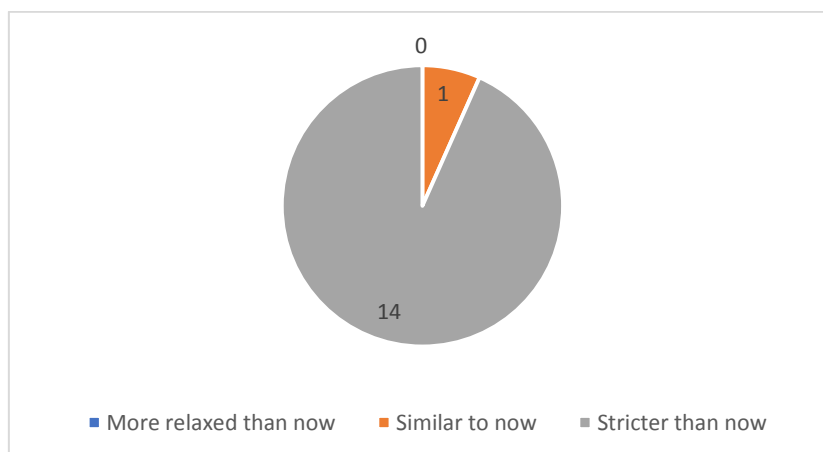
#### ***Questions:***

**26. What approach should we take towards HMOs? Please explain the reason(s) for your answer.**

- **More relaxed than now**
- **Similar to now**
- **Stricter than now.**

15 respondents answered this question. A large majority of respondents favoured a stricter approach (14 or 93%) and only 1 respondent agreed a 'similar to now' approach.

Scope, Issues & Options Feedback Report



Residents and members of the public:

- HMO properties are not neighbourhood-friendly.
- More HMOs cause a shortage of family housing. Student accommodation should be on campus.
- There are less university students as government policy is for more apprenticeships. Too many HMOs in Ormskirk, Council should buy back empty HMOs and convert them back to family homes.
- Avoid over-provision of student accommodation.
- Reduce maximum numbers of HMOs in areas, keep a percentage limit in the short-term. Convert HMOs back to family homes.
- The submission from Edge Hill university is already four years out of date. Student accommodation is only occupied a limited amount of time in the year. Number of unoccupied HMOs suggests that the market is over-supplied.
- If student accommodation is built in Ormskirk town centre, there should be no need for more HMOs. Loss of Council Tax revenue.
- Accommodation should be suitable for all age groups, including the elderly. Dwellings should meet sustainability standards.
- Purpose built student accommodation should be restricted to the non-Green Belt parts of the university campus. Support the use of commercial buildings in Ormskirk for PBSA. This will reduce the demand for HMOs.
- No more student accommodation is required.
- Residents of HMOs do not pay Council Tax to the Council. The Council should repossess vacant HMOs and sell as starter homes. Force landlords to sell properties in areas where there have been complaints. Students are only in Ormskirk for half of the year.

Borough, Parish, Town Councillors / Community Groups:

- More HMOs leads to less Council Tax income and waste collection problems. Data presented is dated. Evidence indicates that there is enough purpose built student accommodation and no need for more HMOs. Preferred approach is not supported as it is not justified by the evidence. Policy needs to reverse the number of HMOs.
- Residents of HMOs do not pay Council Tax to the Council.

**27. Where should we allow new purpose-built student accommodation (if needed)?**

**Please tick all that apply (Other (please specify))**

- **Nowhere**
- **EHU campus**

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- **Expansion of EHU campus**
- **As one of several possible uses on a limited number of specified / allocated sites in Ormskirk Town Centre**
- **Anywhere in Ormskirk Town Centre, subject to criteria being satisfied**
- **Anywhere in Ormskirk, subject to criteria being satisfied**
- **Elsewhere (please specify where)**

15 respondents answered this question. Most respondents selected 'EHU campus' (10 or 67%), 4 respondents selected 'EHU campus expansion' and 'Anywhere in Ormskirk'.

#### Residents and members of the public:

- Purpose-built student accommodation development should be restricted to the non-Green Belt parts of the campus only.
- The only place should be on campus. No extension to the campus grounds is to be permitted ever.

### **28. Do you have any other comments on student accommodation and HMOs?**

14 respondents answered this question.

#### Residents and members of the public:

- Expand the university campus and built student accommodation there. Build large-scale high density student HMOs on previously commercial sites.
- Demolish and re-build on-campus accommodation
- New accommodation in the town centre should be affordable to prevent students from being forced into run-down HMOs.
- Allow PBSA on campus and it frees-up HMOs for housing stock. Allowing the university to build more teaching buildings, increases the need for PBSA. Comment on HMO licensing procedure.
- Expansion of the university campus will allow houses in Ormskirk Town Centre to be sold reducing the need for more houses.
- Reduce the number of HMOs and improve the economy of Ormskirk.

#### Borough, Parish, Town Councillors / Community Groups:

- PBSA need is not proven and the student population growth figures do not support the need to increase the amount of student accommodation. Allow more student accommodation on campus and it may release HMOs in the town to be used as residential homes.
- There should be a ban on any more student HMOs and current HMOs should not be allowed to expand. Do a survey on occupancy rates in HMOs. Land at Hants Lane and New Court Way should not be developed for student accommodation.
- Build student accommodation on campus and this will reduce the number of HMOs in Ormskirk.
- There should be a cap on the number of HMOs in the area. Permitted development rights should be removed from HMOs. Undertake an occupancy rate survey on PBSA in Ormskirk town centre. Land at Hants Lane and New Court Way should be for residential use and not be developed for student accommodation.

#### Organisations, including developers, landowners and representatives:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Edge Hill University

- The University is broadly supportive of the Council's aims to control the development of HMOs, however in summary do not agree with any of the suggested policy area approaches in relation to student accommodation. It is the University's view that the preferred approach be broadened to support the extension of the existing campus eastwards and to the south of Southport Road that was previously promoted under policy 'SP8' of the withdrawn Local Plan.

#### Aster Planning LLP on behalf of Richborough Estates Ltd

- Richborough is strongly opposed to the restriction of student accommodation outside of the areas specified above. Richborough's land has the potential to meet the identified need for new purpose built student accommodation. Moreover, this policy is contrary to Policy EE04. It is important for this policy approach to be consistent and Richborough and Edge Hill University fully support an approach that accommodates the future expansion of the University, including across St Helens Road.

#### Statutory consultees and other organisations:

#### Trans Pennine Trail

- New student accommodation developments should include secure cycle parking and compliant sustainable transport routes (LTN1/20).

### HC01h – CARAVAN AND HOUSEBOAT DWELLERS

A total of 9 respondents made comments in relation to HC01h - Caravan & Houseboat Dwellers.

#### **Questions:**

#### **29. How should we help caravan or boat dwellers meet any additional accommodation needs?**

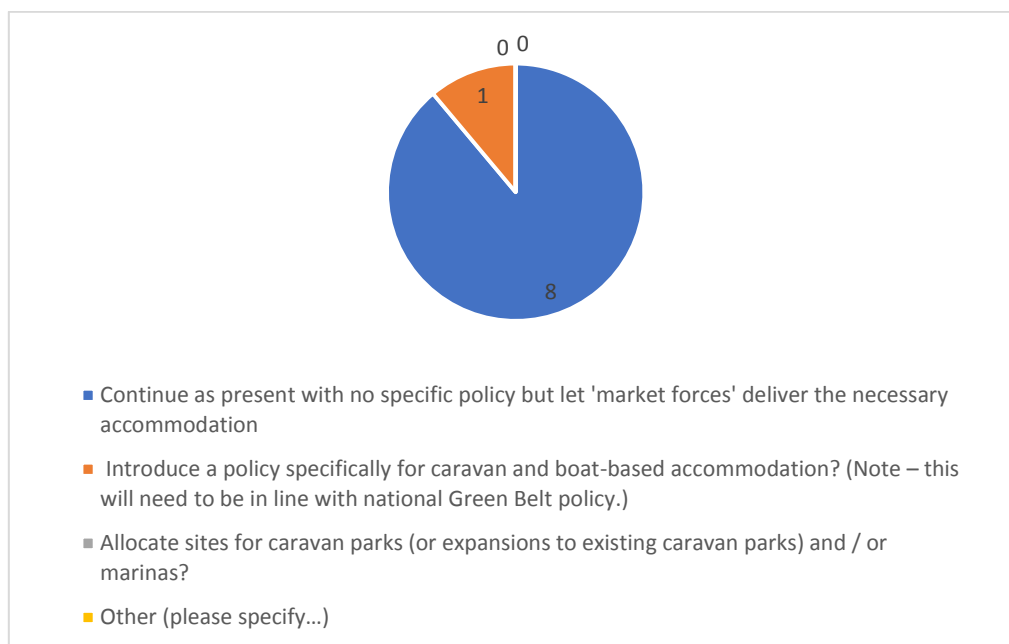
- **Continue as present with no specific policy but let 'market forces' deliver the necessary accommodation**
- **Introduce a policy specifically for caravan and boat-based accommodation? (Note – this will need to be in line with national Green Belt policy.)**
- **Allocate sites for caravan parks (or expansions to existing caravan parks) and / or marinas?**
- **Other (please specify...)**

A total of 9 respondents answered this question. Of the 9 respondents, 8 or 89% selected 'Continue as present with no specific policy but let market forces deliver the necessary accommodation' and 1 or 11% selected 'introduce a policy'.

#### Residents and members of the public:

- Allow extensions to marinas only.

Scope, Issues & Options Feedback Report



30. Do you have any other comments on this topic?

4 respondents answered this question.

Residents and members of the public:

- Allocating caravan sites in the Green Belt creates a profit for landowners. Develop a policy that allows residential dwellings on narrow boats in marinas.
- Caravan sites should not be on green belt land and should be sustainable for housing and biodiversity.
- Do not need to look for sites for travellers because they travel.

Borough, Parish, Town Councillors / Community Groups:

- Preferred Approach to continue with existing policy agreed based on there being no proven increase in demand for this type of accommodation.

**HC01i – GYPSIES AND TRAVELLERS & TRAVELLING SHOWPEOPLE**

A total of 18 respondents made comments in relation to HC01i - Gypsies and Travellers & Travelling Showpeople.

**Questions:**

**31. The Council is required by law to meet Travellers' accommodation needs. How can we do this in West Lancashire?**

11 respondents answered this question.

Residents and members of the public:

- Don't. What would happen if the Council breached the requirement? It is unacceptable to give land to those who have not paid for it. Do not support the use of CPOs.
- Agree with the suggested hybrid approach.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Do not support compulsory purchase of land. Traveller sites alongside housing will not work. Allocate existing sites even if they flood.
- Work with the Travelling community to find out what they want.
- Keep sites small so that they are easier to manage. Make planning permissions temporary.

#### Borough, Parish, Town Councillors / Community Groups:

- Whilst it may be required for sites to be located in sustainable locations, Travellers may not choose to live there and live in isolated places. Talk with the Travellers to find suitable sites. Work with neighbouring Councils to find sites.

#### Organisations, including developers, landowners and representatives:

##### Gladman

- Object to setting aside parts of proposed housing allocations for G&T sites as this can affect the deliverability of sites.

##### Emery Planning on behalf of Redrow Homes and Wainhomes North West

- The appropriate approach is to allocate suitable sites which are specifically put forward for such a use through a call-for-sites exercise. There should be no requirement for allocations for residential development to provide for gypsies and travellers as that will prevent sites coming forward.

##### Lichfields On behalf of Crompton Property Developments Ltd

- CPDL supports the Council in seeking to identify a permanent sustainable solution as part of the new Local Plan process and consider that Area J would be a suitable location.

#### Statutory consultees and other organisations:

##### Environment Agency

- Support the allocation of suitable, policy compliant sites but should avoid the allocation of sites (new or existing) in Flood Zone 3 and are likely to object to allocations that conflict with NPPF requirements.

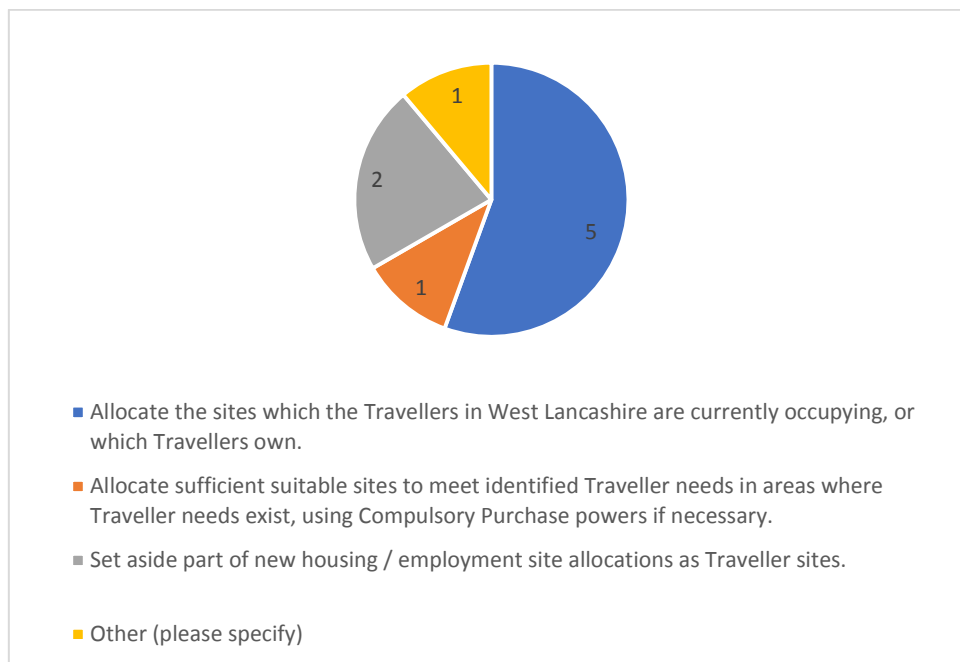
### **32. Which policy approach should we take? (Please tick all that apply.)**

- **Allocate the sites which the Travellers in West Lancashire are currently occupying, or which Travellers own.**
- **Allocate sufficient suitable sites to meet identified Traveller needs in areas where Traveller needs exist, using Compulsory Purchase powers if necessary.**
- **Set aside part of new housing / employment site allocations as Traveller sites.**
- **Other (please specify)**

A total of 9 respondents answered this question, 5 or 56% respondents selected 'Allocate the sites which the Travellers in West Lancashire are currently occupying, or which Travellers own'.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report



#### Residents and members of the public:

- Do not allocate.
- Find out what travellers need and want.

#### Statutory consultees and other organisations:

##### Environment Agency

- A blend of all 3 options should be taken so long as existing sites are not in Flood Zone 3 and allocated for permanent residential use.

33. Are there any policy approaches we should avoid taking? Please explain why.

6 respondents answered this question.

#### Residents and members of the public:

- Do not put travellers on new housing developments.
- Avoid green belt and being close to housing
- Sites must not be forced on communities
- Travellers should stay on sites that are currently occupied. They should not be able to set up a site just because they own the land.
- If the Council approves existing illegal sites it will just encourage everyone including non-travellers to do what they want.

#### Borough, Parish, Town Councillors / Community Groups:

- Object to the CPO approach and allocating parts of new residential sites for travellers. Possibly set aside part of proposed employment sites for travellers.

34. **Do you know of any sites (available or otherwise) that would be suitable as small Traveller sites? Please provide details.**

3 respondents answered this question.

#### Residents and members of the public:

- Near Hoscar Moss Sewage Works

Borough, Parish, Town Councillors / Community Groups:

- Former household recycling site adjacent to Rufford railway station.

**HC01j – TEMPORARY AGRICULTURAL WORKERS**

A total of 10 respondents made comments in relation to HC01j - Temporary Agricultural Workers.

**Questions:**

**35. How should we ensure that temporary agricultural workers have places to live?**

- **Continue as present, allowing for non-permanent accommodation in the countryside or for buildings to be converted**
- **Have a more relaxed approach. (In what ways should we relax it?)**
- **Have a more stringent approach. (What form would this approach take, and why?)**

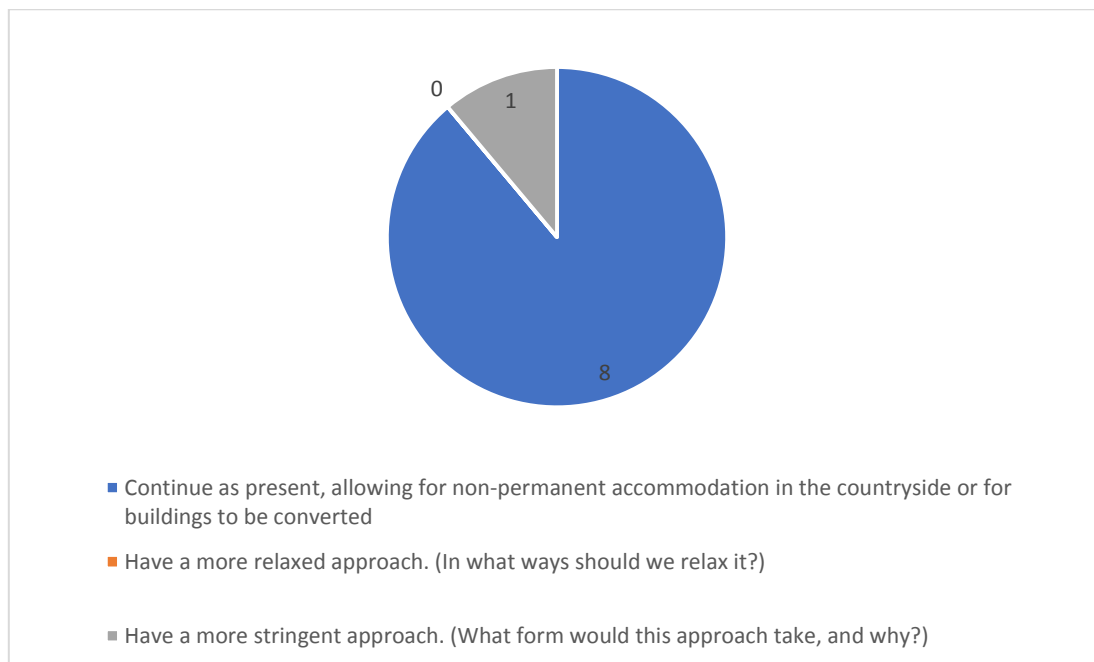
9 respondents answered this question. A large majority of respondents supported to 'continue present' (8 or 89%).

Residents and members of the public:

- Should be housed but not by destroying biodiversity or wildlife habitats. If housed a distance from work then free electric transport may be a solution.

Borough, Parish, Town Councillors / Community Groups:

- Not aware of workers unable to find accommodation.
- 



**36. Are there any sites in West Lancashire you consider would be suitable for temporary agricultural workers? Please provide details.**

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

1 respondent answered this question.

#### Borough, Parish, Town Councillors / Community Groups:

- No, it is not necessary. There is no evidence to suggest there is demand for temporary worker accommodation.

37. Do you have any other comments on this topic?

38.

2 respondents answered this question.

#### Borough, Parish, Town Councillors / Community Groups:

- Conversion of agricultural buildings should be controlled and be seasonal.

#### Organisations, including developers, landowners and representatives:

Acland Bracewell on behalf of Tarleton Estates Limited and Lilford 2005 Limited (Lilford Estate)

- The Lilford Estate supports the provision of a policy for Temporary Agricultural Workers and welcomes its continued incorporation within the Local Plan. It is requested that the future policy wording refer to existing agricultural buildings as being a form of 'existing building', the change of use of which to temporary agricultural accommodation is supported.

## HC02 – PLACE-MAKING

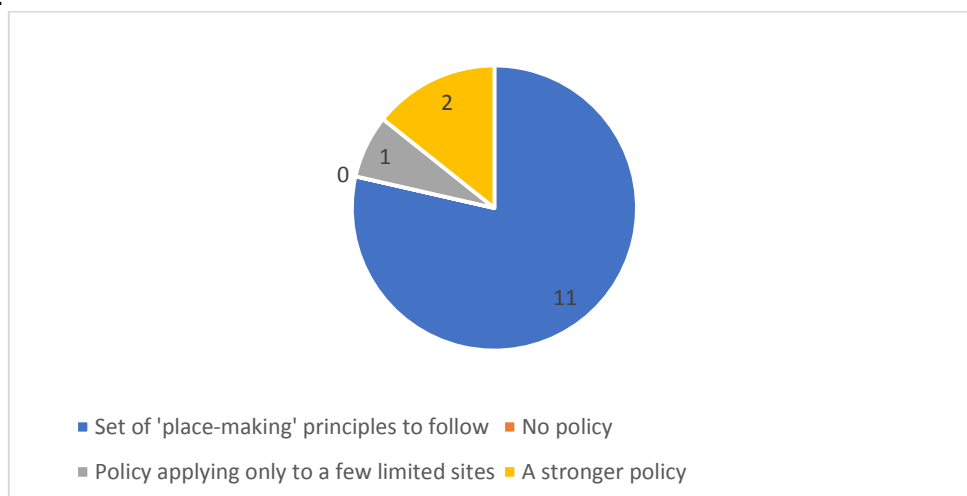
A total of 24 respondents made comments in relation to HC02 - Place-making.

#### **Questions:**

**39. Which of the approaches do you think we should follow with respect to 'place-making'? Feel free to give reasons for your choice(s)**

- a) Set of 'place-making' principles to follow***
- b) No policy***
- c) Policy applying only to a few limited sites***
- d) A stronger policy***

14 respondents answered this question. A large majority of respondents agreed to 'Set of 'place-making' principles to follow ' (11 or 79%). 2 respondents favoured 'a stronger policy' (2 or 14%).



#### Residents and members of the public:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- It is important to maximise health and wellbeing through good design.
- An environmental and sustainability project manager should review developments. Provide access through gardens for hedgehogs. House orientation is important to minimise lighting.
- Difficult for developments to fit in or complement the existing landscape if they have solar panels on the roof.

#### Borough, Parish, Town Councillors / Community Groups:

- A place making policy should consider the impacts of house building, i.e. traffic, as well as industrial. Support provision of green spaces if they are well thought out.
- Alternative Approach 3 is supported. Have a robust evidence base and that will defend against challenges at examination.

#### Organisations, including developers, landowners and representatives:

##### Gladman

- Support the proposed approach as it is consistent with the requirements of national policy.

##### Emery Planning on behalf of Redrow Homes and Wainhomes North West

- The local plan should not replicate guidance on place making of National Design Guide. The specific measures highlighted above are principles which Redrow Homes and Wainhomes North West work to and form part of the work enclosed as Appendix EP1 and Appendix EP2 which are the masterplans for the land west of Skelmersdale and Parris Lane respectively.

##### Cockwill on behalf of Melford Construction Ltd

- Place making policies are only really feasible on larger sites.

#### Statutory consultees and other organisations:

##### Environment Agency

- This approach will allow the council to consider key elements of making sustainable and successful neighbourhoods, without being too restrictive and hampering growth in areas where evidence demonstrates that all elements cannot be met equally.

### **40. Which place-making principles do you think are most important?**

12 respondents answered this question.

#### Residents and members of the public:

- Create safe places and reduce crime.
- Active travel. 20 minute neighbourhoods. Biodiversity net gain should not be exported to distant locations. Develop SUDS for run off from roads rather than into surface water courses or drains. Lots of flood risk in the area. Provide green spaces in developments if there is none nearby.
- 20 minute neighbourhoods. Prioritise human health well-being and allow natural environment to flourish.

#### Borough, Parish, Town Councillors / Community Groups:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Health is a key consideration. Needs to be better public transport to facilitate 20 minute neighbourhoods. Resilience to climate change for all development not just housing. No motor vehicles on new developments is unrealistic.
- Generally accepts the principles of the 20 minute neighbourhood but there needs to be flexibility to allow places to create a 20 minute neighbourhood.
- Access to community spaces and facilities in the local area and public transport.
- 20 minute neighbourhoods doesn't fit with the rural areas of West Lancashire.

#### Organisations, including developers, landowners and representatives:

Gladman

- The design of the buildings is as important as the design of the environment around them.

Cockwill on behalf of Melford Construction Ltd

- Hard and soft landscaping and reduce car speeds.

#### Statutory consultees and other organisations:

Environment Agency

- From an environmental perspective the principle that requires as much 'nature' (green spaces, gardens, trees, water) within easy reach of everyone, to aid physical and mental health and biodiversity, and to mitigate / provide resilience to climate change is most important.

Sport England

- Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice.
- Sport England along with Public Health England have launched guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. Active Design principles and the submission of checklist could be added to the design requirements in any emerging design policy.

**41. Is there anything we've missed in the policy? Please use the box below. Or is there anything that should be taken out of the policy? Why should this be taken out?**

3 respondents answered this question.

#### Borough, Parish, Town Councillors / Community Groups:

- In terms of design and place-making there is no mention of community involvement in the process and particularly at the earliest stages of concept and scheming. This was a key intention of the Government White Paper on planning reform that was published (and parked) in 2021.

#### Organisations, including developers, landowners and representatives:

NJL Consulting

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Consider how to balance place-making with density; some elements of place-making may be improved through lower density development. Links to viability and housing mix.

#### 42. Do you have any other comments on this topic?

14 respondents answered this question.

#### Residents and members of the public:

- Policy seems environmentally acceptable.
- There will always be cars and so the design of new estates must reflect this but design measures to separate pedestrians from vehicles.
- Cars will be carbon dioxide-free in the future.

#### Borough, Parish, Town Councillors / Community Groups:

- Update the baseline statistics that are in the Sustainable Development Study before policies and allocations are decided.

#### Organisations, including developers, landowners and representatives:

Turley on behalf of David Wilson Homes

- Support a place-making policy but it needs to be flexible; would object to a policy with specific requirements which would be used to refuse a planning application. Support site specific development briefs but they need to be justified, prepared with site developers and be flexible to account for changing circumstances.

Pegasus Group on behalf of Bloor Homes, Rowland Homes and Story Homes

- Support a flexible policy, as proposed. Site specific design briefs can be useful but it depends on the site, could be an option for the housebuilder to develop it, working with the Council.

#### Statutory consultees and other organisations:

Trans Pennine Trail

- Encourage developers to include sustainable transport schemes within new developments, including accessible seating and clear signage to facilities for walkers and cyclists.

United Utilities

- Supportive of a set of place-making principles and advise the Council uses documents such as Building for a Healthy Life.

Natural England

- Natural England welcome the inclusion of this policy, particularly the emphasis on nature and climate change.

Sport England

- See the Active Design: Model policy for Local Plans, which has been used by other Councils. Where Design and Access Statements are required to support an application they should explain how the design of the proposal embraces this role

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

and reflects the Active Design Principles. Consider the use of planning obligations and conditions. Consult public health leads for the area on planning applications.

Lancashire County Council

- Support the preferred policy approach but it should also be linked to economic growth that would support future business needs / demands and create jobs etc.

### HC03 – HERITAGE

A total of 14 respondents made comments in relation to HC03 - Heritage.

#### **Questions:**

**43. What would you say are the main issues relating to West Lancashire's heritage?**

7 respondents answered this question.

#### Residents and members of the public:

- Raise awareness and make it accessible to all age groups.
- Preserve existing sites and look to attract visitors.
- Lack of protection to sites that offer a varied history, such as East Quarry, Appley Bridge, Wigan.
- Preserve the assets but consider how to reduce energy and water use in these buildings.
- Protect all heritage and provide financial help to restore it.

#### Borough, Parish, Town Councillors / Community Groups:

- Development in Ormskirk is harming the town's heritage.
- Protect agricultural heritage.

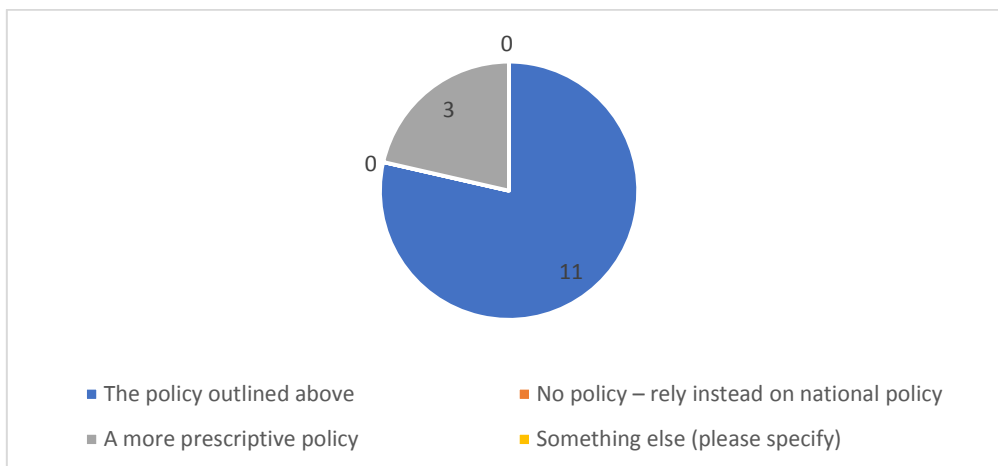
**44. What policy should we have on this subject?**

- **The policy outlined above**
- **No policy – rely instead on national policy**
- **A more prescriptive policy**
- **Something else (please specify)**

A total of 14 respondents answered this question. Of the 14 respondents, 11 or 79% selected 'The policy outlined above' and 3 or 21% supported 'A more prescriptive policy'.



Scope, Issues & Options Feedback Report



**45. Is there anything in our policy approaches that you particularly support or disagree with?**

6 respondents answered this question.

Residents and members of the public:

- East Quarry, Appley Bridge could be protected as a Site of Significant Scientific Interest (not relevant to the question and topic area).
- Agree that heritage sites should be preserved.

Borough, Parish, Town Councillors / Community Groups:

- Heritage is too easily disregarded in planning considerations.

Organisations, including developers, landowners and representatives:

Pegasus Group on behalf of Bloor Homes

- Support preferred approach. Add as many assets to the Proposals Map to assist with interpretation of the policies.

Pegasus Group on behalf of Rowland Homes and Story Homes

- Rowland and Story endorse the Council's preferred approach, in line with national policy but without being overly prescriptive.

**46. Do you have any other comments on this topic?**

4 respondents answered this question.

Residents and members of the public:

- Have lived in the Borough for a long time but not aware that there are 12 scheduled ancient monuments. Improve awareness of heritage assets.
- East Quarry, Appley Bridge could be protected as a Site of Significant Scientific Interest (not relevant to the question and topic area).

Borough, Parish, Town Councillors / Community Groups:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Simonswood Parish has a Grade 2 Listed Building, two areas of historical interest being the remainder of Simonswood Forrest containing several protected tree species.
- The rural nature of the Borough has heritage value that should be protected. Continued development will harm rural heritage.

### HC04 - COMMUNITY FACILITIES

A total of 17 respondents made comments in relation to HC04 - Community Facilities.

#### **Questions:**

#### **47. What would you say are the main issues relating to community facilities?**

10 respondents answered this question.

#### Residents and members of the public:

- Not a lot of community facilities in many of the villages.
- Where there has been an increase of housing there has not been an increase in facilities.
- Some areas have few facilities and facilities in small villages should be preserved.
- Digmoor and West Bank Sports Facilities in Skelmersdale should be replaced and stop the decline of the golf course on the Beacon.
- All facilities should take environmental issues into account. Free or low-cost amenities for teenagers and the elderly.
- Add or move existing bus stops to new developments instead of trying to put new developments near to existing stops.

#### Borough, Parish, Town Councillors / Community Groups:

- The range and capacity of services has not increased in line with housing growth over the last 10 years. Developers do not agree to provide community facilities on time and try and use viability to get out of paying CIL and affordable housing obligations.
- Community facilities are limited in Bickerstaffe.

#### Organisations, including developers, landowners and representatives:

Emery Planning on behalf of Redrow Homes and Wainhomes North West

- Do not object in principle, the plan should consider ways in which the distribution of development can support, and ultimately safeguard, existing service provision across the Borough.

#### Statutory consultees and other organisations:

Theatres Trust

- The policy should also protect theatres; alternative development proposals on community facilities need to demonstrate lack of need and not just lack of viability.

#### **48. Which of the options do you most closely support?**

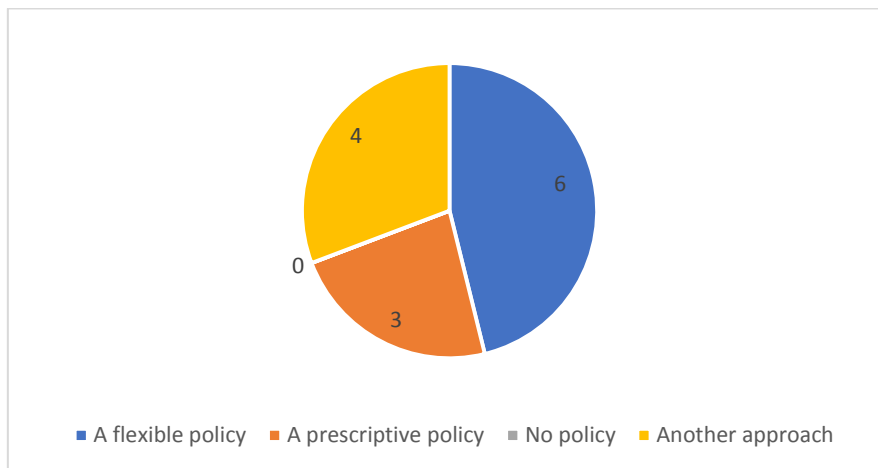
- **A flexible policy**
- **A prescriptive policy**

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- **No policy**
- **Another approach**

A total of 13 respondents answered this question. 6 or 46% supported 'a flexible policy'.



#### Residents and members of the public:

- Some areas have small, successful primary schools but need more houses to boost pupil numbers.
- Health and retail facilities are needed in many villages. Public transport needs to be improved.
- Calculate how many people there are against doctor, dentist or school capacity before new housing is granted. Any other facilities should be based on traffic impact; if road infrastructure is not good enough and alternative roads are not built, don't provide facilities.
- 

#### Borough, Parish, Town Councillors / Community Groups:

- Have a policy that says where facilities are needed but also be responsive to need. Allow facilities to be provided or enhanced in locations that have smaller scale development due to their status in the settlement hierarchy.
- The hands-off, flexible approach to provision does not work. The alternative approaches are not reasonable. Have a policy that says where facilities are needed but also be responsive to need. Allow facilities to be provided or enhanced in locations that have smaller scale development due to their status in the settlement hierarchy.
- Preferred approach is not ideal. It acknowledges that this provides the Council with less control and ability to reduce inequalities but is still presented as the preferred approach. The hands off, flexible approach does not deliver the facilities needed; the market has no incentive to provide facilities. The alternative approaches are not reasonable. A settlement hierarchy still means that services are overloaded, and community facilities in rural areas are lost; made worse by the fact that they have poor public transport connectivity.
- Doctors, dentists, hospitals, schools, public transport, and shops all need to be considered before a housing development becomes a community.

#### Organisations, including developers, landowners and representatives:

Pegasus Group on behalf of Bloor Homes

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Support the preferred approach.
- Requires further information on what is an "unnecessary loss"; development can sometimes lead to improved facilities.

Pegasus Group on behalf of Rowland Homes

- Support the preferred approach. Requires further information on what is an "unnecessary loss"; development can sometimes lead to improved facilities.

Pegasus Group on behalf of Story Homes

- Each policy affects viability; take a pragmatic approach to delivery of new housing and assess each application on its own merits. This is relevant for latter stages of large development sites, such as Yew Tree Farm.

#### Statutory consultees and other organisations:

Theatres Trust

- Refined model of the flexible approach. Allow facilities to come forward where appropriate or needed but presumption against loss of existing facilities unless criteria are addressed.

**49. Is there anything in our policy approaches that you particularly support (or disagree with)? Do you think this approach does enough to provide, or protect, community services? Why / why not?**

5 respondents answered this question.

#### Residents and members of the public:

- The approach should be decided by the locals in each of their own wards and they should be able to vote on changes.
- No, it doesn't do enough at present.

#### Borough, Parish, Town Councillors / Community Groups:

- None of the policy approaches proposed does enough to protect community services, both in the vicinity of development and in the wider impact development has across the Borough.
- No, but more needs to be done to provide efficient, usable public transport.

#### Organisations, including developers, landowners and representatives:

Emery Planning on behalf of Wain Estates Limited

- The Council should assess the need for community facilities across different parts of the borough. The plan should also consider ways in which the distribution of development can support, and ultimately safeguard, existing service provision, particularly in the rural areas.

**50. Do you have any other comments on this topic?**

4 respondents answered this question.

#### Residents and members of the public:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Sites for new schools should be in this policy. Secondary school education should be provided in Skelmersdale at the West Bank / Glenburn site. Questions whether there are sufficient primary schools in north Skelmersdale.

#### Statutory consultees and other organisations:

##### Trans Pennine Trail national office

- Have accessible facilities, able to be accessed by sustainable transport modes including bicycle parking.

##### Sport England

- A community facilities policy should include reference to sport and leisure facilities; need should be assessed against a Playing Pitch Strategy and Built Facilities Strategy and the NPPF.
- A new Playing Pitch Assessment should be undertaken. If any proposed development site involves direct loss of a playing field / sports facility, or prejudices the use of, then the site is unsuitable for development unless NPPF requirements are met.
- Assessment of Suitability section of Site Assessments should include such considerations; and the proximity to informal and formal provision and their potential enhancement should be a key indicator in site assessments.
- Provides commentary on a range of assessed sites. Additional need generated by new development should be met: on-site on large sites, taking into account existing facilities in the area.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### 9. Economy and Employment Policies

##### EE01 - PROVIDING AND MANAGING EMPLOYMENT AREAS

A total of 42 respondents made comments in relation to EE01 – Providing and Managing Employment Areas.

###### Questions:

**1. Which of the above approaches is your preference in relation to providing and managing employment areas? (please tick)**

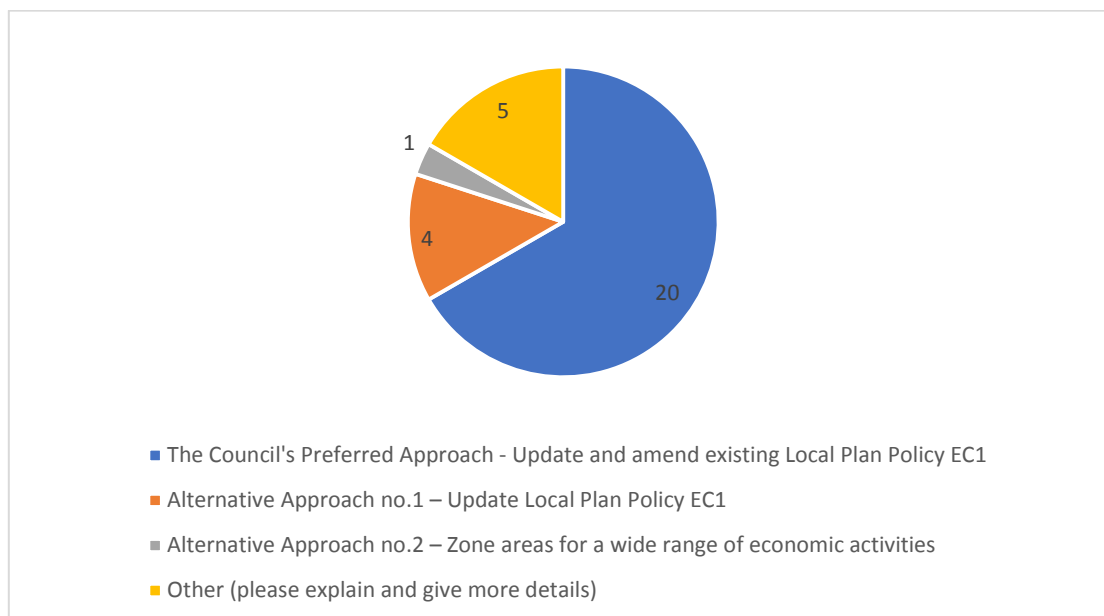
**a. The Council's Preferred Approach - Update and amend existing Local Plan Policy EC1**

**b. Alternative Approach no.1 – Update Local Plan Policy EC1**

**c. Alternative Approach no.2 – Zone areas for a wide range of economic activities**

**d. Other (please explain and give more details)**

A total of 30 respondents answered this question. 20 or 67% selected Council's preferred approach, followed by 4 or 13% preferred Alternative 1.



**2. Is there anything in our preferred approach that you particularly support (or disagree with)?**

14 respondents answered this question.

###### Residents and members of the public:

- (High quality) agricultural land should not be lost (including for Liverpool's needs).
- No large scale warehousing in the Green Belt.
- Use under occupied employment areas and buildings.

###### Borough, Parish, Town Councillors / Community Groups:

- Local shops are important for elderly who may not be able to travel far.

## West Lancashire Local Plan 2023-2040

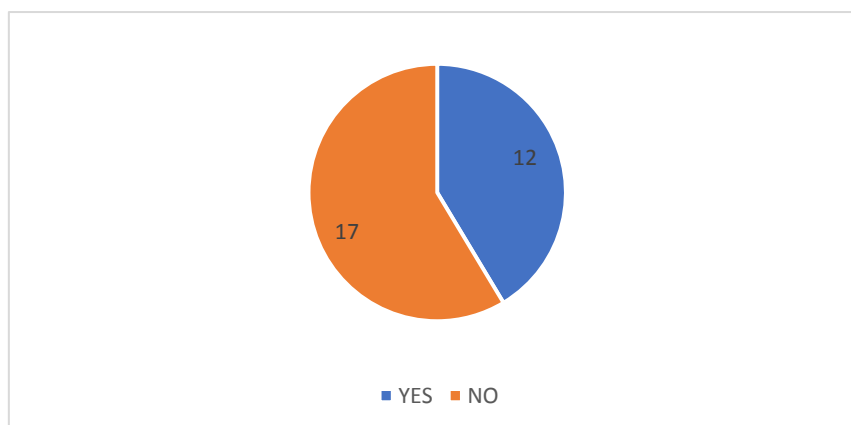
### Scope, Issues & Options Feedback Report

- Preferred approach would allow more shops in employment areas. Focus retail in designated centres.
- Without detail of existing Local Plan Policy EC1, there is insufficient detail to make a valued assessment of either the preferred approach or the alternatives.
- Little to differentiate the Preferred Approach from Alternative Approach 1 so no clear preference for either approach.
- Merit in defining the 3 types of employment sites.
- Land should not be allocated for the benefit of Liverpool City Region.
- M58 Junction 4 should be the preferred employment location.
- Would not wish to see development of large-scale B8 warehousing in West Lancs

#### Organisations, including developers, landowners and representatives:

- Identify new land for employment growth, especially at Skelmersdale and accessible to the M58.
  - Take account of (new) Class E and the broader definition of 'employment uses. Opportunities for mixed and ancillary uses e.g. hotels.
  - Difficult to comment at this stage without an understanding of WLBC's growth ambitions.
  - West Lancashire is well located to deliver significant new employment (logistics).
  - Rotherham's Green (site) is a major opportunity for environmentally responsible employment uses.
  - Employment land allocations should deliver strong growth to attract investment, support the 'levelling-up' agenda, and local inequality in access to jobs.
3. Should existing employment areas no longer be protected for predominantly employment uses (offices, light industry, research and development, general industry, warehousing and closely related employment uses) by allowing a wider range of uses? Y / N

29 respondents answered this question, small preference in favour of 'No'. 17 (59%) said 'No', 12 said 'Yes'.

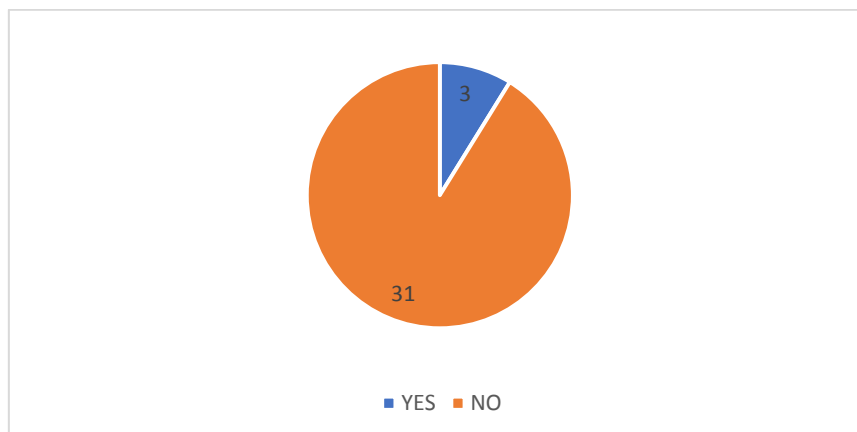


4. **Do you think that new land should be allocated in West Lancashire to meet the employment needs of the Liverpool City Region such as strategic needs for logistics (distribution and warehousing) uses. Y/ N**

34 respondents answered this question. A large majority in favour of 'No' (31 or 91%).

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report



5. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

34 respondents answered this question.

#### Residents and members of the public:

- Do not support using land in West Lancashire for Liverpool City Region needs.
- West Lancashire is primarily Grade 1 agricultural land / national importance needed for food production. Rural economy should be championed.
- Green Belt needs protecting.
- Improvements are needed at both ends of the M58.
- Distribution and warehousing provide limited employment opportunities.
- Opportunities for a green economy. Warehousing should locate near to M58/ M6.
- Loss of employment land to residential.

#### Borough, Parish, Town Councillors / Community Groups:

- No need to allocate land for the Liverpool City Region.
- Allocate brownfield land away from homes.
- Using land in West Lancashire for Liverpool City Region (LCR) needs is not evidenced and would undermine their regeneration as well as environmental and climate change goals.
- Defining 3 types of employment sites has merit and will help how they are managed.

#### Organisations, including developers, landowners and representatives:

- The agri-food sector is importance of in the Northern Parishes.
- Historic under-supply of employment land at Tarleton.
- If business needs aren't met inward investment will be lost.
- West Lancashire should meet strategic employment land needs for the wider LCR.
- Planning for needs must be in place rather than leaving to market forces.

#### Statutory consultees and other organisations:

- Sport is a large employer. Traditional forms of employment have changed so indoor sports uses; fitness clubs etc should be acceptable on employment sites.
- New employment sites should include pedestrian and cycle accessibility.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Transport impacts of allocations on the Strategic Road Network need to be assessed.
- Relaxing uses in employment areas risks impacting on amenity of existing uses.
- The role of the rural economy should be championed.
- Grade 1 agricultural land is a national asset and shouldn't be developed.
- The area should not provide employment land that could be provided for sustainably e.g. in the LCR.

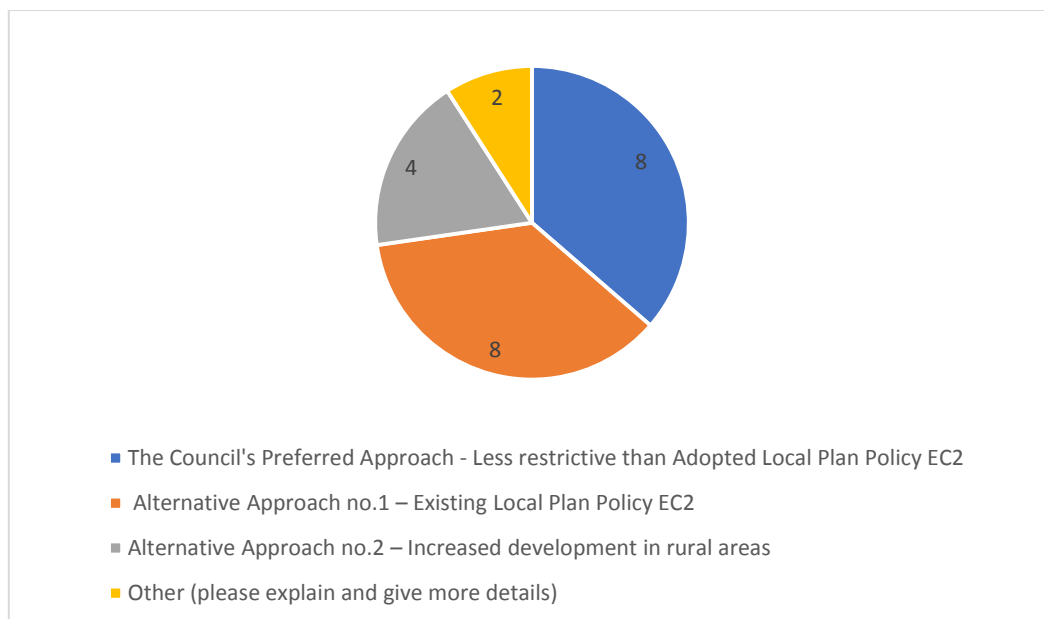
### EE02 - DEVELOPING THE RURAL AND VISITOR ECONOMY

A total of 27 respondents made comments in relation to EE02 - Developing the Rural And Visitor Economy.

#### Questions:

6. Which of the above approaches is your preference in relation to developing the rural and visitor economy? (please tick)
- a. The Council's Preferred Approach - Less restrictive than Adopted Local Plan Policy EC2
  - b. Alternative Approach no.1 – Existing Local Plan Policy EC2
  - c. Alternative Approach no.2 – Increased development in rural areas
  - d. Other (please explain and give more details)

22 respondents answered this question, with equal support for 'Council's preferred approach' and 'Alternative no.1' (8 or 36%) and followed by the 'Alternative no.2' (4 or 18%).



7. Is there anything in our preferred approach that you particularly support (or disagree with)?

7 respondents answered this question.

#### Residents and members of the public:

- Support the protection of agricultural land. Contributes to national self sufficiency.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

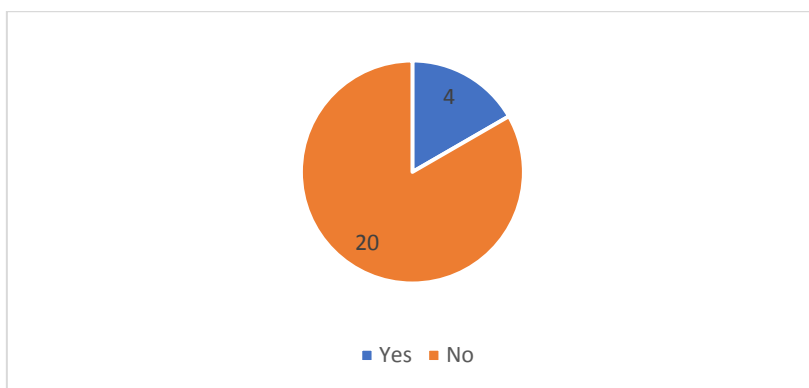
- Use land for local food production.
- Protect existing rural employment sites and re-use existing vacant buildings.
- Current policy (Alternative no 1) has worked. Allowing more business will lead to more traffic issues on rural roads that are not built to cope.

#### Borough, Parish, Town Councillors / Community Groups:

- No suitable land for business use at Parbold.
- No details of what 'proportionate scale' is
- Does not address infrastructure constraints that may affect rural economic growth
- Recognise the value of the agricultural sector, in terms of employment, strategic food supply and economic contribution.
- Council's Preferred Approach offers greater flexibility than the Alternative Approaches.

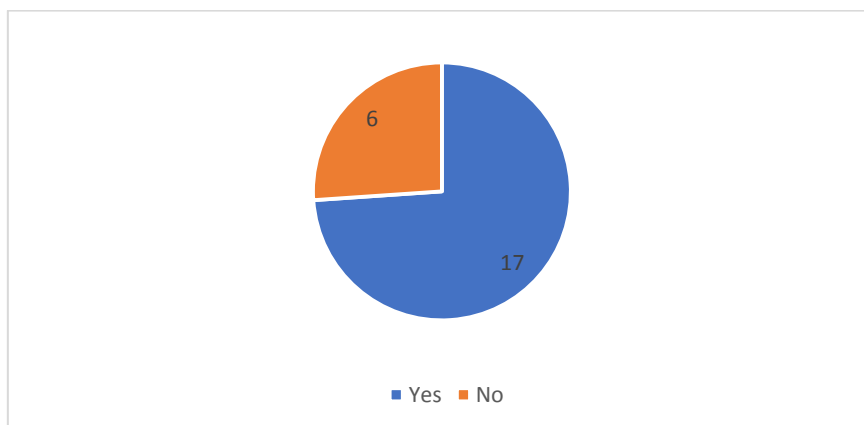
8. **Should there be specific land allocation for employment uses in rural areas, for example for the provision of a central rural horticultural distribution centre or for offices of an appropriate scale? Y / N**

24 respondents answered this question. Most respondents selected 'No' (20 or 83%).



9. **Should the provision of visitor and tourist facilities, including attractions and accommodation, be promoted in rural areas provided that the distinctive character of the West Lancashire countryside is protected? Y / N**

23 respondents answered this question. Most selected 'Yes' (17 or 74%)



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### 10. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

13 respondents answered this question.

#### Residents and members of the public:

- Need to preserve food security. The Borough's agricultural land is some of the most productive in the UK and is a national resource.
- Rural employment land should be used to support agriculture.
- Much of the best agricultural land is at risk of flooding. Restrict development to avoid it being made unusable as a result of climate change.
- West Lancs is a good base for visitors as it has beautiful rural areas and is close to the coast.
- Rural nature of large areas of the Borough is what gives it its landscape character and it is vital that this is protected.

#### Borough, Parish, Town Councillors / Community Groups:

- Flooding in Parbold, which the LLFA need to address.
- Preserve Simonswood Parish by keeping the area rural.
- Links to other policies such as biodiversity net gain; flooding, intentional re-wetting; reforestation; health & wellbeing, decarbonisation, habitat protection; renewables.
- No details of what 'proportionate scale' is.
- Does not address infrastructure constraints that may affect rural economic growth.
- Significance of the rural economy and agricultural sector in employment / economy and its strategic food supply.
- Beauty of rural areas is a major attraction for visitors.

#### Organisations, including developers, landowners and representatives:

- Horticultural distribution centres can be used for import of produce to repackage and distribute across NW England.
- Support for a wider definition of employment uses beyond traditional and creation of specific rural development site allocation(s).

#### Statutory consultees and other organisations:

- Drainage of Alt Crossens moss lands has created very low land levels. A policy developing the rural & visitor economy must reflect the need for positive adaptations that address environmental issues.

## EE03 - ADAPTING OUR TOWN AND LOCAL CENTRES

A total of 18 respondents made comments in relation to EE03 - Adapting our Town and Local Centres.

#### **Questions:**

#### **11. Which of the above approaches is your preference in relation to adapting our town and local centres? (please tick)**

***a. The Council's Preferred Approach - One overarching policy for centres, with additional supporting policies for Burscough, Ormskirk and Skelmersdale town centre. An additional separate healthy eating and drinking policy***

Scope, Issues & Options Feedback Report

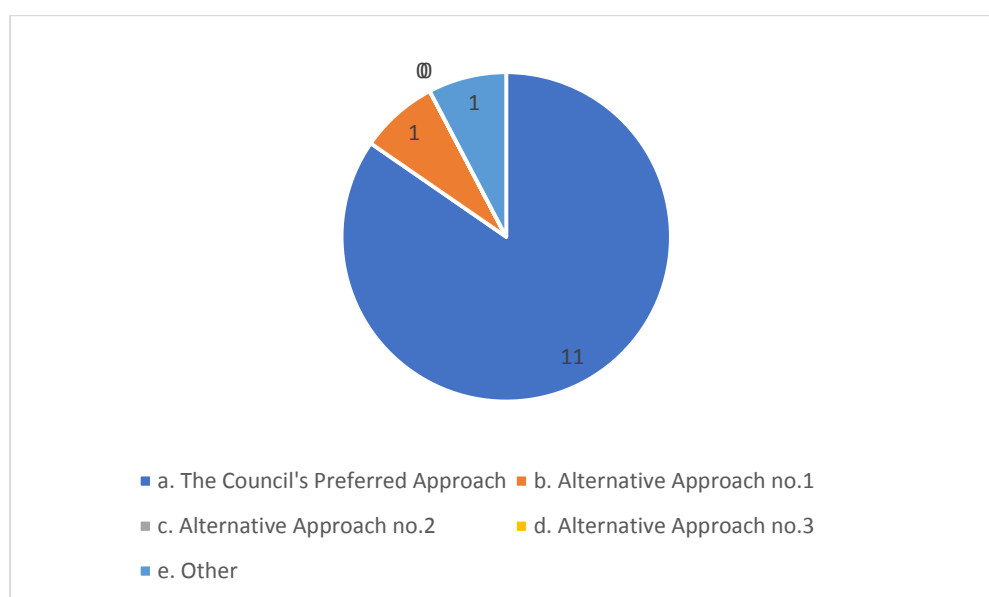
**b. Alternative Approach no.1 – Minimal changes to existing Local Plan Policy IF1**

**c. Alternative Approach no.2 – One single general policy in relation to centres and appropriate uses with no additional and separate policies for Burscough, Ormskirk, and Skelmersdale town centres**

**d. Alternative Approach no.3 - One overarching policy in relation to centres and appropriate uses, including healthy eating and drinking considerations, with additional supporting policies for Burscough, Ormskirk and Skelmersdale town centre.**

**e. Other (please explain and give more details)**

A total of 13 respondents answered this question. 11 or 85% selected the Council's preferred approach and 1 or 8% selected 'alternative approach no.1'.



**12. Is there anything in our preferred approach that you particularly support (or disagree with)?**

7 respondents answered this question.

Residents and members of the public:

- Need to find a way to make town centres attractive places to visit by having speciality shops/events.
- Out of town and online retail have finished town centre shops. It's a bit late trying to improve town centres.
- No more students / flats accommodation.

Borough, Parish, Town Councillors / Community Groups:

- Aging population need local shops.
- Significant social and economic change and impacts from pandemic and out of centre retail. Destinations outside West Lancs offer greater choice. Longer-term town centre strategies to broaden appeal as a social destination and not just a retail centre.
- Agreed that Burscough, Ormskirk and Skelmersdale warrant individual policies.

Scope, Issues & Options Feedback Report

- Inappropriate for a single focus on Skelmersdale.
- Proposals to abolish the 70% retail use threshold (in Ormskirk) are not detailed so difficult to assess the effects.

**13. Are there any particular issues in relation to Burscough, Ormskirk and Skelmersdale town centres that need to be addressed by policy? (please describe the matter and relate it to a particular centre)**

A total of 5 respondents answered this question.

Residents and members of the public:

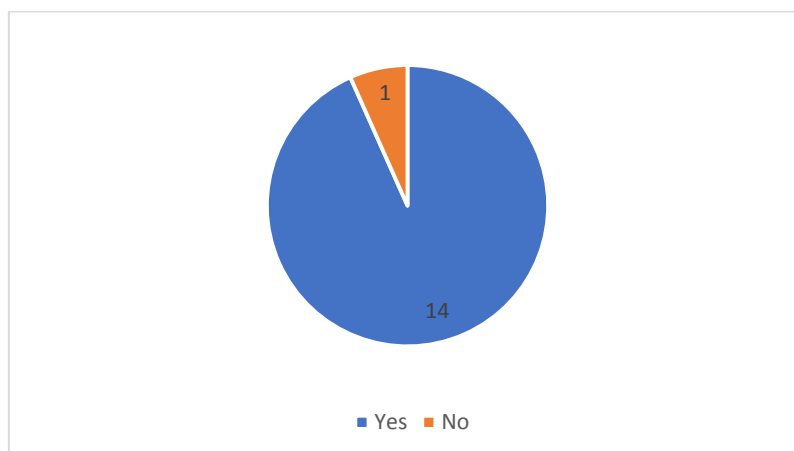
- Level-up WLBC financially and prioritise. Focus on large population centres and before the parish locations of low population/high wealth.
- Too many bars in Ormskirk that don't contribute to the street scene. No longer a shopping destination.
- A greater range of retail outlets should be encouraged in Ormskirk as opposed bars and fast food shops.
- More town centre flats for the elderly.

Borough, Parish, Town Councillors / Community Groups:

- Burscough is blighted by traffic on the A59 through the heart of the town. Retail offer pushed into out of town locations. A masterplan for the town needs to look regeneration of the centre and upgraded infrastructure.
- Skelmersdale regeneration must continue with careful consideration of impacts on the Concourse Centre.
- Ormskirk is becoming a student focussed service centre and losing traditional appeal as a historic market town and shopping destination, Have to decide whether a student led economy is sufficient to a vibrant town centre.

**14. Should uses permitted West Lancashire's centres be widened to allow more non-retail activities provided that street frontages remain in active use? Y / N**

15 respondents answered this question. Nearly all answered 'Yes' (14) and 1 'No'.



**15. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?**

11 respondents answered this question.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Residents and members of the public:

- Each area has its own focus / value: Ormskirk has the Market, Burscough the Canal and walks, Skelmersdale could have Tawd Valley.
- Provide space above shops for offices not students.
- Regenerate Ormskirk as well as Skelmersdale town centre.

#### Borough, Parish, Town Councillors / Community Groups:

- Too much student accommodation. Doesn't make a vibrant town centre.
- An overarching policy with strategies for Ormskirk, Burscough and Skelmersdale town centres is supported. Need to be evidenced and realised with timeframe of the Local Plan.
- Significant social and economic change and impacts from pandemic. Long term new town centre strategy needed.
- Proposals to abolish the 70% retail use threshold (in Ormskirk) are not detailed so difficult to assess the effects.
- If our centres cannot service the growing resident population the local economy will suffer. Out of town schemes and destinations outside West Lancs offer greater choice.
- Focussing regeneration on Skelmersdale Town Centre is supported and should take account of Skelmersdale Town Centre Regeneration Framework and Masterplan.

#### Statutory consultees and other organisations:

- Town centre need investment in LTN1/20 compliant cycle infrastructure, accessible seating, clear signage, cycle storage.
- Policies should promote rather than restrict the range of uses a centre can accommodate. Sports and leisure or uses that promote activity such as gyms, can broaden appeal and increase viability and vitality.

## EE04 - SKILLS AND EDUCATION

A total of 36 respondents made comments in relation to EE04 – Skills and Education.

### **Questions:**

#### **Your Views approach A: Edge Hill University Campus**

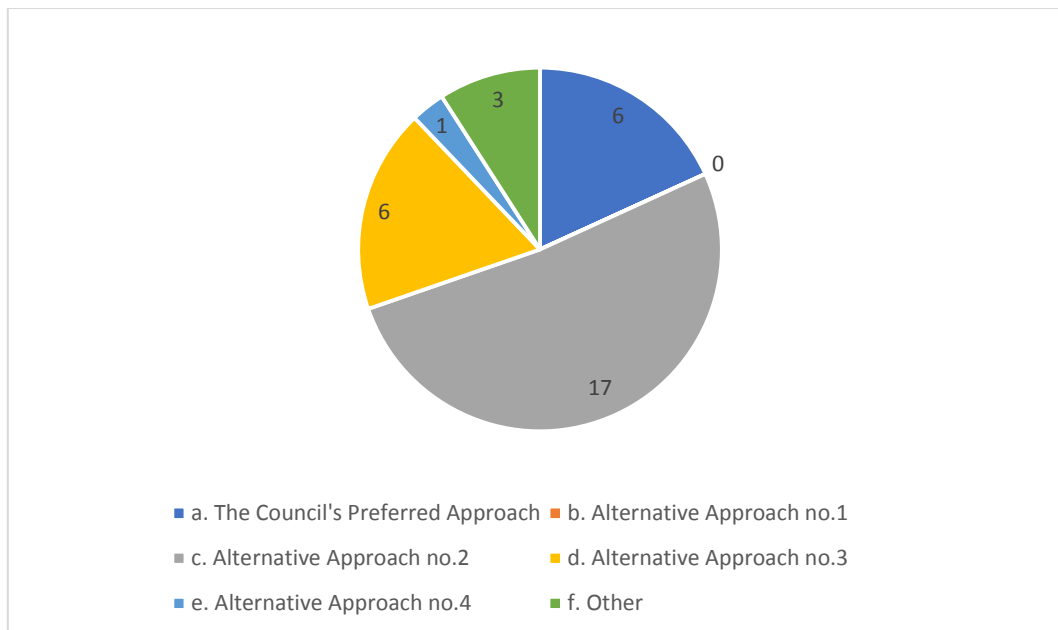
**16. Which of the above approaches is your preference in relation to Edge Hill University Campus? (please tick)**

- a. The Council's Preferred Approach – A policy for the future development of Edge Hill University campus***
- b. Alternative Approach no.1 – To not have any policy for the University campus***
- c. Alternative Approach no.2 – A more detailed policy or masterplan for the University campus***
- d. Alternative Approach no.3 - A different location for the expansion of the University campus***
- e. Alternative Approach no.4 - A policy to deal with the future of Edge Hill University and selected other education sites***
- f. Other (please explain and give more details)***

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

33 respondents answered this question. Most respondents selected “Alternative Approach no.2” (17 or 52%).



#### 17. Is there anything in our preferred approach that you particularly support (or disagree with)?

18 respondents answered this question.

##### Residents and members of the public:

- Edge Hill should expand at Skelmersdale.
- Need more efficient traffic controls and provision of parking on campus to reduce town centre and wider congestion.
- Several views that the existing campus is surrounded by good agricultural land (Green Belt) and must not spread further.
- Disagree with campus expansion onto greenfield sites on St Helens Rd. EHU 2021-2023 Strategic plan has no proposals for campus expansion.
- Previous expansion ignored biological and environmental concerns.
- Lack of environmental concerns in any of the proposed preferred options, no grasp of climate change.
- A masterplan could redevelop old halls of residence and car parking more efficiently (modernise, increase storeys). Need to engage with Ormskirk residents.
- Student accommodation should not impact Ormskirk residents. Strain on town, lack of affordable family housing and anti-social behaviour.
- The preferred approach is expansion in the immediate area at any cost. There has already been a large increase in traffic on St Helens Rd., illegal parking, a huge surge of HMO's in Ormskirk.

##### Borough, Parish, Town Councillors / Community Groups:

- The scope of the two approaches focussed on Edge Hill University campus and the employment and up-skilling of local people appears limited.
- Need to address the re-training requirements for an ageing population to work beyond the retirement age.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- The need for expansion on campus accommodation is questionable. HMO numbers in Ormskirk and on-site rooms have grown significantly in recent years. There is capacity to accommodate the need for live-in student numbers into the 2030s.
- A better option would be a more distributed campus, strategically positioned in locations within Skelmersdale and/or Burscough.
- Ormskirk under strain due to amount of students living on campus and within the town.

#### 18. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

18 respondents answered this question.

#### Residents and members of the public:

- Need a park and ride facility e.g. just off M58.
- Need to provide secondary education on the former West Bank and Glenburn site in Skelmersdale to encourage active travel.
- While expansion of higher education over the next decade might be anticipated given the projected increase in 18 year olds other factors may offset this such as the decline in EU students, reduced Government expenditure to support Higher Education. Need to recognise factors which may constrain as well as support future growth.
- Not clear how much WLBC can influence development at Edge Hill.
- A different site other than Ormskirk should be given serious consideration and would benefit other areas.
- There should be a cap on the number of HMOs allowed.
- Using space taken up for car parking on site would allow further expansion of EHU within the existing site.

#### Borough, Parish, Town Councillors / Community Groups:

- The scope of the policy is too limited and fails to address the wider skills needs across the Borough NB response did not relate to the topic (Edge Hill).
- Limited scope to the two approaches, focussed on Edge Hill University campus and the employment and up-skilling of local people to support construction. This fails to address re-training an ageing population as people work retirement age of 65.
- Expansion of the existing campus has had negative impacts. Further expansion in its current location is not supported as benefits do not outweigh these.
- The need for expansion on campus accommodation is questionable. HMO numbers in Ormskirk and on-site rooms have grown significantly in recent years. There is capacity to accommodate the need for live-in student numbers into the 2030s.
- A better option would be a more distributed campus, strategically positioned in locations within Skelmersdale and/or Burscough. A masterplan approach for the existing campus also has benefits.

#### Organisations, including developers, landowners and representatives:

- A dedicated policy covering EHU and the Ormskirk campus specifically is supported. It needs to be flexible so the University can respond to rapid change
- EHU strongly supports acceptance of expansion to meet future development needs. This will not be through any satellite campus which would not be considered.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Preference for expansion on land to the south of St Helens Road. Existing forecasting undertaken by EHU indicates campus expansion across St Helens Road is required after 2030.
- EHU are currently updating evidence (Estates Strategy and Economic and Social Contribution Report) and will work with the Council in updating development needs
- The existing Green Belt boundary is tightly drawn around the campus and needs review. It should be expanded to Scarth Hill Lane.

#### Statutory consultees and other organisations:

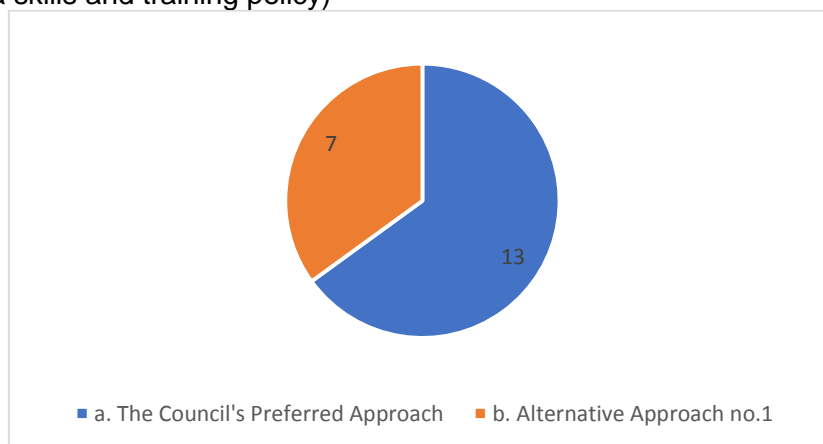
- Difficult to comment without knowing specific details of any potential University expansion. UU preference for any expansion to be guided by good design supported by a masterplan.

### Your Views approach B: Skills and Training

#### 19. Which of the above approaches is your preference in relation to skills and training? (please tick)

- a. The Council's Preferred Approach – A skills and training policy
- b. Alternative Approach no.1 – Not to have a skills and training policy

20 respondents answered this question. Majority supported for the Council's preferred approach (A skills and training policy) (13 or 65%) and 7 favouring Alternative approach no.1 (Not to have a skills and training policy)



#### 20. Is there anything in our preferred approach that you particularly support (or disagree with)?

10 respondents answered this question.

#### Residents and members of the public:

- Some respondents misunderstood the policy approach, believing it to only relate to Edge Hill University and associated Green Belt development.
- Demographically, there is likely to be a growing need for retraining, upskilling and higher education.
- A Main Contractor for major developments will sub-let work packages to specialised sub-contractors with little control to implement the intended benefits of the policy.

#### Borough, Parish, Town Councillors / Community Groups:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- The Preferred Approach deals and is too narrow in its scope for skills, and hence is not supported. Alternative Approach 1 is also insufficient.
- Promoting the employment of local people and use of local businesses is laudable, however the proposed policy is too narrow in its focus on construction / skill and is too reliant on implementation of large-scale development proposals. Scope, relevance and delivery needs reviewing. Respondee (2) put forward no alternative.
- There is no accommodation for the newly skilled as students have already taken affordable housing.

#### 21. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

10 respondents answered this question.

#### Residents and members of the public:

- Need training for jobs that are environmentally friendly.
- Expand Edge Hill into Skelmersdale to ease pressure on Ormskirk.
- How will the existing infrastructure cope with the increase in traffic under the "preferred option"?

#### Borough, Parish, Town Councillors / Community Groups:

- Promoting the employment of local people and use of local businesses is supported, however the proposed policy is too narrow in its focus on construction / skill and is too reliant on implementation of large-scale development proposals. Scope, relevance and delivery needs reviewing.
- Proposals to expand into the Green Belt to the south of St Helens Road were abandoned in 2018/19. EHU's 2021-2025 Strategic Plan does not propose any campus expansion. Suggest 2 alternatives: i) detailed strategic/master plan from the University; ii) a different location for any future (split site).

#### Organisations, including developers, landowners and representatives:

- (Richborough) fully supports the growth of Edge Hill University and its campus. Land to the south of St Helens Road has significant potential. (student accommodation and knowledge-led business space).
- Wider affordable and market housing development is essential in underpinning growth.
- Approach must be consistent across the Local Plan, including Policy HC01g (Student Accommodation).

#### Statutory consultees and other organisations:

- Sport England wish to work with the Council and Edge Hill University campus on developing sporting and recreation facilities. Any policy should take account of the 'Active Design' principles.
- Lancashire County Council education comments in relation to school place provision which do not relate to the policy approaches under skills and training, instead relating to developer contributions.
- Refers to Lancashire School Place Provision Strategy 2022 – 2025 and Education Contribution Methodology (assessing the likely impact of new housing developments on school places) and circumstances when planning obligations are sought.

## 10. Environment and Health Policies

### EH01 – NATURE

A total of 29 respondents made comments in relation to EH01 - Nature.

#### Questions:

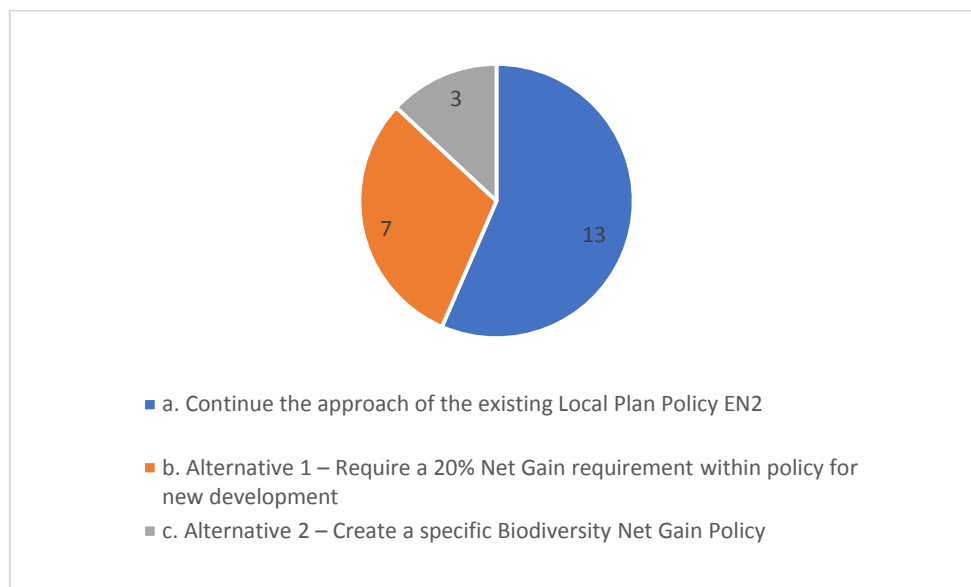
1. Which of the previously detailed approaches is your preference in relation to the Boroughs Nature?

*a. Continue the approach of the existing Local Plan Policy EN2: Preserving and Enhancing West Lancashire's Natural Environment, including parts 1 (Nature Conservation Site and Ecological Networks and 2 (Priority Species and Habitats).*

*b. Alternative 1 – Require a 20% Net Gain requirement within policy for new development*

*c. Alternative 2 – Create a specific Biodiversity Net Gain Policy*

A total of 23 respondents answered this question. 13 or 57% favoured continue the approach of existing policy, followed by 7 or 30% favoured Alternative 1.



2. What would you say are the main issues relating to nature in West Lancashire?

13 respondents answered this question.

Residents and members of the public:

- Potential to build on green spaces would affect wildlife.
- Improve public transport to reduce impact of car travel on the environment.
- Protect green belt and woodland from development.
- Farmers in West Lancashire currently encourage wildlife to prosper with the provision of conservation areas, hedgerow planting, beetle banks and grass strips bordering all field boundaries. Any development will reduce these natural habitats.
- There are grants available for farmers to put back hedges and trees.
- Flood risk and green belt development.
- Overuse of some sites such as Fairy Glen and consequent damage to wildlife.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Recognise the contribution made by farmed environment to nature and biodiversity.
- WLBC would not take any notice of objections to Edge Hill lighting proposals when put forward and as a consequence there are no owls remaining in Ruff Woods.

#### Borough, Parish, Town Councillors / Community Groups:

- Potential loss of peat moss in Simonswood and loss of protected species that used the moss.
- Preserve Simonswood Moss for all wildlife.
- Feeding grounds for migratory birds centred on Martin Mere go way beyond the 15-mile radius normally estimated and this may be as a consequence of large-scale development that has already taken place in the Burscough/Rufford area.
- Failure to protect and preserve areas of traditional peat bog.
- Loss of habitat and inadequate offset provision.
- Increasing light and noise pollution
- Reduced uptake of farming, stewardship scheme and hedgerow regeneration.
- Not wish to select an approach preferring our overall comments to be taken into account but the system made a selection mandatory.

#### Statutory consultees and other organisations:

##### Environment Agency

- The proposed plan should provide more reference to Local Nature Recovery Strategies.
- Significant improvements could be made to improve the biodiversity value of aquatic habitats.
- To make it clear that development proposals avoid and compensate for any impacts on the environment and provide a 10% net gain on the biodiversity value of the site.
- Mitigation for harm of development cannot be offset by BNG requirements.

#### **3. Do you agree with following the national minimum requirement for 10% Biodiversity Net Gain or should we go for a higher figure?**

17 respondents answered this question. 8 respondents preferred to follow the national minimum requirement for 10% Biodiversity Net Gain, 8 respondents preferred to go for a higher figure and 1 respondent have no idea of this question.

#### Residents and members of the public:

- Go for a higher figure if possible
- Go for a higher figure to increase net gains, improve quality of natural environment and contribute to reducing climate crisis.
- 10% is in line with the national planning policy
- Go for a higher figure and off-site contribution to be required if not possible within development site.
- It should be much higher.

#### Borough, Parish, Town Councillors / Community Groups:

- No idea.
- It is considered acceptable for the Council to only adopt the minimum level dictated by legislation, which may well prove to be more defensible under challenge. Reflecting on West Lancashire as a rural borough that has a wide variety of habitats

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

and animal and plant species, a higher percentage net gain should be an aspiration for the Borough. For a more ambitious target to be enforceable across all developments and to be deemed sound under challenge from developers, it is anticipated that a solid evidence base will be required.

- Disagree with the bare minimum of 10% and believe the aspiration should be higher.

#### Organisations, including developers, landowners and representatives:

##### Gladman

- Support the Council's preferred approach to follow national minimum requirement of 10% and the approach is consistent with national planning policy.
- Not support the application of 20% standard and this may affect the viability of development proposals and would likely result in sites which do not take into account the local character of the area and local site densities.

##### Savills UK Ltd on behalf of Harworth Plc.

- The Local Planning Authority should progress a policy which includes Biodiversity Net Gain but should certainly not seek to go beyond the 10% Biodiversity Net Gain figure that Central Government consider to be reasonably implementable.
- It is recommended that the policy on Biodiversity Net Gain sets out the intended charging mechanism and financial value to be attributed to each Biodiversity Unit, where this is to be delivered off-site.

##### Turley on behalf of David Wilson Homes

- Object to the requirement of 20% biodiversity net gain for new development as it would significant impact on the viability of development sites.
- There is no evidence at this stage to demonstrate that that a higher biodiversity net gain requirement than that in the draft Environment Bill is necessary in the Borough, nor has such requirement been viability tested.

##### Pegasus Group on behalf of Bloor Homes and Rowland Homes

- Support this approach, although would note that the 10% BNG requirement has yet to be enshrined in national planning policy, so would suggest that the policy omits a % amount until such time as this is confirmed.

##### Pegasus Group on behalf of Story Homes

- Support this approach, although would note that the 10% BNG requirement has yet to be enshrined in national planning policy, so would suggest that the policy omits a % amount until such time as this is confirmed
- Further flexibility in line with the NPPF (paragraph 180a) to allow off-site contributions, where on site provision is not possible.

#### Statutory consultees and other organisations:

##### United Utilities

- To progress with the same figure of 10% as specified in the now published Environment Act.

##### Environment Agency

- Support the adoption of higher local BNG requirements for all development or, where the evidence would not support this.
- Support higher local BNG requirements on specific types of site or in specific locations (e.g. greenfield sites, sites at risk of flooding, etc).

**4. Do you have any other comments on this topic?**

15 respondents answered this question.

Residents and members of the public:

- Take more seriously the preservation of mature native trees.
- Need to protect Bickerstaffe as it is a green buffer zone offering high biodiversity and also food production area on Grade 1 agricultural land.
- A policy of hedge row improvement and creation should be introduced.
- Tree planting should be encouraged within hedges to both enhance landscape and contribute to the Queens Jubilee tree planting targets.
- Land should be allocated round urban areas for planting of trees.
- To preserve and extend wild natural spaces everywhere and encourage individuals to do this in their own gardens. Local media outlets could be used for education and sharing ideas.
- Very concerned about flooding issues in Burscough which are apparently not being thoroughly or properly addressed, with the many bodies concerned not acting together to go anywhere near to solving the problems.

Borough, Parish, Town Councillors / Community Groups:

- To preserve the natural nature of our Parish at all costs both now and in the future by keeping the area as rural as possible.
- Policy ST03 proposed to be an overarching policy to address the climate emergency and that individual policies would be the appropriate location to include more specific details as to how each policy would support the climate change agenda.
- Policy EH01 includes little emphasis on related, climate emergency considerations.
- Considering West Lancashire is a rural borough, the 10% seems to be a minimalist response and higher percentage net gain should be an aspiration for the Borough.
- Efforts should be made to provide the necessary evidence that not only supports the rationale for a greater biodiversity net gain, but also provides a sound and unquestionable basis for such an increase that will ensure that this policy is enforceable across all future development.
- Need more effort in protecting the environment and need a holistic approach when think about new development, this has failed in Burscough in the current Plan.

Statutory consultees and other organisations:

Trans Pennine Trail

- Engagement with residents to highlight the huge local biodiversity to encourage learning in schools and formation of nature groups / volunteer groups.

United Utilities

- Currently reaching out local authorities to ensure a development of BNG strategy to support local biodiversity and nature recovery needs and would welcome opportunity to discuss the approach to the delivery of BNG.
- Emphasise the need for any local policy to acknowledge the importance of flexibility in the delivery of BNG.

Sport England

- Have no specific comment on Biodiversity Net Gain

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- However, the 're-wilding' of open spaces, planting of trees, etc should not have an adverse impact on the functionality of a playing field as this would in turn have an adverse impact on sport and recreation as well as on people's health and social wellbeing.
- There is also the opportunity for spaces designed to help address ball strike mitigation associated with a sports facility to also aid in promoting biodiversity enhancement.

#### CPRE, The Countryside Charity

- There has been a loss and reduction of a wide range of biodiversity and the local plan should seek to reverse this trend by ensuring land is used as responsibly as possible.
- Opposed to loss of designated Green Belt and other wildfowl lowland farmland.
- To achieve 10% BNG any mitigation and compensation is likely to be required on site or in proximity and should be discouraged off-site if appropriate.
- Green Infrastructure must be retained wherever possible
- Hope the new local plan will continue to protect and conserve existing hedgerow and promote new planting in new development.

#### 5. **Is there anything in our policy approaches that you particularly support / disagree with?**

3 respondents answered this question.

#### Residents and members of the public:

- Support for the protection of natural assets and protected habitats.
- Concerned about "replacement" of ecological networks as it is not clear whether this will be beneficial or retrograde.

#### Statutory consultees and other organisations:

##### Natural England

- Natural England welcomed the proposed policy approach.
- Policy EH01 should set out a clear strategy for the protection, restoration and enhancement of biodiversity.
- Functionally Linked Land (FLL) remains a key issue within West Lancashire
- To learn the outcome from BNG public consultation for further guidance on how BNG should be embedded in Local Plan.

## **EH02 – PRESERVING AND ENHANCING THE BOROUGH'S LANDSCAPE / LAND RESOURCES**

A total of 22 respondents made comments in relation to EH02 - Preserving & enhancing the Borough's landscape / land resources.

#### **Questions:**

6. **Which of the above approaches is your preference in relation to preserving and enhancing the Borough's landscape and resources? (please tick)**
  - a. **Continue the approach of existing Local Plan Policy EN2 Parts 4 (Land Resources), 5 (Coastal Zone) and 6 (Landscape Character)**

Scope, Issues & Options Feedback Report

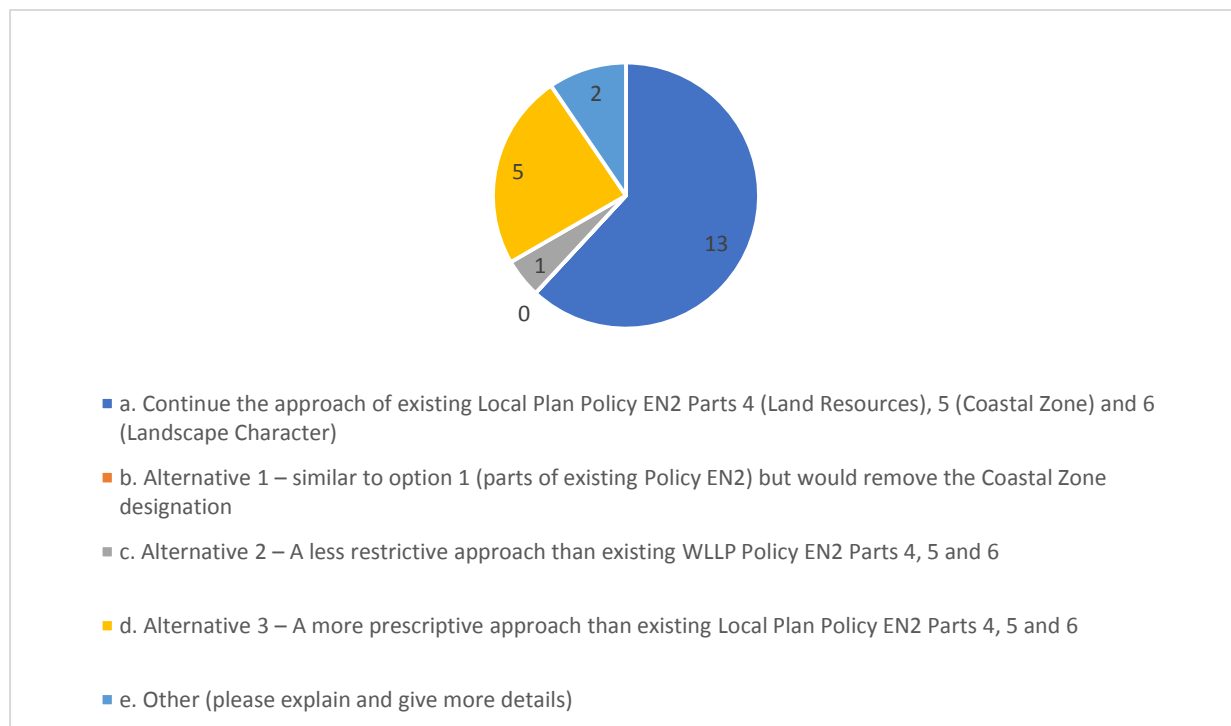
**b. Alternative 1 – similar to option 1 (parts of existing Policy EN2) but would remove the Coastal Zone designation**

**c. Alternative 2 – A less restrictive approach than existing WLLP Policy EN2 Parts 4, 5 and 6**

**d. Alternative 3 – A more prescriptive approach than existing Local Plan Policy EN2 Parts 4, 5 and 6**

**e. Other (please explain and give more details)**

A total of 21 respondents answered this question. 13 or 62% preferred continuing the approach of existing policy, followed by 5 or 24% preferred a more prescriptive approach.



**7. Is there anything in our preferred approach that you particularly support (or disagree with)?**

12 respondents answered this question.

Residents and members of the public:

- Need to maintain the availability of good agricultural land
- Support a restricted approach to new development taking place on good quality land and preferably no development taking place on quality agricultural land.
- Plant hedgerow in include trees (native deciduous) to surround and disguise developments especially in green belt.
- The best and most productive farm land must be safeguarded.
- Disagree with a less restrictive approach.

Borough, Parish, Town Councillors / Community Groups:

- Preserving and where possible, enhancing the landscape must be afforded great weight in the Local Plan.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Development should focus on delivering the minimum amount necessary to meet the immediate demands of West Lancashire and the evidence for this must be sound and current.
- The Policy need recognises the importance of the best most versatile agricultural land and protection for this is strongly supported.

#### Organisations, including developers, landowners and representatives:

##### Gladman

- Gladman support the continuation of the existing Local Plan approach.
- Flexibility should be used with regards to new development taking place on BMV agricultural land.

##### Pegasus Group on behalf of Bloor Homes, Rowland Homes and Story Homes

- Support the preferred approach.

##### WSP on behalf of Seddon Homes Ltd.

- Seddon would not support a policy that would protect all best and most versatile agricultural land.
- There are also parcels of land which may be classes as Grade 2 and Grade 3 and whilst may be suitable for some agricultural use, would make sustainable residential development sites.
- Site (Carr Lane, Tarleton) is a logical residential development parcel. Need to provide additional housing in Tarleton outweighs the protection of this Grade 3b agricultural land.

#### Statutory consultees and other organisations:

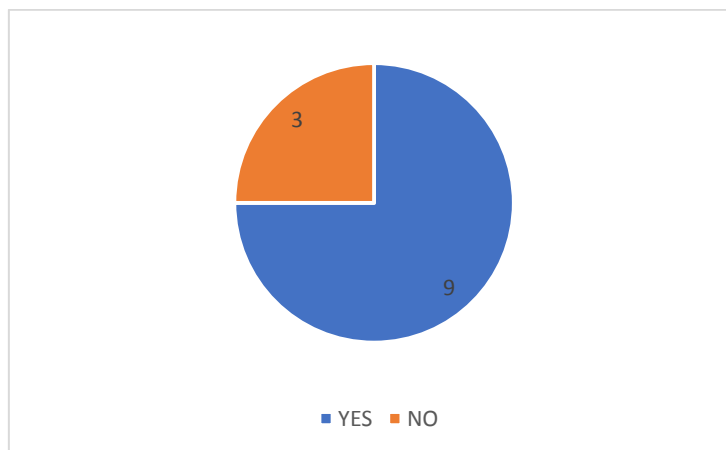
##### Environment Agency

- Support a more prescriptive approach than existing Local Plan.
- Not support the removal of coastal change areas from the policy to ensure compliance with NPPF policy 170 and 171.
- Peat should ideally be referenced specifically.
- Strengthen policy on encouraging opportunities for more sustainable practices, including rewetting of peat and wetter farming.

8. **Should development on greenfield sites on the edge of and outside existing settlements only take place where the landscape and land resource are less sensitive to change? Y / N**

12 respondents answered this question. 75% respondents selected 'Yes' and 25% selected 'No'.

Scope, Issues & Options Feedback Report



9. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

10 respondents answered this question.

Residents and members of the public:

- Expensive properties on greenfield land are not good for senior citizens.
- Brownfield sites should be developed in preference to greenfield ones.
- Greenfield sites should be preserved as a priority
- This policy has already caused measurable harm to existing wildlife, through policies of poor desktop surveys and plans and a real lack of knowledge of many areas across the Borough.
- Green belt needs strict protection
- Developments on the edge of and outside existing settlements should not be allowed and distinction between settlements should be maintained.
- It is necessary to 'nibble' into green belt for small developments in small fields.

Borough, Parish, Town Councillors / Community Groups:

- Capacity and maintenance of the water courses that pass across the Borough
- Retention of the pumping stations and ability to effectively manage the low land around Banks and Tarleton.
- Visual impact of large structures on the openness of the landscape.
- Opportunities for landscape resources that may achieve improved Carbon sequestration
- Intentional land wetting/wetland creation environmental schemes.

Organisations, including developers, landowners and representatives:

CBRE

- A less restrictive approach is appropriate as there are parcels of land in and adjacent to the village of Tarleton which play a limited role in preserving landscape character and which are less sensitive to change.
- Sites which have a limited physical and visual relationship with the wider expanses of open land around Tarleton, and where the sense of openness of land surrounding the village would not be affected by the site's development, should not be subject to Landscape Character designations, as it amounts to an unnecessary and unwarranted constraint on development.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Statutory consultees and other organisations:

##### Natural England

- Natural England welcome a continuation of the approach of existing Local Plan Policy
- Peat as an irreplaceable habitat which provides multiple benefits for both biodiversity and climate change mitigation.

### EH03 - FLOOD RISK AND WATER RESOURCES

A total of 28 respondents made comments in relation to EH03 - Flood Risk & Water Resources.

#### **Questions:**

#### **10. Which of the above approaches is your preference in relation to flood risk and water resources? (please tick)**

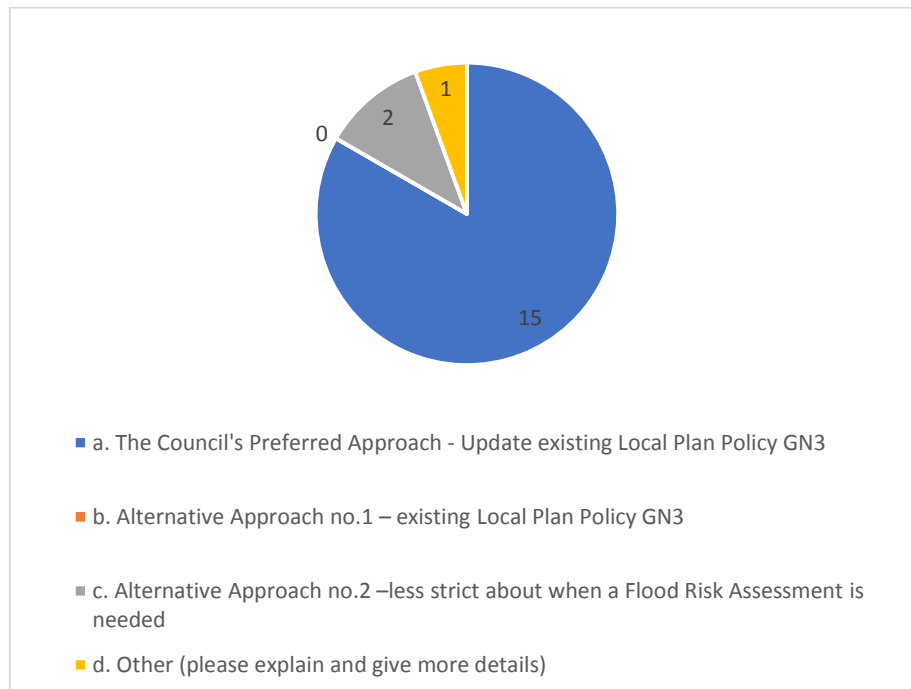
**a. The Council's Preferred Approach - Update existing Local Plan Policy GN3**

**b. Alternative Approach no.1 – existing Local Plan Policy GN3**

**c. Alternative Approach no.2 –less strict about when a Flood Risk Assessment is needed**

**d. Other (please explain and give more details)**

18 respondents answered this question. A large majority of respondents selected the council's preferred approach (15 or 83%), followed by 'Alternative 2' (2 or 11%).



#### **11. Is there anything in our preferred approach that you particularly support (or disagree with)?**

9 respondents answered this question.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Residents and members of the public:

- It is important that the actions in the Flood Risk Assessment are carried out and the Flood Risk Assessment is regularly review
- Must show that all SuDS will actually work before planning is granted
- SuDS to be mandatory in all new developments to better than agricultural drainage.
- No development to be allowed in all potential flooding zones

#### Borough, Parish, Town Councillors / Community Groups:

- Defer to local knowledge
- Growing concerns about the increasing flood risk across the Borough and it is appropriate that the existing policy GN3 is updated to reflect advances in National guidance.

#### Organisations, including developers, landowners and representatives:

Cockwill on behalf of Melford Construction Ltd

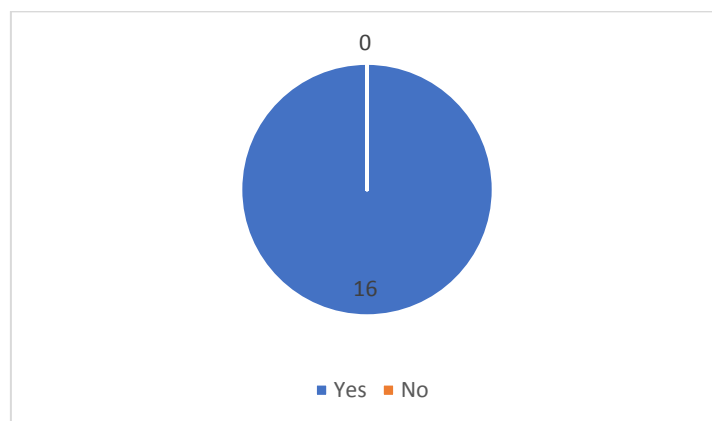
- Development of land within FR2 or FR3 should be allowed if proven not to flood.
- Any policy should allow a site within general washing of an area of FR2/3 to be objective considered on the sites own merits.

Pegasus Group on behalf of Bloor Homes, Rowland Homes and Story Homes

- Fully support the Council's approach.

#### **12. Should all new residential development incorporate green features on site such as open spaces, ponds and trees, wherever practical, in order to store surface water on site and reduce surface water run-off. Y / N**

16 respondents answered this question. All respondents supported the all new residential development should incorporate green features on site.



#### **13. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?**

18 respondents answered this question.

#### Residents and members of the public:

- A duty to cooperate is required with neighbouring councils for flood control measures for the benefit of a local community.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Lead Local Flood Authorities should do more on riparian ownership make sure they know and accept their responsibilities.
- SuDS should be retrofitted where possible to reduce the speed at which surface water runoff from roads enters watercourses.
- Official attempts to address flooding issues in Burscough have been uncoordinated and ineffective
- Any further development would not be for the current Residents of Burscough as there is currently sufficient housing in place or under construction to cater for all our Residents. Further Development would only benefit people from other areas and the finances of Developers and Council funds.

#### Borough, Parish, Town Councillors / Community Groups:

- Existing water courses should be better maintained to avoid flooding.
- The life-long efficiency and proper maintenance of SuDS cannot be assured, and further policy consideration is required.
- The policy need reflects the growing concerns about the increasing flood risk across the Borough.
- The provision of 'allowance for Climate change' has obviously been insufficient to prevent flooding downstream of these developments in Burscough.
- Burscough Flood group asked that all the Authorities and Agencies are fully consulted and information is sought as to the future plans of those Bodies and the impact of those plans is taken into account prior to any Local Plan being approved. It is hoped that sincere and meaningful consultation will take place with Residents, Town and Parish Councils, Flood Groups and all other Stakeholders.

#### Organisations, including developers, landowners and representatives:

##### Abbott Associates on behalf of Southport Land and Property Group

- The Policy needs to be informed by an up-to-date Flood Risk Assessment which covers the whole of the borough.

#### Statutory consultees and other organisations:

##### United Utilities

- Recommend that policy requires applicants to submit a foul and surface water drainage strategy that fully investigates the surface water hierarchy to minimise the risk of flooding and ensures that future development sites are drained in the most sustainable way whilst being resilient to the challenges of climate change.

##### Natural England

- Natural England welcome the Council's preferred approach and welcome the proposal that all new residential development should incorporate green features on site.

##### Environment Agency

- Policy needs to be stronger in relation to directing development away from flood risk areas and avoiding flood risk.
- Support the use of local guidance to help applicants satisfy the Sequential Tests.
- Natural Flood Management (NFM) techniques should be explored as a priority.
- Recommended that the policy outlines: the importance of collaborative working to address flood risk from all sources; the need to follow the latest climate change guidance; and requirements for increasing community resilience to flood risk.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Lack of consideration of water resources and recommend that the policy seeks to enable more sustainable practices such as trickle irrigation, above ground storage lagoons instead of abstractions which may be affected by the impacts of climate change over the plan period and beyond.

#### Lancashire County Council

- The LPA should consider revising the language used throughout the document to better match current policy documents
- Natural Flood Management (NFM) should be referenced within the Local Plan
- The Local Plan should specify the requirement for an allowance to be made for urban creep and climate change.
- The LPA should expand on policy GN2 and GN3 to further specify land to be safeguarded for current or future flood risk management and promote the use of SuDS and review.

## EH04 – CONTAMINATION AND POLLUTION

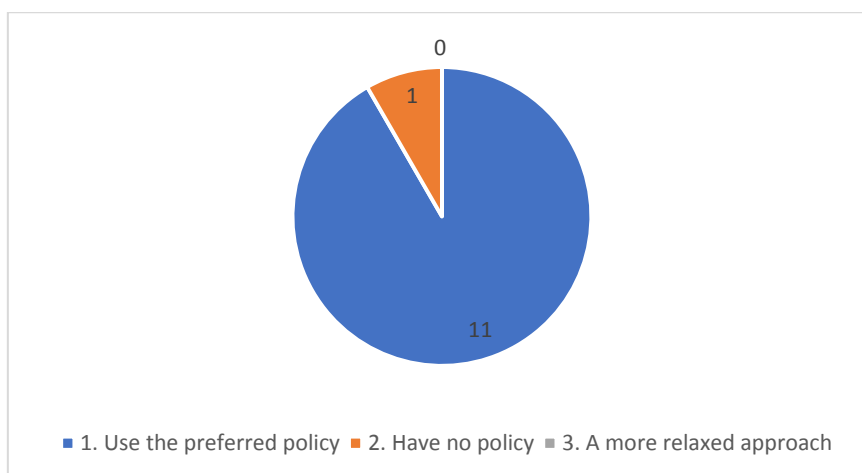
A total of 12 respondents made comments in relation to EH04 - Contamination & Pollution.

#### **Questions:**

**14. Which of the three approaches do you think is the most appropriate, and why?**

- 1. Use the preferred policy**
- 2. Have no policy**
- 3. A more relaxed approach**

A total of 12 respondents answered this question. Of the 12 respondents, 11 or 92% selected 'use the preferred policy' and 1 or 8% selected 'have no policy'.



#### Residents and members of the public:

- Need to tightly regulate/enforce controls on pollution/contamination to promote human health and enrich the environment to a high standard.
- No land pollution is acceptable for building and stringent testing must be completed as required.
- It explicitly mentions noise and light pollution.
- Contamination needs to deal with by the developer with strict requirements.
- Lack of joined up thinking between agencies.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Need to control pollution and waste.

#### Borough, Parish, Town Councillors / Community Groups:

- To reduce the contamination and pollution which is being brought about by mis-management of Simonswood Industrial Estate, and neighbouring areas. All this affects our residents and not in a good way.
- There is a need for a policy that can provide a strong enough material consideration when determining planning applications.

#### Statutory consultees and other organisations:

##### Environment Agency

- Planning regime is the most appropriate for securing the remediation of contaminated sites as it makes the restoration of the site a condition of the development, whereas other land quality regimes require voluntary landowner intervention or the action of other authorities where landowners are unable to do anything.
- It is also not possible to minimise the need for certain requirements on brownfield sites, e.g. suitability of site for development may depend on remediation to a specified standard.

### **15. Is there anything in our policy approaches that you particularly support or disagree with?**

5 respondents answered this question.

#### Residents and members of the public:

- Pollution should mean no building.

#### Borough, Parish, Town Councillors / Community Groups:

- It doesn't work for residents.
- Waste and minerals is controlled and decided by Lancashire County Council and not WLBC.
- Controls and conditions imposed on businesses that generate and handle pollutants and contaminants is ineffective.
- The compliance with Licence terms is inadequate and limited/minimal support from the Environment Agency.

#### Statutory consultees and other organisations:

##### Environment Agency

- Support a policy that seeks to avoid and reduce pollution, however there is no reference to water pollution and the risk to water quality arising from new development.

### **16. Do you have any other comments on this topic?**

4 respondents answered this question.

#### Residents and members of the public:

- Alternative 2 is also attractive for development on brownfield land.
- Contaminated material on brownfields can be removed or encapsulated to reduce any possibility of harm to land users.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Borough, Parish, Town Councillors / Community Groups:

- How can this policy be written to achieve greater protection from our County Council than is the case at present?

#### Statutory consultees and other organisations:

##### United Utilities

- Development proposals within Groundwater Source Protection Zones must accord with the latest national guidance on Groundwater Protection.
- New development within Groundwater Source Protection Zones will be expected to conform to the following: Quantitative and Qualitative Risk Assessment and Mitigation Strategy; Masterplanning; and Construction Management Plans.
- Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker.

##### Sport England

- To proactively address any amenity issues arising from sport and physical activity development and these issues to be considered development proposal that located adjacent to a sports and recreational facilities.

## EH05 – AIR QUALITY

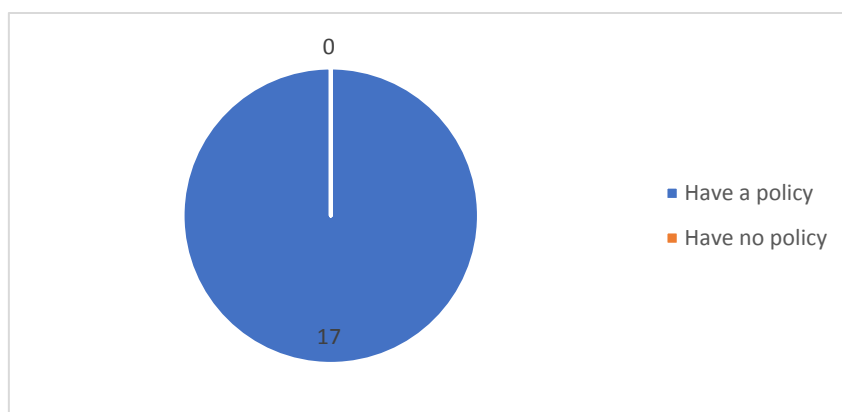
A total of 18 respondents made comments in relation to EH05 - Air Quality.

#### **Questions:**

#### **17. Which policy approach do you think we should take?**

- ***Have a policy***
- ***Have no policy***

17 respondents answered this question and all respondents supported 'Have a policy'.



#### Residents and members of the public:

- Important to be clear what priorities are and how these can be supported.
- Planting can not only improve air quality but also absorb carbon and mitigate climate change
- To prevent climate change.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Poor air quality is a cause of much human ill and will presumably negatively affect other living creatures.
- New developments must meet the highest environmental standards.
- Whilst cars will become CO<sub>2</sub> free industry is not always air pollution free.

#### Borough, Parish, Town Councillors / Community Groups:

- It is a priority for the health and well-being for residents.
- Consideration should be given to widening the scope of this policy to include noise and light pollution that arises as a consequence of new development.
- Higher impact on air quality is likely to arise in areas of congestion on the wider road network as a result of the general increase in vehicle movements from a new development.
- Risk of landscaping at softening the visual impact of new development, may inadvertently restrict air movement around the site that resulting in polluted air being contained, exposing residents.

#### **18. Can you think of any other ways we can improve or protect air quality through planning policy?**

10 respondents answered this question.

#### Residents and members of the public:

- Site new housing developments in areas with good public transport, local amenities, employment opportunities to reduce need to travel large distances.
- One source of air pollution is plastics and need to eliminate the production and use of plastic.

#### Borough, Parish, Town Councillors / Community Groups:

- Listen to local knowledge and to look at Simonswood Industrial Estate, as the air quality is not good due to the dust and HGV fumes also neighbouring firm on the adjoining council is causing poor air quality due to the odour being emitted from site.
- With vehicle use being the major cause of poor air quality there is limited scope to include measures through planning controls that have the potential to impact on car use.
- Electric vehicles will have an impact, is part of a wider strategy in Policy TI02.

#### Organisations, including developers, landowners and representatives:

- Support this policy in principle and reserve the right to comment further as the Local Plan evolves and more detail and evidence becomes available.

#### Statutory consultees and other organisations:

##### Trans-Pennine Trail

- Have a policy to encourage support for sustainable transport.

##### Sport England

- Sport England advise that the use of the 'Active Design' principles and checklist will aid in the creation of built environments that improve the air quality of the borough.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### 19. How important do you think it is to protect or improve air quality? (On a scale of 1-10)

7 respondents answered this question. Of the 7 respondents, 5 selected '10 – High' and 2 selected '8'.

#### 20. Do you have any other comments on this topic?

7 respondents answered this question.

##### Residents and members of the public:

- There are many sources of air pollution - traffic from exhausts and tyres, plastics as well as industry, all these activities can be subject to tight restrictions.

##### Borough, Parish, Town Councillors / Community Groups:

- Need more help from WLBC.

##### Statutory consultees and other organisations:

###### Trans-Pennine Trail

- New developments should include sustainable transport routes to encourage green travel.

###### National Highways

- Support the principle of this policy approach, in particular where the policy encourages developments to seek opportunities to improve air quality.

###### United Utilities

- New development should ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by neighbouring uses and vice versa. When applicable, applicants will be required to submit the relevant impact assessments, outlining any adverse effects from the neighbouring site, and any required mitigation.
- Welcome the opportunity to liaise closely with the council on potential site allocations.
- Strong preference to avoid development in the vicinity of wastewater treatment works in the borough.
- Draw attention to previous concerns raised in respect of development in proximity to wastewater treatment works near to the villages of Parbold and Newburgh and SHELAA sites in proximity to treatment works at Ainsdale.

###### Environment Agency

- Greater Manchester is about to launch Clean Air Zones which will charge some vehicles for driving on certain roads that are more susceptible to poor air quality. Is West Lancashire considering anything similar for the poor air quality zones within the borough?

## **EH06 - GREEN INFRASTRUCTURE & OPEN SPACE**

A total of 21 respondents made comments in relation to EH06 - Green Infrastructure & Open Space.

### **Questions:**

## West Lancashire Local Plan 2023-2040

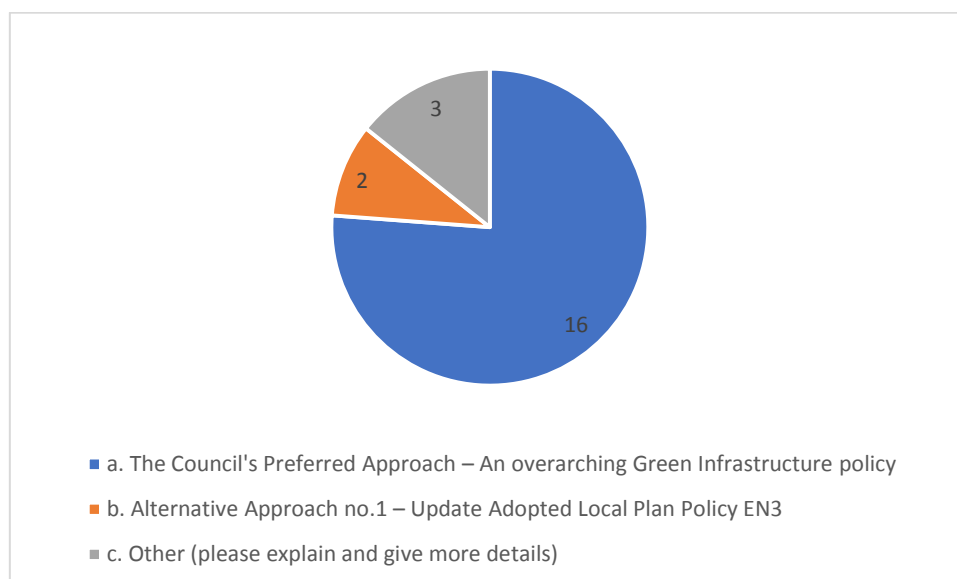
### Scope, Issues & Options Feedback Report

#### Your Views approach A: Green Infrastructure

21. Which of the above approaches is your preference in relation to Green Infrastructure? (please tick)

- a. *The Council's Preferred Approach – An overarching Green Infrastructure policy*
- b. *Alternative Approach no.1 – Update Adopted Local Plan Policy EN3*
- c. *Other (please explain and give more details)*

21 respondents answered this question. A large majority (16 or 76%) favoured 'the council's preferred approach'. 2 or 10% favoured 'Alternative Approach no.1 – Update Adopted Local Plan Policy EN3'.



22. Is there anything in our preferred approach that you particularly support (or disagree with)?

10 respondents answered this question.

#### Residents and members of the public:

- Don't want to lost green spaces.
- A borough wide network of foot and cycle routes to provide access to green space.
- Public footpaths through farmland can be a menace.

#### Borough, Parish, Town Councillors / Community Groups:

- Preferred approach extremely vague and without detail.

#### Organisations, including developers, landowners and representatives:

Pegasus Group on behalf of Bloor Homes, Rowland Homes and Story Homes

- Support the Council's preferred approach.

#### Statutory consultees and other organisations:

Trans-Pennine Trail

- Walking and Cycling needs reference to the Trans Pennine Trail.

## West Lancashire Local Plan 2023-2040

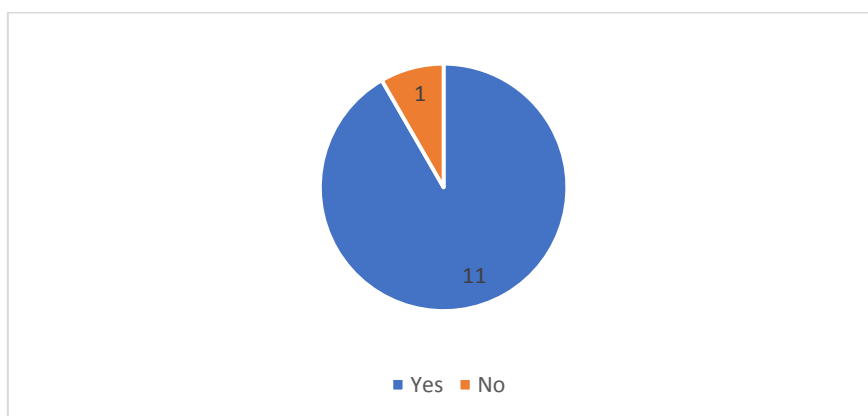
### Scope, Issues & Options Feedback Report

#### Sport England

- Supported the protection and enhancement of the borough's existing green infrastructure and welcomed the reference to the promotion of Active Design and the improvement of cycling and walking networks.

#### 23. Should all new developments above a certain size be required to incorporate features that encourage an active lifestyle for local residents and visitors, such as walking and cycling between locations? Y / N

12 respondents answered this question. 11 or 92% respondents answered 'Yes' and 1 or 8% answered 'No'.



#### 24. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

9 respondents answered this question.

#### Residents and members of the public:

- Two issues of major significance regarding access to walking, cycling and open spaces that included road safety and maintenance.
- Protect health and fitness before property development
- Setting a target for increasing green space when associated with new development in the green belt.
- The footpaths & road on the developments should be adequate.

#### Borough, Parish, Town Councillors / Community Groups:

- The impact of larger developments can be far more widespread across the Borough and are not simply resolved by allocating features within the immediate environs of a development.

#### Organisations, including developers, landowners and representatives:

#### Savills UK Ltd on behalf of Harworth Plc.

- Have no issue with the principle of the preferred approach set out in relation to Green Infrastructure, subject to further review of draft policy wording.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Recommend that costs associated with open space including off-site provision are not progressed at a Borough-wide level, to ensure the supply of homes in more affordable areas are not negatively affected through viability.

#### Statutory consultees and other organisations:

##### Trans-Pennine Trail

- Facilities should be designed to be compliant with LTN1/20 and to suit the needs of all.

##### Natural England

- Welcome the Council's preferred approach and agree the overarching Green Infrastructure policy and the development a Tree Trees, Woodland, Hedgerows and Landscaping policy.
- Natural England also advised that the Accessible Natural Greenspace Standard (ANGSt) could be a useful tool to use and any additional tree cover should be planned and planted appropriately.

##### Environment Agency

- Recommend an overarching Green Infrastructure Policy which promotes multiple benefits.
- There are potential links between delivery of GI and the information that will be established through the Local Nature Recovery Strategy in due course, such opportunities could include links between existing wildlife and nature conservation sites.

### Your views approach B: Open Space

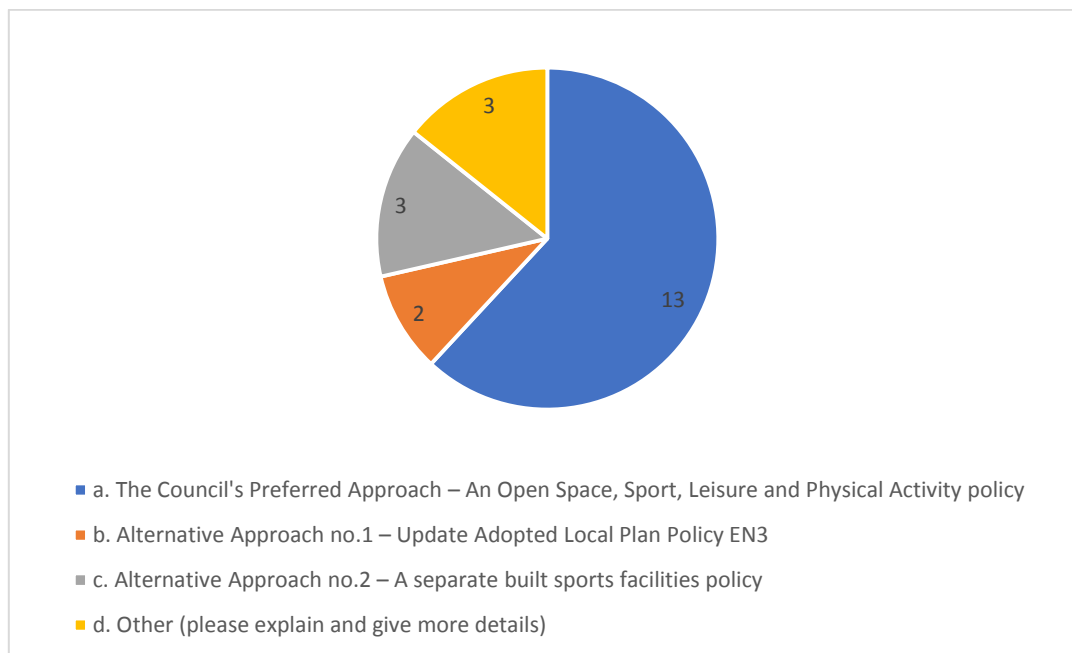
#### **25. Which of the above approaches is your preference in relation to Open Space? (please tick)**

- a. The Council's Preferred Approach – An Open Space, Sport, Leisure and Physical Activity policy***
- b. Alternative Approach no.1 – Update Adopted Local Plan Policy EN3***
- c. Alternative Approach no.2 – A separate built sports facilities policy***
- d. Other (please explain and give more details)***

21 respondents answered this question. Majority (13 or 62%) favoured 'the council's preferred approach', followed by the Alternative no.2 (3 or 14%) and Alternative no.1 (2 or 10%).

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report



#### Statutory consultees and other organisations:

##### United Utilities

- No comments.

##### Sport England

- The proposed open space, sport, leisure and physical activity policy is not combined. Instead, it is advised that a separate outdoor and indoor sport policy is proposed for the clarity of purposes to both Development Management officers and applicants.
- It is also advised that such outdoor and indoor sport policy should cover the following sections: Protection, loss of sports facilities, Enhancement, New development, Lapsed and disused sites.

#### **26. Is there anything in our preferred approach that you particularly support (or disagree with)?**

8 respondents answered this question.

##### Residents and members of the public:

- Provide open space for all age groups.
- Built sports facilities need not be in green space but complementary to it.

##### Borough, Parish, Town Councillors / Community Groups:

- Worrying comments about when loss of public open space would be permitted.

##### Organisations, including developers, landowners and representatives:

##### Pegasus Group on behalf of Bloor Homes, Rowland Homes and Story Homes

- Support the Council's preferred approach but reserve the right to comment further once more detail becomes available.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Welcome a clear policy sets out which key parts of the open space network would be protected and improved and where the use of open space for other purposes may be permitted.
- Welcome a policy which combines open space requirements built leisure facilities and these components sit hand in hand.

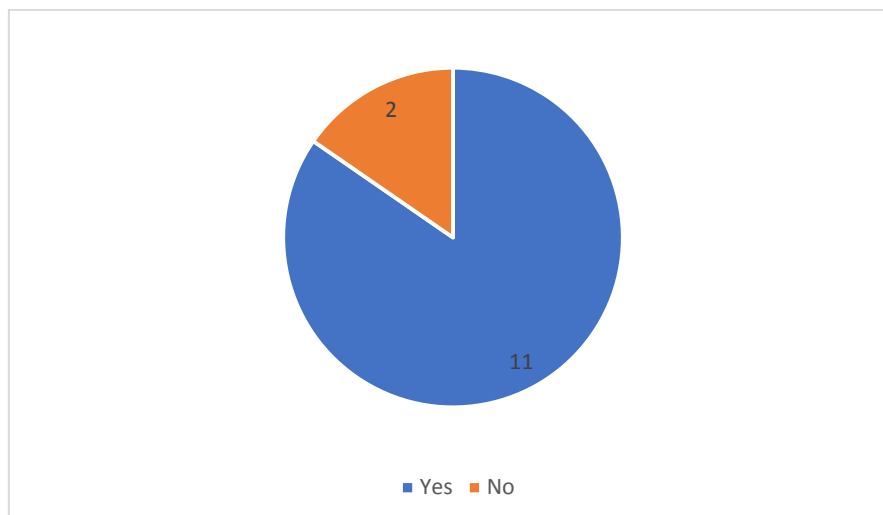
#### Statutory consultees and other organisations:

##### Sport England

- The local standards are not appropriate for sports and the use of generic standards such as this for securing provision in new development would not fully satisfy the CIL Regulation 122 tests.

#### **27. Should all new residential developments over a certain size be required to incorporate green infrastructure in the form of public open space using standards that are set locally? Y /N**

13 respondents answered this question. A large majority of respondents answered 'Yes' (11 or 85%).



#### **28. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?**

4 respondents answered this question.

#### Residents and members of the public:

- All ages need space for good health and fitness.
- Children's play areas are needed in new developments.

#### Organisations, including developers, landowners and representatives:

##### NJL Consulting

- The level of open space provision required from individual developments may need to vary depending on location and wider provision.

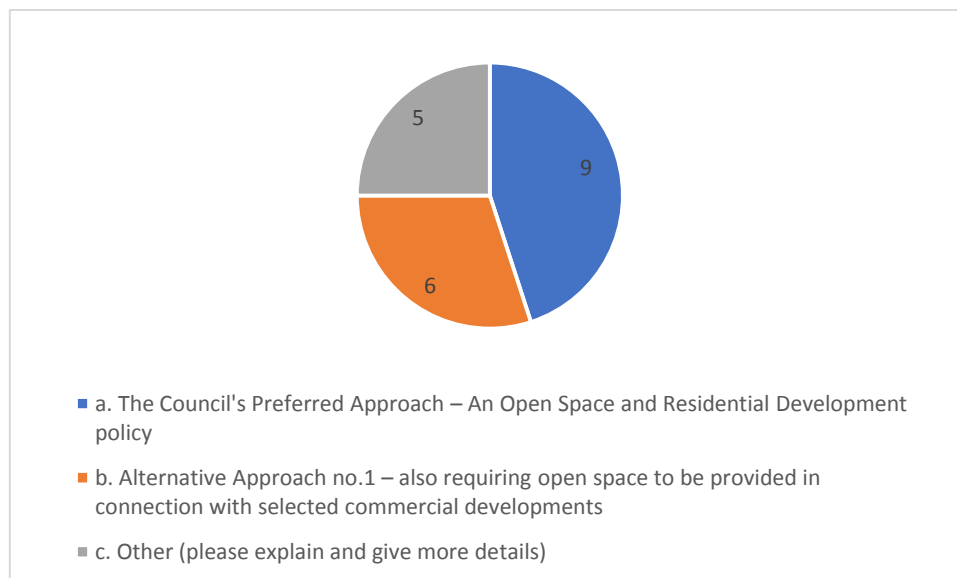
### **Your views approach C: Open Space and Residential Development**

Scope, Issues & Options Feedback Report

**29. Which of the above approaches is your preference in relation to Open Space and Residential Development? (please tick)**

- a. The Council's Preferred Approach – An Open Space and Residential Development policy**
- b. Alternative Approach no.1 – also requiring open space to be provided in connection with selected commercial developments**
- c. Other (please explain and give more details)**

20 respondents answered this question. 9 or 45% favoured 'the council's preferred approach', and 6 or 30% favoured the Alternative no.1.



Residents and members of the public:

- Consistent with other answers to update EN3.

Statutory consultees and other organisations:

Trans Pennine Trail

- No further comment.

United Utilities

- No comment.

Sport England

- Sport England prefer an overarching 'outdoor and indoor sports policy'.
- Open spaces policy for residential and commercial developments should consider the spaces can be designed to be multi-functional.

**30. Is there anything in our preferred approach that you particularly support (or disagree with)?**

6 respondents answered this question.

Residents and members of the public:



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Inevitably many of these will be in existing green belt and public access land should be a requirement of planning permission.
- The residents of Scarisbrick gain no increase in amenity for the recently approved mushroom factory which need not have been built on agricultural land and be a blot on the landscape.

#### Organisations, including developers, landowners and representatives:

Pegasus Group on behalf of Bloor Homes, Rowland Homes and Story Homes

- Support this policy approach and reserve the right to comment on the standards which are set. Need to consider viability.
- Welcome the inclusion of a table set out the cost of open space and required maintenance within this policy.
- Ask that the quality of new open space is taken account of in any standards
- Support the preparation of an SPD for open space and in particular relates to residential development.

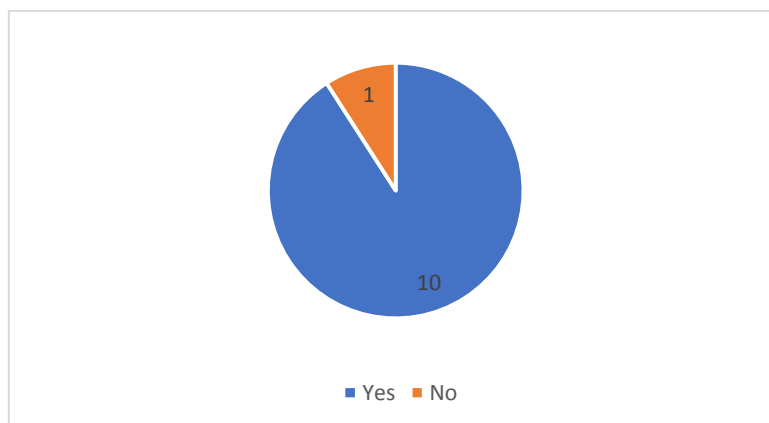
#### Statutory consultees and other organisations:

Environment Agency

- Securing open space non-residential development could be possible where the open space is provided as part of the biodiversity net gain proposals.

### **31. Should all new residential developments of any size that are unable to provide open space on site be required to provide a financial contribution towards new off-site open space or the improvement of existing public open space in that locality, as long as this is financially viable? Y / N**

11 respondents answered this question and 10 or 91% selected 'Yes'.



### **32. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?**

2 respondents answered this question.

#### Residents and members of the public:

- Even if not financially viable; "viability" has many meanings.

## West Lancashire Local Plan 2023-2040

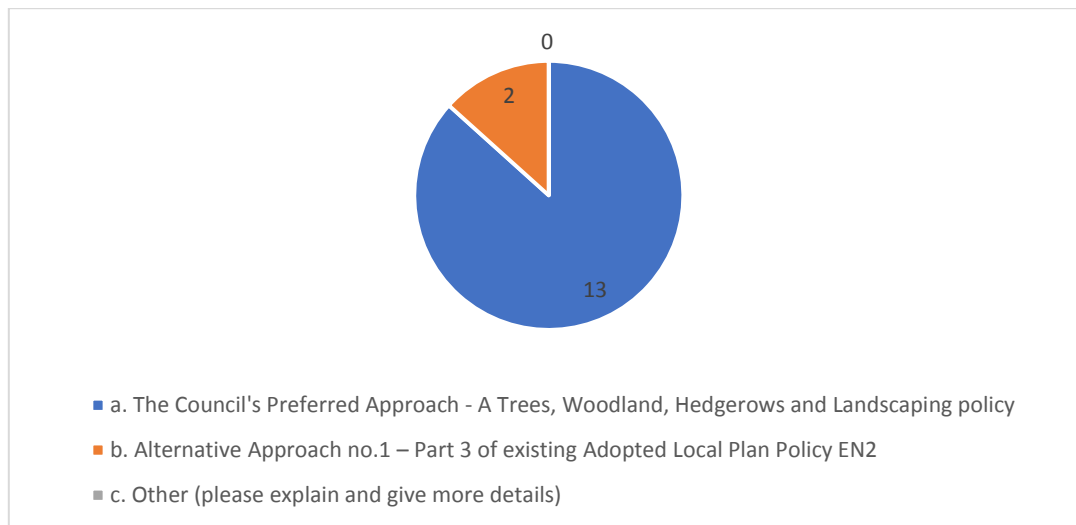
### Scope, Issues & Options Feedback Report

#### Your views approach D: Trees, Woodland and Hedgerows

#### 33. Which of the above approaches is your preference in relation to Trees, Woodland and Hedgerows? (please tick)

- a. The Council's Preferred Approach - A Trees, Woodland, Hedgerows and Landscaping policy
- b. Alternative Approach no.1 – Part 3 of existing Adopted Local Plan Policy EN2
- c. Other (please explain and give more details)

15 respondents answered this question. A large majority (15 or 87%) favoured 'the council's preferred approach', followed by the Alternative no.1 (2 or 13%).



#### 34. Is there anything in our preferred approach that you particularly support (or disagree with)?

7 respondents answered this question.

##### Residents and members of the public:

- This policy is good for our wildlife and us.
- There should be land allocated for planting woodlands to increase the woodland coverage

##### Organisations, including developers, landowners and representatives:

###### Pegasus Group on behalf of Bloor Homes

- Fully support this policy approach; to update and refine the existing Local Plan policy.
- Welcome the policy clearly setting out what information should be accompanied with a planning application to ensure the policy is effective and justified.
- Allow some flexibility within the policy.
- The policy would provide an enhanced protection of ancient woodland that aligns with the NPPF.

###### Pegasus Group on behalf of Rowland Homes and Story Homes

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Welcome the approach which aligns with national policy and provides certainty on planning application requirements
- To allow flexibility for provision of replacement planting by offering off-site or qualitative improvement.

#### Statutory consultees and other organisations:

##### Sport England

- Any proposed landscaping scheme should not have an adverse impact on the functionality of a playing field as this would in turn have adverse impact on sport and recreation as well as on people's health and social wellbeing.

#### **35. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?**

6 respondents answered this question.

#### Residents and members of the public:

- Issue of protecting trees, woodlands and hedgerows and emphasised the importance to incorporate an active policy.
- The green infrastructure needs to be protected and extended urgently.
- Need to refine any policy to meet 2050 standards. Trees take a long time to grow, especially natives.

#### Statutory consultees and other organisations:

##### United Utilities

- United Utilities is supportive of any approach to the planting of new trees and woodland and would encourage the council to consider this in the context of flood risk management and opportunities to 'slow the flow' reflecting wider comments relating to flood and surface water management.
- United Utilities also wishes to note the importance of any approach to planting new trees giving due consideration to the impact on utility services noting the implications that can arise as a result of planting too close to utility services.

##### Sport England

- Support the protection and enhancement of the borough's existing green infrastructure.
- Sport England welcome the reference to the promotion of Active Design and the improvement of cycling and walking networks.

## **EH07 - HEALTHY EATING AND DRINKING**

A total of 11 respondents made comments in relation to EH07 - Healthy Eating & Drinking.

#### **Questions:**

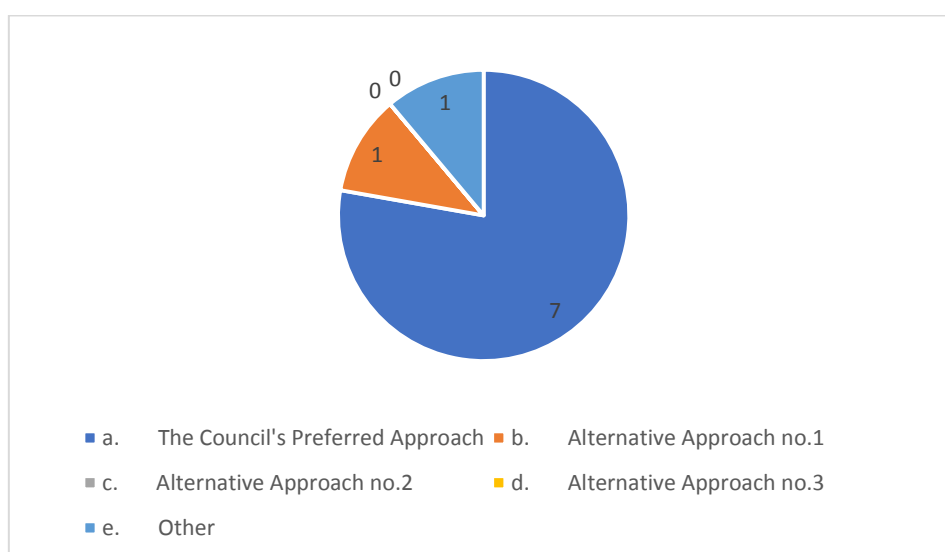
#### **36. Which of the above approaches is your preference in relation to healthy eating and drinking?**

- a. The Council's Preferred Approach - a healthy eating and drinking policy supported by more detail in a Healthy Eating and Drinking Supplementary Planning Document**

Scope, Issues & Options Feedback Report

- b. **Alternative Approach no.1 – no specific policy dealing with healthy eating and drinking**
- c. **Alternative Approach no.2 – no specific policy dealing with healthy eating and drinking as these issues will be dealt with by other policies in the Local Plan**
- d. **Alternative Approach no.3 – no specific policy dealing with healthy eating and drinking as these issues can be dealt with by other policies in the Local Plan but produce a Supplementary Planning Document**
- e. **Other please explain and give more details)**

9 respondents answered this question. Majority (7 or 78%) favoured 'the council's preferred approach', followed by the equal support for 'Alternative no.1' and 'Other' (1 or 11%).



Residents and members of the public:

- Fast Food take aways and Restaurants should not be permitted close to schools and colleges. A minimum distance of 1 km should be mandated; should be restricted to residential areas and town centres.

**37. Is there anything in our preferred approach that you particularly support (or disagree with)?**

5 respondents answered this question.

Residents and members of the public:

- Healthy eating and drinking also needs to contain requirements on food and drink packaging to eliminate plastic altogether. It is a health issue as plastic micro-particles leach from containers into food causing health problems
- Need to fill shops with tenants to keep shopping areas vibrant.

Borough, Parish, Town Councillors / Community Groups:

- Not a matter for local plan policies.
- On balance the inclusion of a policy would provide a specific focus on this issue and not allow it to be buried in other policies or supplementary planning documents.
- Having policy should provide stronger material consideration when determining planning applications

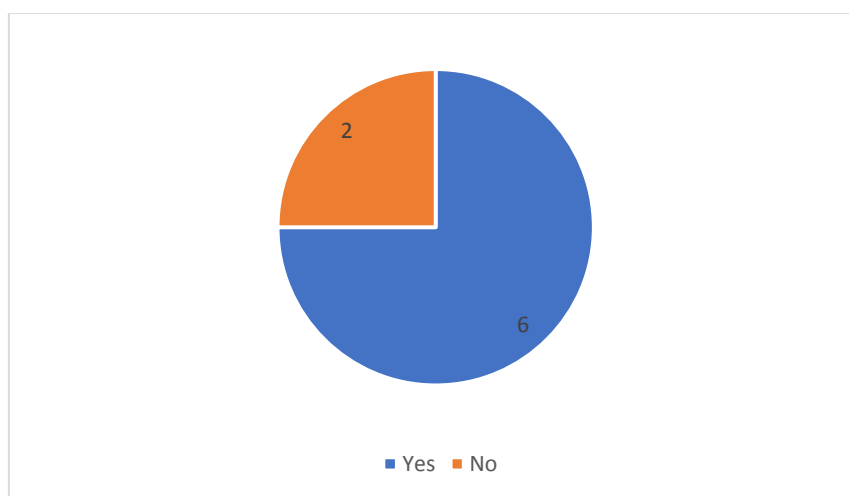
Statutory consultees and other organisations:

Sport England

- Sport England acknowledge the benefits of the inclusion of such policy and would welcome reference as to how physical activity can have a major influence on the health and social wellbeing of a local community within any forthcoming policy.

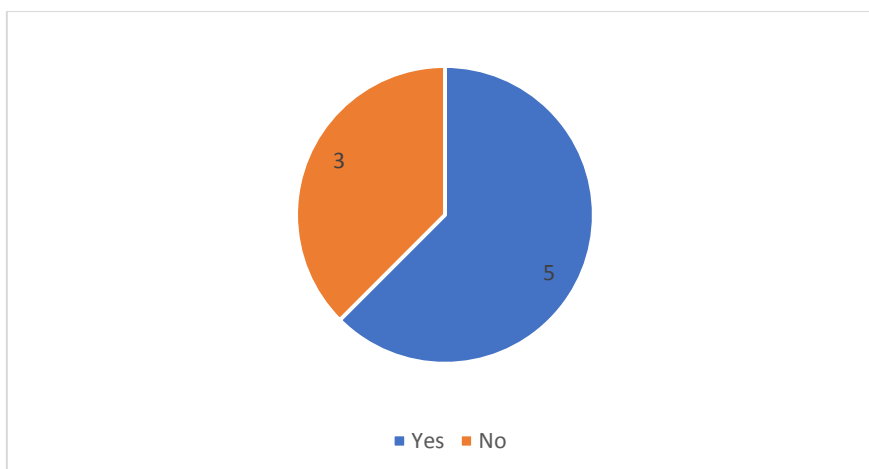
**38. Should there be restrictions upon the number of takeaways and drinking establishments permitted in our town, village, local and neighbourhood centres? Y/N**

8 respondents answered this question and 6 or 75% respondents selected 'Yes' and 2 or 25% respondents selected 'No'.



**39. Should there be restrictions upon takeaways being permitted in proximity (e.g. within 400 metres, equivalent to a 5 minute walk) of primary and secondary schools? Y/N**

8 respondents answered this question, 5 or 63% respondents answered 'Yes' and 3 or 37% respondents answered 'No'.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### 40. Do you have any other comments on this topic e.g. are there any issues we've not mentioned?

5 respondents answered this question.

#### Residents and members of the public:

- Restrictions are not required if takeaway food, drinks and packaging are healthy.
- Make this distance 1km

#### Borough, Parish, Town Councillors / Community Groups:

- These establishments are significant contributors to poor health and also as sources of littering and pollution from noise and odours.
- Consideration should also be given to how the policy can protect against increasing numbers of out of town fast food establishments increasingly being located as drive through facilities.

#### Statutory consultees and other organisations:

##### Environment Agency

- Promoting good health is more than dealing with the location of takeaways and drinking establishments, could be a more explicit or stronger link made between environment, nature and health.
- The portrait of West Lancashire section discusses the challenges faced by an ageing population – access and use of green spaces to keep people active and engaged in the community (combat loneliness) has been proven to keep people physically and mentally healthier for longer.

##### Sport England

- The benefits of making more playing fields and sport facilities accessible to the local community should also be recognised.

## 11. Transport and Infrastructure Policies

### TI01 – TRANSPORT NETWORKS

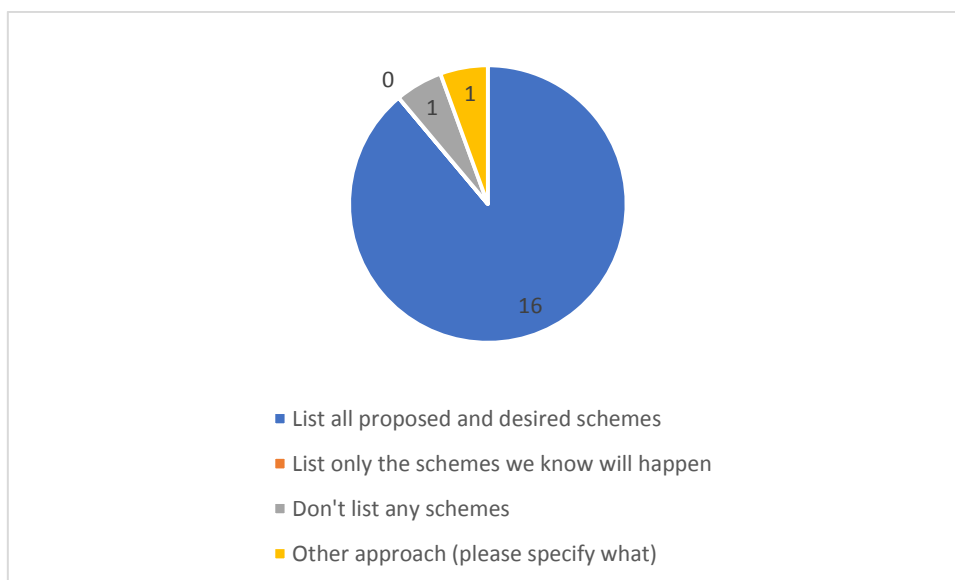
A total of 30 respondents made comments in relation to TI01 - Transport Networks.

**Questions:**

**1. What approach should we take towards transport schemes?**

- *List all proposed and desired schemes*
- *List only the schemes we know will happen*
- *Don't list any schemes*
- *Other approach (please specify what)*

18 respondents answered this question. A large majority (16 or 89%) respondents favoured 'List all proposed and desired schemes' approach.



Residents and members of the public:

- If the Derby St. Bridge is reduced to one lane then Ormskirk must have a by-pass.

Statutory consultees and other organisations:

National Highways

- There is no discussion of the SRN. The M58 is under-capacity, but has localised congestion and issues at a number of junctions, particularly at each terminus.
- The list of schemes should be evidenced to assess effectiveness and consider their impact on the SRN.
- Schemes should be included in an Infrastructure Delivery Plan, identifying when required, costs, and proposed funding.

**2. Looking at the list of schemes in the current Local Plan, are there any that should be removed in the new Plan? Are there any that should be added in the new Plan?**

A total of 10 respondents answered this question.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Residents and members of the public:

- Transport policy should focus on resolving the complex challenges in Skelmersdale.
- Footpath and cycle routes should be split off from the railway and car parks so don't come out second best. Improve the cycleway and footpath map and add the "Ormskirk Wheel" project.
- All public transport should be electrified and sourced from renewables. Needs to be affordable, frequent and widespread services, and integrated with taxi services.
- Add a Borough wide network of cycle/footpaths away from roads, parking by Up Holland station on Pimbo estate, alternative site for Skelmersdale station .on the exiting line approx 1 km closer to Rainford as a cheaper option. Remove New Bus Station for Skelmersdale Town Centre.
- Add a Link Road between Stopgate Lane and the M58 junction 1 at Kirkby to remove HGV traffic from Bickerstaffe and Simonswood.
- Policy could be based on adopted IF2(1) with additional emphasis to the Skelmersdale Rail Link and a cross reference/ to town centre regeneration plans and scope for associated land allocations.
- Update explanatory text paragraphs 8.27, 8.34 and 8.35 and Figure 8.1 of the adopted Plan as well as the Policies Map in relation to Skem rail.

#### Borough, Parish, Town Councillors / Community Groups:

- The County Council are responsible for transport infrastructure delivery. Delivery falls far behind intention in the current Local Plan so what is the likelihood of the latest infrastructure projects will be delivered in 2023 - 2040?
- Doubt over the A570 Ormskirk Bypass, Protection of the proposed route is optimistic.
- The business case has not been made to justify the new Skelmersdale rail station investment. Protection of land at Glenburn is a potential block on other development.
- Progress schemes in WLLP Policy IF2 has been disappointing. Protecting land for a use that may never be realised must be balanced against development needs.
- There should be no uplifting of potential housing need until scheme investment is confirmed e.g. Skelmersdale rail and a completion date is known and deliverable.
- The Preferred Approach is not credible, alternative approach 1 is irresponsible, only Alternative Approach 2 has merit. The wish list of schemes should be replaced by a new list of projects that have a realistic prospect of progressing.
- New schemes for further investigation could include:- i) replacement route for A59 between Burscough and Ormskirk; ii) direct route from Burscough Industrial Estate to J4 of the M58; c) improved Ormskirk to Southport connection; d) pedestrian footpath/sidewalk widening to accommodate safer cycling routes.

#### Organisations, including developers, landowners and representatives:

- The preferred policy approach is supported as alternatives would undermine scheme delivery.

#### Statutory consultees and other organisations:

- Invest in the Trans Pennine Trail.

### **3. What are your views on a policy for '20 minute neighbourhoods'? Should we promote these in the new Plan?**



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

A total of 19 respondents answered this question, strong support for the approach.

#### Residents and members of the public:

- Will not work unless road safety e.g. speed limit enforcement, traffic calming schemes and better pavements.
- Good idea. Target Ormskirk and Skelmersdale as exemplars.
- Maybe 30 minutes more realistic.
- Yes, benefits to health and accessibility.
- It was a fundamental feature of the initial Skelmersdale New Town Plan.
- Worth trying if you are creating a whole new neighbourhood.
- Difficulty with implementation.

#### Borough, Parish, Town Councillors / Community Groups:

- Idea of the 20 minute neighbourhood is nothing more than an idealist concept that has limited weight in determining where development should be focussed. If a material consideration in future planning decisions, then it may have some value.

#### Organisations, including developers, landowners and representatives:

- Delivering the 20 minute neighbourhood, should not just consider access to existing services and facilities but also how development proposals can implement new services and facilities.
- Mention of specific sites: Gladman's land interest at 'land west of Southport Road, Ormskirk' and potential for a larger 27.22ha scheme, Story and Bloor Homes sites.
- This should feature as a standalone policy influencing the spatial strategy, possibly the settlement hierarchy, vision and objectives for consistency and become part of the site allocation selection process.
- Walking distances applied to some of the objectives and indicators do not tally with the 20 minute / 1 mile neighbourhood.

#### 4. **Do you have any other comments on this topic?**

A total of 16 respondents answered this question.

#### Residents and members of the public:

- Increase access to the canal in Burscough to encourage residents to walk/cycle in to the centre. Several housing developments are alongside the canal with no direct access
- A car-free link between Burscough and Ormskirk.
- Any new cycling and walking routes in a development should be coordinated with the routes in the wider community.
- The present local plan requires suitable provision for cycling and walking routes within a development. Improving routes can only be done in co-operation with neighbouring councils and LCC.
- Routes need to consider a range of factors (access to facilities, safety, consultation with landowners, farmers etc.
- Transport should aim to become zero carbon asap.
- Expand IF2 iv to specifically refer to both links at Burscough curves rather than one.
- Promote secure cycle storage at Ormskirk and Skelmersdale Bus stations.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Promote safe cycling infrastructure and provide for the likely increase of Personal Electric Transport. Look at public space to reduce car dominance.
- Existing pavements must be improved.

#### Borough, Parish, Town Councillors / Community Groups:

- Take account of public transport at an affordable cost. New bypass needed as HGV traffic unacceptable in Burscough and will get worse.

#### Organisations, including developers, landowners and representatives:

- A plan that excludes some schemes and therefore offering the land required for their delivery no protection, could be found sound at examination. A full list of proposed transport network improvement schemes must be included to ensure future development cannot prejudice their delivery.
- Richborough supports the 20-minute neighbourhood concept focusing growth in the Borough's Main towns and selecting sites in the most sustainable locations.
- Support for continued inclusion of the proposed Green Lane Link Road in the policy.

#### Statutory consultees and other organisations:

- Proposed schemes should be listed and the policy should refer to the LTN1/20 (cycle infrastructure design).
- There is no discussion of the SRN. The M58 is under-capacity, but has localised congestion and issues at a number of junctions, particularly at each terminus.
- The list of schemes should be evidenced to assess effectiveness and consider their impact on the SRN.
- Schemes should be included in an Infrastructure Delivery Plan, identifying when required, costs, and proposed funding.
- Linkages between Transport Networks and GI / Ecological Networks / NRN could be considered further in relation to benefits.
- Support a 20 minute neighbourhood policy which also promotes the Ten Principles of Active Design.
- Policy should refer to strategic transport objectives. Skelmersdale railway station and rail links for Ormskirk – Preston, Southport, Wigan and the electrification of Ormskirk to Burscough line should continue to be supported. Schemes should be supported on the basis of future priorities and evidence.

## TI02 – PARKING STANDARDS AND ELECTRIC VEHICLE CHARGING POINTS

A total of 25 respondents made comments in relation to TI02 - Parking standards and Electric Vehicle Charging Points.

### **Questions:**

#### **5. Do you agree with our preferred approach to parking standards and Electric vehicle charging points?**

15 respondents answered this question. Overall support for the preferred approach (current LP policy setting out Lancashire agreed car parking standards and standards for electric vehicle charging points on new residential and commercial developments). 9 responses expressly stated they were in favour. Specific comments:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Residents and members of the public:

- Improve Edge Hill traffic and parking congestion within the campus. Encourage more active travel modes to also benefit health.
- Should also be bike electric charging points.

#### Borough, Parish, Town Councillors / Community Groups:

- Policy needs to consider what type/specification of EVCP is to be prescribed, if any. No universal charging point presently. Need flexibility, technology continues to evolve.

#### Organisations, including developers, landowners and representatives:

- This proposed policy approach has been superseded by Part S of the Building Regulations and is not likely to be needed. No need to repeat Building Regs.
- Need to consider the practical ability of the local grid to supply a sufficient baseload / determine network capacity Any policy should include a viability clause.

#### **6. Is there anything in our policy approach that you particularly support (or disagree with)?**

12 respondents answered this question.

#### Residents and members of the public:

- Policy should go further and require an electric vehicle charging point to be included in all residential planning applications, not just new builds.
- Consider implications of requirements for on-street electric vehicle charging points for those who do not have off-street parking facilities.
- Lack of real time bus service information is a disincentive for use.
- EHU need to encourage less cars on campus.
- Electric charging points should be required of all new homes where they can be provided in-curtilage. EV charging points should be fit for purpose and future proofed.

#### Borough, Parish, Town Councillors / Community Groups:

- The Council does not necessarily have a responsibility for the delivery of an EVCP network and to date provision has been largely funded through central government support. Further Council investment in EVCPs should therefore not be determined through this policy.

#### Organisations, including developers, landowners and representatives:

- Applying the same standards across Lancashire may not be sufficiently flexible to deal with local circumstances.
- The proposed policy approach has been superseded by Part S of the Building Regulations and is not likely to be needed / repeated.

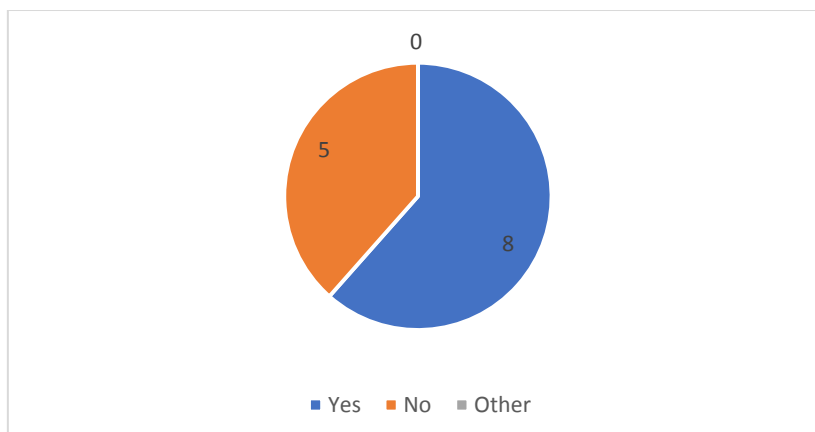
#### **7. Should we be doing more to encourage a move away from (petrol/diesel) private vehicle use?**

- **Yes • No • Other**

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

13 respondents answered this question. Of the 13 respondents, 8 or 62% selected 'Yes' and 5 or 38% selected 'No'.



#### 8. Do you have any other comments on this topic?

12 respondents answered this question.

##### Residents and members of the public:

- Fast charging facilities would increase confidence.
- Increase public transport in rural areas.
- Encourage cycling, walking and public transport.
- Monitor pollution levels in Ormskirk and Burscough and introduce clean air zones and charges if above limits.
- Number of vehicles parking in Ormskirk is the issue.
- Encourage developments to help facilitate modes of sustainable travel.

##### Borough, Parish, Town Councillors / Community Groups:

- Large employers should do more to encourage less daily car use. The Local Plan should restrict car parking extensions/additions at such sites.
- Provision of EVCP stations has the potential to generate revenue for the Council. Space in the market will be filled by private investment so a policy may need to influence where such infrastructure is located.
- Concerns how EHU's Strategic Plan 2021-2025 aim 'to be carbon neutral in the life cycle of this plan' is achieved. Local Plan, in conjunction with EHU, should include measures which discourage private vehicle use to access the campus. Would like to see a commitment to Park and Ride.

##### Statutory consultees and other organisations:

- National Highways support the principle of the policy approach.
- A policy seeking EV recharging points in non-major and minor development may secure wider adoption of EV technology.

### TI03 – COMMUNICATIONS AND DIGITAL CONNECTIVITY

A total of 7 respondents made comments in relation to TI03 - Communications and digital connectivity.

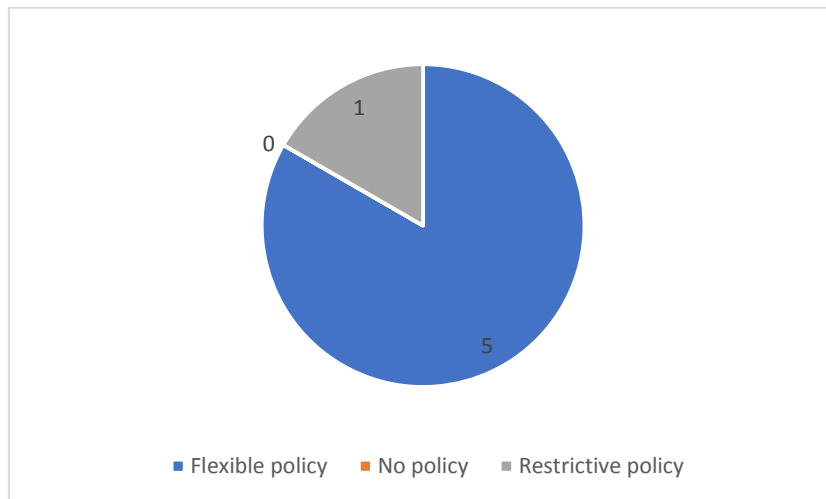
Scope, Issues & Options Feedback Report

Questions:

9. Which option do you most closely support?

- *Flexible policy*
- *No policy*
- *Restrictive policy*

6 respondents answered this question. Support (5 or 83%) for a flexible policy that governs communications and digital connectivity (the preferred approach) and one supported a restricted policy e.g. by requiring new development to go beyond Part R1 of the Building Regulations 2010.



Residents and members of the public:

- Parts of Skelmersdale cannot access high broadband speeds.

Borough, Parish, Town Councillors / Community Groups:

- The Preferred Approach provides little detail as to how this will enable additional management of new infrastructure, however the principle of minimise/mitigate any adverse impacts and loss of amenity is supported.

10. **Is there anything in our policy approaches that you particularly support (or disagree with)?**

2 respondents answered this question.

Borough, Parish, Town Councillors / Community Groups:

- 'Working to minimise/mitigate' offers little comfort as to the powers a planning authority can rely on to determine a planning application. Prefer a definitive statement of intent.

11. Do you have any other comments on this topic?

3 respondents answered this question.

Borough, Parish, Town Councillors / Community Groups:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Rural areas need fast broadband.
- Additional planning considerations to NPPF and International Commission Guidelines can be included in a policy to protect residential amenity and local provision, where possible, but such controls should not place an unnecessary burden on communication providers to improve digital connectivity.
- The Preferred Approach provides little detail as to how this will enable additional management of new infrastructure, however the principle of minimise/mitigate any adverse impacts and loss of amenity is supported.

### TI04 – RENEWABLE AND LOW CARBON ENERGY GENERATION

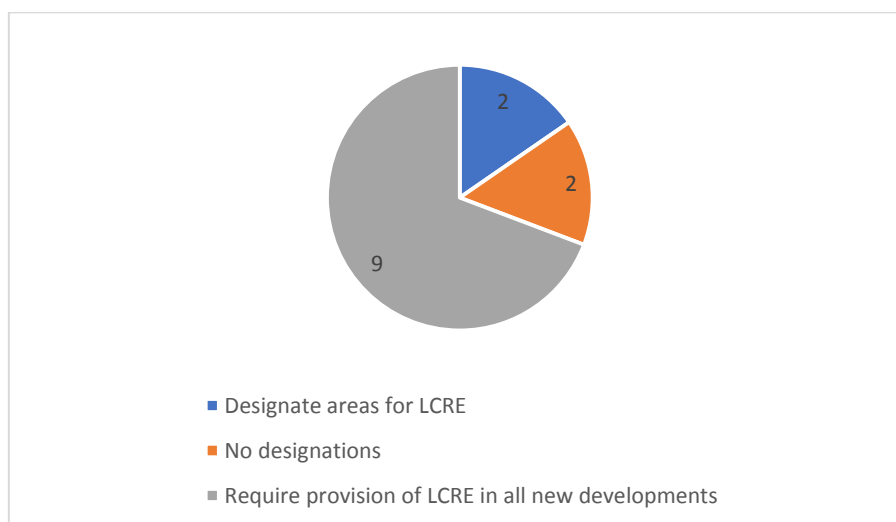
A total of 21 respondents made comments in relation to TI04 - Renewable and Low Carbon Energy Generation.

#### Questions:

##### 12. Which option do you most closely support?

- **Designate areas for LCRE**
- **No designations**
- **Require provision of LCRE in all new developments**

A total of 13 respondents answered this question. The most commonly supported option was alternative approach 2 'Require provision of low carbon and renewable energy (LCRE) in all new developments' (9) followed by 'no designations' and 'designated areas for LCRE'. The latter was the proposed preferred option.



#### Residents and members of the public:

- Solar 'farms are compatible with biodiversity / wildlife.
- Make more use of ground source heat pumps, e.g. in unbuilt-up areas.
- Encourage retrofitting solar panels e.g. on warehouse and factory roofs.
- West Lancs is very flat so onshore wind turbines would dominate landscape.
- Plan south facing roofs.

#### Borough, Parish, Town Councillors / Community Groups:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Low Carbon and Renewable Energy (LCRE) solutions are necessary to reduce reliance on fossil fuels. LP policy must be flexible to embrace new technologies whilst not being detrimental to the landscape.
- No evidence to support the benefits and need for wind farms in West Lancashire, is not supported and requires greater community consultation.
- Policy needs to include clear guidelines to define and encourage acceptable LCRE solutions that encourage community uptake.

#### Organisations, including developers, landowners and representatives:

- Requiring all new developments to provide renewable energy would be overly restrictive. It would impact on the viability and may not be physically possible in all cases.

### **13. Is there anything in our policy approaches that you particularly support (or disagree with)?**

11 respondents answered this question.

#### Residents and members of the public:

- Strongly disagree that alternative option 2 can be dismissed.
- LCRE should be expected. It should also be extended to proposed alterations/ extensions of existing property and improve the LCRE aspect of existing buildings.
- West Lancs has high proportions of Green belt and high grade 1 agricultural land and other areas of high scenery value which restricts locations for solar and wind.
- All new home, warehouses and factories should have solar panels. All renewable resources should be at point of usage.
- Energy emergency caused by under-performing on shore wind.

#### Borough, Parish, Town Councillors / Community Groups:

- Alternative Approach 2 (all new developments to provide renewable energy) has potential to make a difference. Of interest for larger developments e.g. where district heating solutions may be incorporated within the schemes.

#### Organisations, including developers, landowners and representatives:

- The preferred approach to designate specific areas of opportunity for low carbon and renewable energy is welcomed subject to them being identified through a robust selection process (evidence and stakeholders).
- Support using renewable energy sources, to reduce emissions and improve air quality and support designating the most appropriate areas for wind development.

### **14. Should we require all new developments to provide some low carbon or renewable energy through their design – for example, by requiring all new dwellings to have solar panels?**

15 respondents answered this question, vast majority said yes.

#### Residents and members of the public:

- Require air source heat pumps.
- Support ground force heat pumps and hydrogen.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Site layouts should maximise solar gain.
- All new properties should have solar panels fitted.

#### Borough, Parish, Town Councillors / Community Groups:

- Yes, but Alternative Approach 2 (i.e. this approach) should not be a standalone option The Preferred Approach should embody the principles of renewable energy. Opportunities to adopt a greater number of renewable and low energy solutions in The Council should set an example with its own (housing) stock.

#### Organisations, including developers, landowners and representatives:

- This should be dealt with through Building Regs and not Planning.

#### **15. Do you agree we should designate areas for renewable energy, where evidence shows that it would be appropriate to do so?**

14 respondents answered this question. 7 responses expressly indicated support and 4 said no.

#### Residents and members of the public:

- Needs more flexibility for the use of marginal farming land or supporting joint use of land to provide LCRE.
- Consider bird movements.
- Need to indicate where isn't suitable not where is.
- Areas should be widened.
- Near coast suitable for wind turbines, River Douglas suitable for hydron power.
- Wind turbines better out at sea.

#### Borough, Parish, Town Councillors / Community Groups:

- No, this option simply allocates land for this purpose. The issue of providing sufficient LCRE capacity is unlikely to be resolved by allocating large areas of West Lancashire.

#### Organisations, including developers, landowners and representatives:

- Not entirely clear what the Council propose at this stage and whether specific areas for this type of development are also to be identified in the plan.

#### **16. Do you have any other comments on this topic?**

7 respondents answered this question.

#### Residents and members of the public:

- Probably possible to identify many public buildings which could be fitted with solar panels.
- WLBC should be leading the field.

#### Borough, Parish, Town Councillors / Community Groups:

- What is the focus for this policy that can be delivered from 2023 to 2040?
- LCRE solutions are necessary to reduce reliance on fossil fuels. Technology is evolving and new solutions and options will arise over Plan period.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Can policy be flexible regarding potential new technologies and also be sympathetic to landscape?
- The need for wind farms as the preferred, low carbon solution is not supported. Future wind farms requires greater community consultation than through a Local Plan policy.
- Community-led LCRE is supported, but not evident what form this would take in the Preferred Approach Clear guidelines need to be set out in the policy that define and acceptable LCRE solutions.
- Merit in Alternative Approach 2 but this is not a standalone option. and the principles of renewable energy on all new developments should be embodied in the Preferred Approach. Opportunities to adopt a greater number of renewable and low energy solutions in The Council should set an example with its own (housing) stock.

#### Statutory consultees and other organisations:

- Site selection for renewable energy should regard the need to protect water resources/ land used for public water supply.
- Designating appropriate areas of the Borough for wind development and an approach for solar and other energy schemes is supported. Needs to be evidenced / informed by the Lancashire wide Environment Commission and Independent Economic Review and Lancashire County Councils Environment and Climate Change Teams.

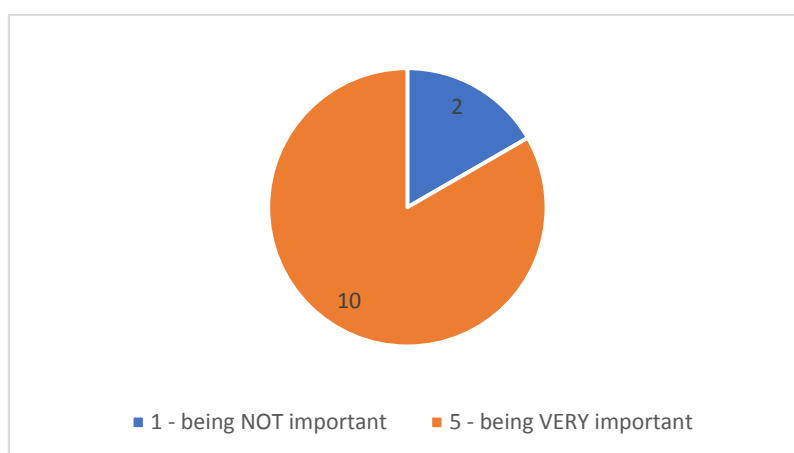
### TI05 – ENERGY EFFICIENCIES IN NEW BUILDINGS

A total of 19 respondents made comments in relation to TI05 - Energy efficiencies in new buildings.

#### **Questions:**

#### **17. How important is it to you that new development is energy efficient?**

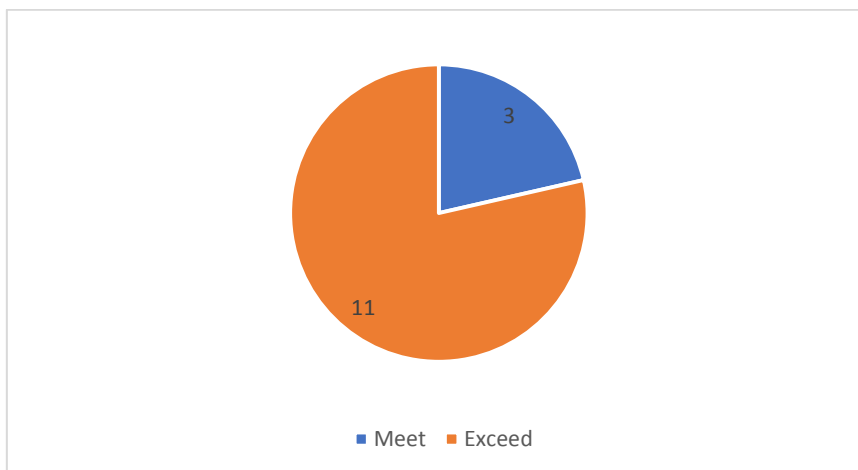
12 respondents answered this question. 10 ranked 5 (highest importance) and 2 ranked 1 (lowest importance).



#### **18. Should new development in the Borough meet or exceed national standards for energy efficiency?**

- **Meet**
- **Exceed**

14 respondents answered this question. A large majority (11 or 79%) said exceed.



Residents and members of the public:

- National Standards are not adequate in dealing with our climate crisis.
- Current Building Regulations are insufficient to achieve national zero net carbon by 2050 so a more progressive approach is needed.
- Local authorities must take a lead in dealing with climate change.
- Energy efficient homes need not cost more to develop than 'typical' housing. Viability is a lazy argument.

Borough, Parish, Town Councillors / Community Groups:

- Local Planning Authority should push for the highest possible energy efficiency standards despite opposition. Passivhaus standards quoted.
- The Preferred Approach to requiring only "certain" new developments to be better than minimum efficiency is inadequate. Alternative Approach 1 (all new development) is stronger.
- Really important that zero carbon is met as soon as possible.

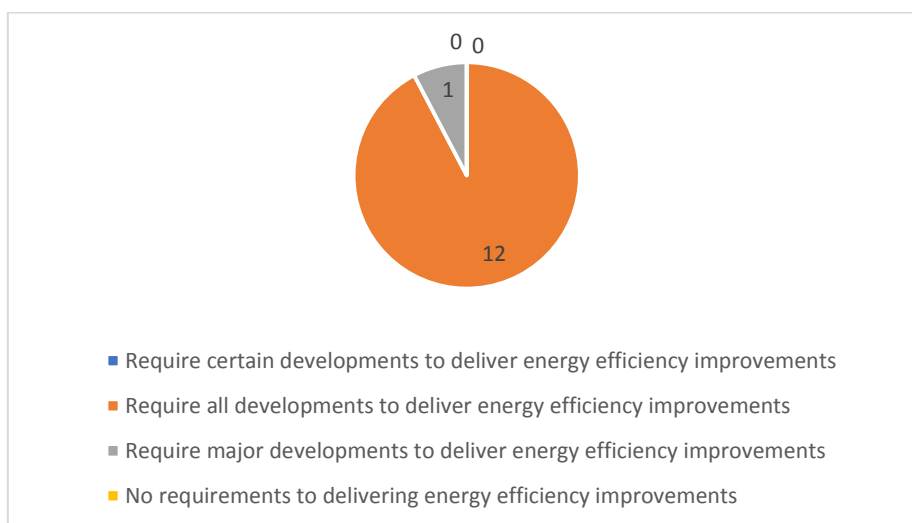
Organisations, including developers, landowners and representatives:

- DWH no evidence to demonstrate that WLBC's preferred approach of requiring certain developments to deliver energy efficiencies above national standards is necessary.
- Seddon concerned with a potential planning policy that would require all major residential development to deliver energy efficiency improvements above national standards. Must consider development viability
- Suitability of materials should be determined on a site-specific basis depending on viability, location, and design.

**19. What policy approach should we have on this subject?**

- ***Require certain developments to deliver energy efficiency improvements***
- ***Require all developments to deliver energy efficiency improvements***
- ***Require major developments to deliver energy efficiency improvements***
- ***No requirements to delivering energy efficiency improvements***

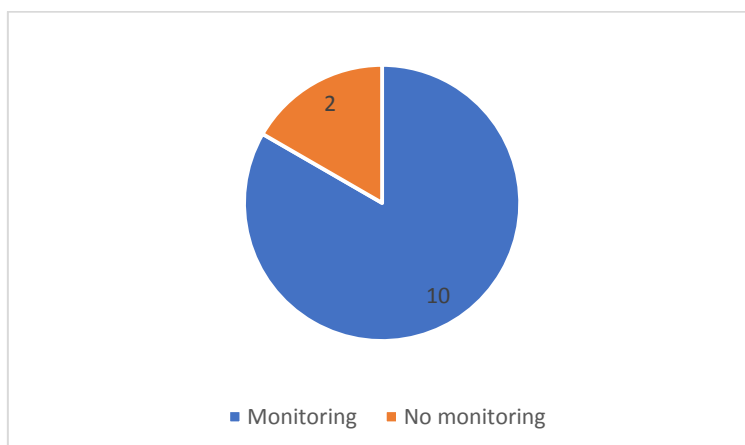
13 respondents answered this question. Overwhelming support (12) for the approach to require all developments to deliver energy efficiency improvements (Alternative 1). One response supported Alternative 2 (Require major developments to deliver energy efficiency improvements).



**20. What should the policy approach be with regard to monitoring energy performance?**

• **Monitoring** • **No monitoring**

12 respondents answered this question. A large majority (10) favoured monitoring.



Residents and members of the public:

- Concerns about smart meters.
- Little point in specifying energy efficiency measures if not monitored.

Borough, Parish, Town Councillors / Community Groups:

- Monitoring of energy performance by developers is ineffective Policy may also need to consider how failing to build to the intended design can be enforced.

**21. Is there anything in our policy approaches that you particularly support (or disagree with)?**

1 respondent answered this question.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

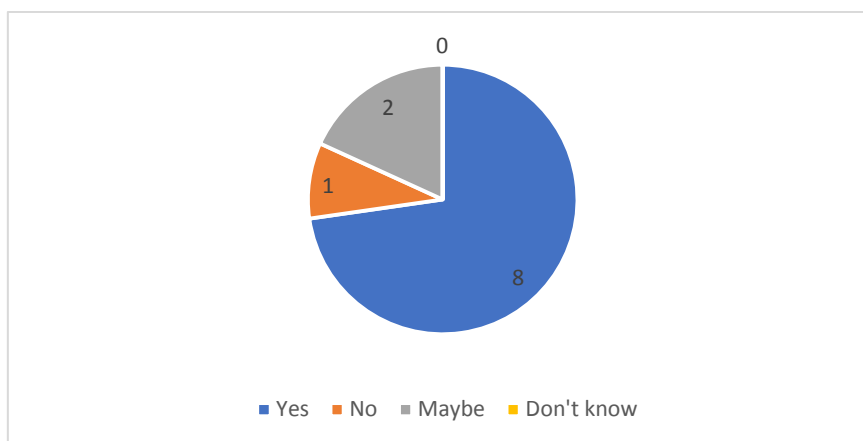
#### Residents and members of the public:

- Crucial that climate emergency is taken seriously and action coordinated.

**22. In principle, would you pay extra for a house that was zero carbon, on the basis that fuel bills would be a lot cheaper, you would be living in a 'green' house, and / or it would reduce the need to retrofit at a later date?**

**• Yes • No • Maybe • Don't know**

11 respondents answered this question. Majority (8) selected 'Yes', 2 selected 'Maybe' and 1 selected 'No'.



**23. Please rank the following priorities: - Delivering energy efficiency homes - Delivering affordable homes - Providing a greater mix of house sizes - Delivering infrastructure improvements - Improving biodiversity**

11 respondents answered this question. Delivering energy efficient homes ranked highly, being highest for 7 responses and second highest for a further 3.

#### Residents and members of the public:

- Not sure that improving nature is incompatible with the other objectives.
- All are important and it doesn't make sense to rank them.
- An unjust set of priorities!

#### Organisations, including developers, landowners and representatives:

- Concerns over the preferred approach would require certain developments to deliver energy efficiency improvements above and beyond national standards. Standards set out within Building Regulations have followed significant levels of consultation and are viable.
- Without flexibility there may be significant impacts on development viability. No evidence presented by the Council that requirements above national guidance are viable.
- Recommend against targets in excess of Building Regulations.

**24. Do you have any other comments on this topic?**

5 respondents answered this question.

#### Residents and members of the public:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- All new builds should be required to be zero carbon. Existing buildings need to be retro-fitted to be as close to zero carbon as possible

#### Borough, Parish, Town Councillors / Community Groups:

- Current Building Regulations are insufficient to achieve national zero net carbon by 2050 so a more progressive approach is needed.
- Local Planning Authority should push for the highest possible energy efficiency standards despite opposition. Passivhaus standards quoted.
- The Preferred Approach to requiring only "certain" new developments to be better than minimum efficiency is inadequate. Alternative Approach 1 (all new development) is stronger.
- Monitoring of energy performance by developers is not effective to achieve improvement. Policy may also need to consider how failing to build to the intended design can be enforced.

#### Organisations, including developers, landowners and representatives:

- HBF supports moving towards greater energy efficiency via a nationally consistent set of standards. Work with the homebuilding industry to ensure Plan policies are realistic and viable and do not overlap with national changes.
- Numerous policy approaches that could contribute to mitigating against climate change and help towards zero-carbon: e.g. reducing greenhouse gases; the location of development and services; active and sustainable transport; flood and climate resistance etc.
- The Council will need to ensure that the any policies introduced are deliverable and viable and have the support of all of the industries and sectors involved.
- Rowland Story Delivering energy efficiency improvements above national standards should be developed via a nationally consistent set of standards to provide certainty for builders. Any local policy variations should be developed in consultation with housebuilders.

### **TI06 – WATER EFFICIENCY**

A total of 17 respondents made comments in relation to TI06 - Water Efficiency.

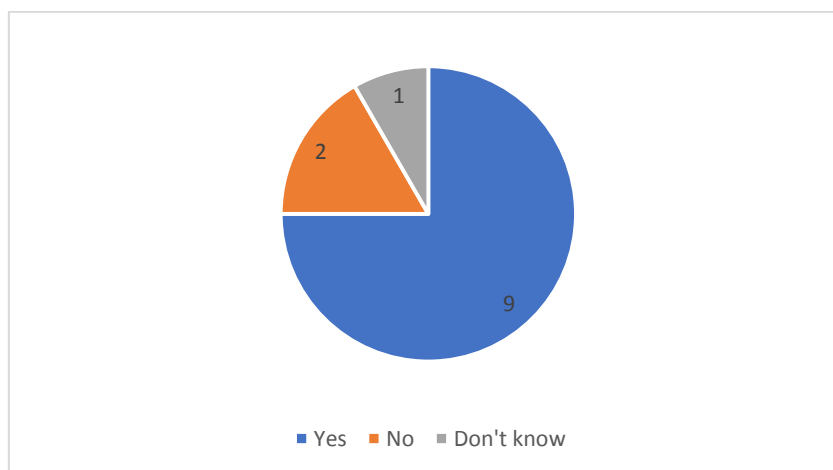
#### **Questions:**

- 25. Do you agree that we should require higher water efficiency standards (of 110 litres per person per day) in all new homes?**  
• **Yes** • **No** • **Don't know**

12 respondents answered this question. A large majority answered 'Yes'.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report



#### Residents and members of the public:

- Encourage use of "grey" rainwater and its storage at design stage.
- Rainwater and grey water measures need incorporating in designs.

#### Borough, Parish, Town Councillors / Community Groups:

- How does efficiency standards relate to a consumption volume per person per day?

#### Organisations, including developers, landowners and representatives:

- Part of Building Regs is 125 litres per person per day.
- Gladman Need to justify a need for applying the tighter water efficiency standards in order to demonstrate that the borough is classed as water stressed.
- Adopting the optional water efficiency standard of 110 litres per person per day must be justified by applying the criteria set out in the PPG relating to a 'clear local need based on evidence and consultations with relevant bodies e.g. local water and sewerage company, EA and consideration of viability.
- The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas.
- (DWH) No evidence has been provided to demonstrate a greater requirement than Building Regs is necessary (only where there is a "clear local need").

#### Statutory consultees and other organisations:

- UU A tighter water efficiency standard in new development has multiple benefits. 'Optional' requirement of 110 l/p/day for new residential development was introduced in 2015 where there is a clear need based on evidence. Evidence enclosed by Water Resources West to justify this approach. Policy wording suggested.

#### **26. Is there anything in our policy approach that you particularly support (or disagree with)?**

2 respondents answered this question.

#### Residents and members of the public:

- Tighter restrictions are required. Investigate all water usage and disposal across domestic and economic sectors.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Borough, Parish, Town Councillors / Community Groups:

- Building regulations are unlikely to achieve required improvements in water efficiency in new homes so agreed with the Preferred Approach.

#### **27. Do you have any other comments on this topic?**

9 respondents answered this question.

#### Residents and members of the public:

- Difficult to know how water consumption can be controlled by planning.

#### Borough, Parish, Town Councillors / Community Groups:

- Policy should have wider scope to include rainwater harvesting / recovery solutions to be used for secondary purposes such as WC flushing.
- Larger developments could incorporate communal water collection and storage and may inter-connected to SuDS.

#### Organisations, including developers, landowners and representatives:

- Requiring tighter restrictions on water usage (110 litres per person per day) than current Building Regulation standards. The policy must be underpinned by evidence and consulted with the local water and sewerage company, the EA etc and consider viability. viability and housing supply of such a requirement'.
- The 2015 Housing Standards Review was explicit that reduced water consumption was solely applicable to 'water stressed' areas. Policy should be developed in line with this national guidance.
- A water efficiency policy is not required, rely on Building Regulations Seddon
- Supports new residential developments achieving the optional Building Regulations G2: Water Efficiency requirement. Viability is relevant.

#### Statutory consultees and other organisations:

- EA recommend a policy requirement for rainwater harvesting in new properties or in developments over a certain size.
- CPRE Reduce car dependency with strict focus of new development at existing urban settlements.
- Invest in public transport to move from car dependency.
- Local Plan should specify that shale gas exploration is incompatible with climate emergency goals and will not be consented.

## 12. Other Policies

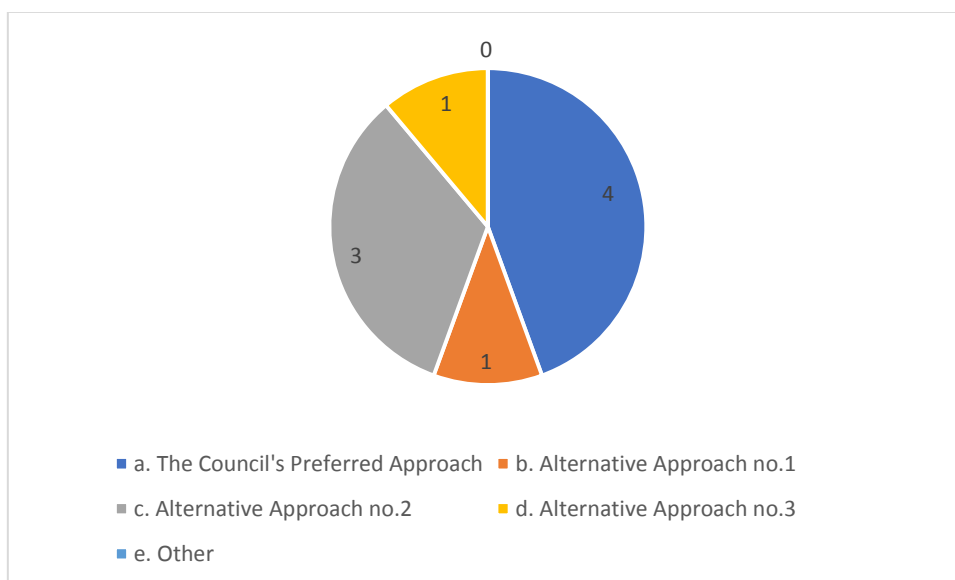
### OT01 - SEQUENTIAL TESTS

A total of 12 respondents made comments in relation to OT01 - Sequential Tests.

**Questions:**

1. Which of the above approaches is your preference in relation to sequential tests?
  - a. *The Council's Preferred Approach - Amend existing Local Plan Policy GN5*
  - b. *Alternative Approach no.1 – to not have a local plan sequential tests policy*
  - c. *Alternative Approach no.2 – a sequential test in separate town centre and flood risk policies*
  - d. *Alternative Approach no.3 – existing Local Plan Policy GN5: Sequential Tests*
  - e. *Other (please explain and give more details)*

9 respondents answered this question. 4 supported the council's approach, 3 supported the alternative approach no.2, one supported alternative no.1 and one supported no.3.



2. Is there anything in our preferred approach that you particularly support (or disagree with)?

6 respondents answered this question.

Residents and members of the public:

- Sequential testing should be required if the proposed development area with a history of previous flooding only.

Borough, Parish, Town Councillors / Community Groups:

- It is not clear why there should be a need to include a separate policy to cover sequential tests. This is not to infer that a sequential test is unnecessary, rather it questions the merit of having a dedicated policy in preference to a more targeted



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

approach that could be embodied as part of other policies such as HC01b; HC01i; EE03; EH02 and EH03.

#### Organisations, including developers, landowners and representatives:

Savills on behalf of Harworth Plc.

- The approach to sequential testing set out within the preferred option is considered appropriate, subject to local requirements for testing being fully consulted.

Cockwill on behalf of Melford Construction Ltd

- Sequential testing for flooding only works if the data is fair and detailed enough.

#### Statutory consultees and other organisations:

Environment Agency

- The policy should be carefully worded to avoid any risk of misunderstanding or confusion between the requirements for Sequential Tests to satisfy flood risk and retail proposals. Environment Agency also supported any guidance or support to make it clearer for applicants to undertake a flood risk Sequential Tests that includes all the information the LPA requires.

CPRE, The Countryside Charity

- Sequential tests – where they are required and how to do them

3. **Do you have any other comments on this topic e.g. are there any issues we've not mentioned?**

3 respondents answered this question.

#### Borough, Parish, Town Councillors / Community Groups:

- Compliance needs to play a greater role in documents and the councils' responsibilities than in the past.
- The 2010 WLBC Strategic Flood Risk Assessment Level 1 document did not show the Transparent Sequential test process or its findings and therefore the process was flawed and failed to correctly inform the decisions made.
- Important decisions to be made should independent consultants who have the expertise be consulted for the technical documents in support planning application.
- The consultants' reports should be made available to the public to avoid complaints about the failure of the council to be open and transparent.

### OT02 – VIABILITY

A total of 19 respondents made comments in relation to OT02 - Viability.

#### **Questions:**

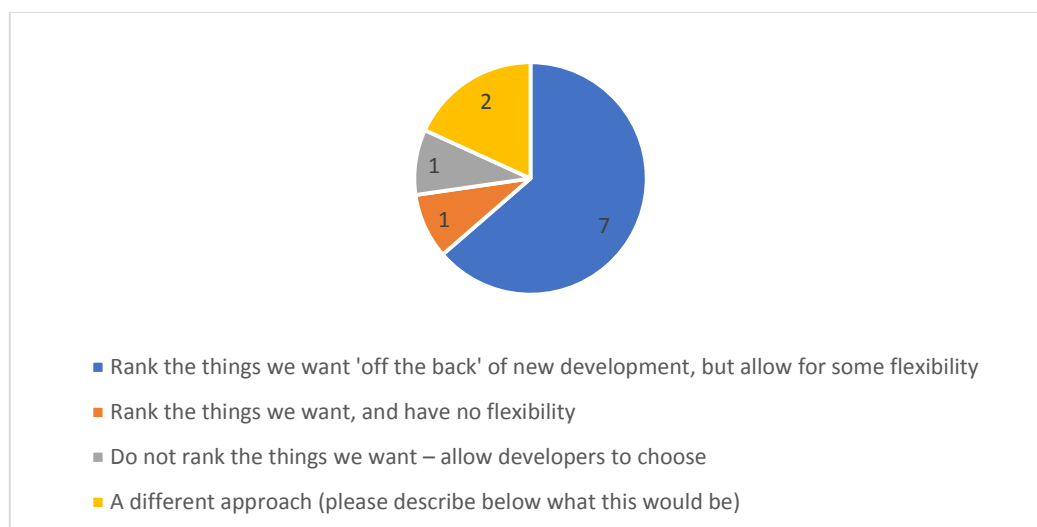
4. **What approach should the Local Plan take towards viability? Other (Please specify)?**

- ***Rank the things we want 'off the back' of new development, but allow for some flexibility***
- ***Rank the things we want, and have no flexibility***
- ***Do not rank the things we want – allow developers to choose***
- ***A different approach (please describe below what this would be)***

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

11 respondents answered this question. 7 or 64% respondents agreed the approach that Rank the things we want 'off the back' of new development but allow for some flexibility.



#### Residents and members of the public:

- Flexibility is a must if WLBC are to attract any investment.

#### Borough, Parish, Town Councillors / Community Groups:

- The question of viability is one that undermines the ability of the planning authority to achieve the best outcome for its residents and favours the preferences of developers to provide what makes most profit without any concern about what is actually needed. This advantage, exploited by developers for their own benefit, must be challenged if the wider policy aims of the Local Plan to deliver energy efficient, affordable homes of the required mix that will enable effective place-making that is supported and embraced by all residents. Add to this the need to implement structural and cultural change to deliver on the climate emergency facing everyone, then policy has to be stronger and more robust when under challenge at examination by the Inspector and developers.
- The introduction of a 'hierarchy of viability' may provide flexibility to address different priorities in different locations, but this is unlikely to reduce the challenge from developers who will seek to compromise and negotiate the desired benefits to suit their own agenda and NOT deliver on the regional needs. In this respect a different approach has to be conceived that can provide a definitive set of requirements, that is not overly rigid, and so prevent sufficient flexibility to address local variation. There is no question that developers should be given the ability to choose and pick, and so the Local Plan for the next 20 years must strive for a policy approach that can challenge viability claims by developers and kick back to help deliver against the full spectrum of policy areas and objectives.
- The determination of viability should be open to challenge by the planning authority, and an 'open book' approach should be available to examine the financial projections for a development. Through the council's wholly owned development company it should be possible to validate the viability claims. Should viability be proven, and sites remain undeveloped, the planning authority needs to investigate what powers it may be able to apply to enforce the release of land set aside for development to a provider who may be capable of making an acceptable return. This could include land transfer/sale to the council's development company.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### 5. What things should the Council look to gain 'off the back' of new development (e.g. affordable housing, open space...)? Please list them in order of importance, starting with the most important

8 respondents answered this question.

##### Residents and members of the public:

- Sustainable housing
- Affordable housing
- Public transport provision
- Open spaces
- Retention of all grade 1 & 2 arable land
- Open space
- Improve existing facilities
- Green space within developments
- Affordable housing
- Prohibit the purchase of new properties by "buy to let" landlords to encourage the development of stable communities
- Eco housing
- Solar panels
- SuDS systems
- Grey water system

##### Borough, Parish, Town Councillors / Community Groups:

- A requirements list should not be considered to reflect a strict priority as relevance and importance is likely to vary by location.
- Housing mix defined by need not supplier preference.
- Energy efficient, zero carbon homes.
- Open space and effective landscaping and habitat protection/growth
- Green infrastructure
- Transport networks and infrastructure
- Community facilities
- Affordable homes
- Parking standards and Electric Vehicle Charging Points (EVCPs)

##### Organisations, including developers, landowners and representatives:

- Affordable Housing
- Public Open Space
- Highway offsite highway improvements
- Community facility/service contributions

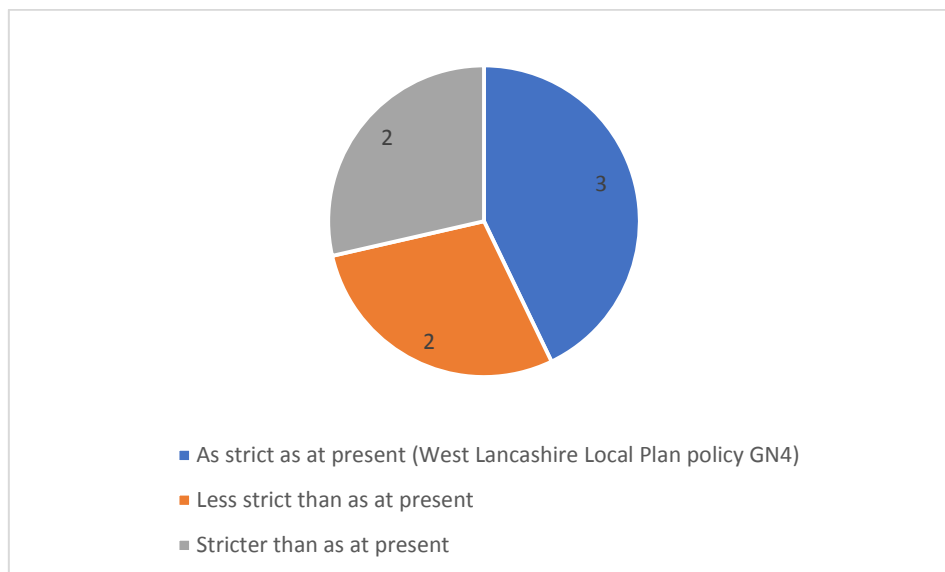
#### 6. When someone want to change use to something not supported, or not encouraged by the Local Plan (e.g. to close a community facility and convert it to housing), how strict should our policy be?

- ***As strict as at present (West Lancashire Local Plan policy GN4)***
- ***Less strict than as at present***
- ***Stricter than as at present***

7 respondents answered this question. 3 favoured 'the policy as strict as at present', 2 favoured 'policy less strict than as at present' and 2 favoured 'a policy stricter than as at present'.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report



#### Residents and members of the public:

- Each change of use should be considered on its own merits balancing risks/advantages over the long-term.
- There is no point in having underutilised facilities virtually standing empty.

#### Borough, Parish, Town Councillors / Community Groups:

- The question of viability is one that undermines the ability of the planning authority to achieve the best outcome for its residents and favours the preferences of developers to provide what makes most profit without any concern about what is actually needed. This advantage, exploited by developers for their own benefit, must be challenged if the wider policy aims of the Local Plan to deliver energy efficient, affordable homes of the required mix that will enable effective place-making that is supported and embraced by all residents.
- Add to this the need to implement structural and cultural change to deliver on the climate emergency facing everyone, then policy has to be stronger and more robust when under challenge at examination by the Inspector and developers.
- The introduction of a 'hierarchy of viability' may provide flexibility to address different priorities in different locations, but this is unlikely to reduce the challenge from developers who will seek to compromise and negotiate the desired benefits to suit their own agenda and not deliver on the regional needs.
- In this respect a different approach has to be conceived that can provide a definitive set of requirements, that is not overly rigid, and so prevent sufficient flexibility to address local variation.
- There is no question that developers should be given the ability to choose and pick, and so the Local Plan for the next 20 years must strive for a policy approach that can challenge viability claims by developers and kick back to help deliver against the full spectrum of policy areas and objectives.

#### Organisations, including developers, landowners and representatives:

Cockwill on behalf of Melford Construction Ltd

- Community facilities often require a minimum level of service user, stifling development serves no benefit to maintain a service/community facilities.

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Protection of underperforming services can be given if the LPA are minded to grant permission for additional housing.

#### 7. Do you have any other comments on this topic?

12 respondents answered this question.

#### Residents and members of the public:

- The current way the marketing exercises are conducted seems to me to be easily gamed or manipulated by a developer. Any greater specificity or robustness that can be introduced into the policy in this area would be welcomed.
- Appreciate the potential flexibility that this policy may provide, however, it is likely to depend on the precise wording of the policy.

#### Borough, Parish, Town Councillors / Community Groups:

- The determination of viability should be open to challenge by the planning authority, and an 'open book' approach should be available to examine the financial projections for a development. Through the council's wholly owned development company it should be possible to validate the viability claims. Should viability be proven, and sites remain undeveloped, the planning authority needs to investigate what powers it may be able to apply to enforce the release of land set aside for development to a provider who may be capable of making an acceptable return. This could include land transfer/sale to the council's development company.

#### Organisations, including developers, landowners and representatives:

Savills on behalf of Harworth Plc.

- Recognise the need for a policy on viability and support a flexible approach to this policy and support the Council's assertion that it would be premature to define the policy at this stage however reserve position to comment on this policy in due course.

Cockwill on behalf of Melford Construction Ltd

- Not opposed to this approach in principle, it awaits details of the Local Plan Viability Assessment to inform this policy and any response to it.

Pegasus Group on behalf of Bloor Homes, Rowland Homes and Story Homes

- Welcome the inclusion of some flexibility in terms of the requirements, recognising the differing viability challenges across different development types and areas.
- Approach would need to be fully evidenced and justified within a detailed Viability Assessment that is updated and consulted on alongside the emerging Local Plan, to allow interested parties to comment.

WSP on behalf of Seddon Homes Ltd.

- Suggest Council to consider the National Planning Practise Guidance for Viability (September 2019) sets out the Governments role for viability assessments and the methodology expected by all stakeholders when drawing up preferred approach to viability.

#### Statutory consultees and other organisations:

Sport England

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- Sport England appreciate the need for such a policy. However, the need for new and/or enhanced sports and recreation facilities should be in line with evidence from either a Playing Pitch Strategy, Built Facilities Strategy and/or other sports related strategy.
- There is some concern as to where and how the need for new and/or enhanced sports and recreation facilities will be ranked. For instance, there are likely to be different needs for certain sport facilities in different local communities, which could be overlooked through a borough wide ranking process.

CPRE, The Countryside Charity

- Viability of development – what the Council will expect (and no renegeing out) of developer contributions in line with NPPF paragraph 58.

### OT03 – DEVELOPER CONTRIBUTIONS

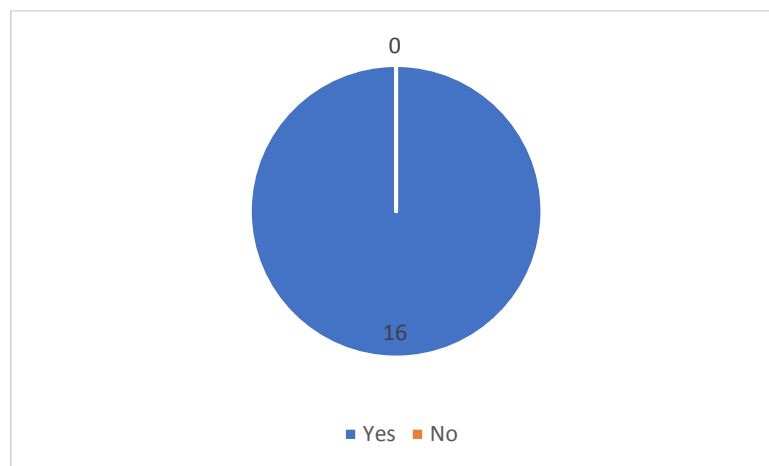
A total of 20 respondents made comments in relation to OT03 - Developer Contributions.

#### Questions:

#### 8. Do you support the principle of developer contributions? Any comments?

- Yes • No

16 respondents answered this question and all of the respondents support the principle of developer contributions.



#### Residents and members of the public:

- Without any exceptions developers should pay for all the facilities required by the development they propose.
- Contributions go in a central pot and are not necessarily expended to the betterment of the area around the development and impacted upon. All the money should be expended within radius of say 2m of the boundaries of the development
- More contributions from developers, new schools, more surgeries and dentists, generally more money.
- Developers should provide finished hedging and tree planting, mown grassed areas, paving etc. to a good standard

#### Borough, Parish, Town Councillors / Community Groups:

## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

- The principle is supported but the current policy needs reform both in terms of contributions to be paid and the way in which funds received can be used to fund infrastructure improvements.
- A more collaborative process is required that allows for resources to be pooled to enable larger schemes to be delivered in local communities.

#### Organisations, including developers, landowners and representatives:

##### Satplan on behalf of Gleeson Homes

- Supports the need for developer contributions in principle but clearly each scheme must be assessed on its own merits and the viability/ benefits of the scheme are individually reviewed.

##### Satplan on behalf of owner/developer

- Support the need for developer contributions in principle but clearly each scheme must be assessed on its own merits and the viability/ benefits of the scheme are individually reviewed.

##### Abbott Associates on behalf of Southport Land and Property Group

- A proportion of Developer Contributions and CIL monies should be directed to tackle the drainage difficulties within the Northern parishes.

##### Savills UK Ltd on behalf of Harworth Plc.

- Within the context of the existing national policy and emerging local policy relating to development viability, we support the identified need for developers to contribute proportionately towards the costs of improving infrastructure required as a result of development delivery when supported by a sound viability evidence base
- Support the principle of developer contributions, subject to full consultation upon both developer contribution and viability policies in due course.

#### Statutory consultees and other organisations:

##### Trans Pennine Trail

- Such contributions have provided recent contributions to works on the Trans Pennine Trail in West Lancashire.

##### Sport England

- The need for new and/or enhanced sports and recreation facilities should be in line with a robust and up-to-date evidence base, usually in the form of a Playing Pitch Strategy, Built Facilities Strategy and/or other sports need/investment related strategy.

#### **9. What would you say are the main issues relating to developer contributions?**

5 respondents answered this question.

#### Residents and members of the public:

- That these would be disproportionately passed on to the buyer/renter
- Profiting from the public purse unless the contributions to the CIL are large enough to cover all aspects of the development spelled out in the development contract
- Quality eco housing.

#### Borough, Parish, Town Councillors / Community Groups:

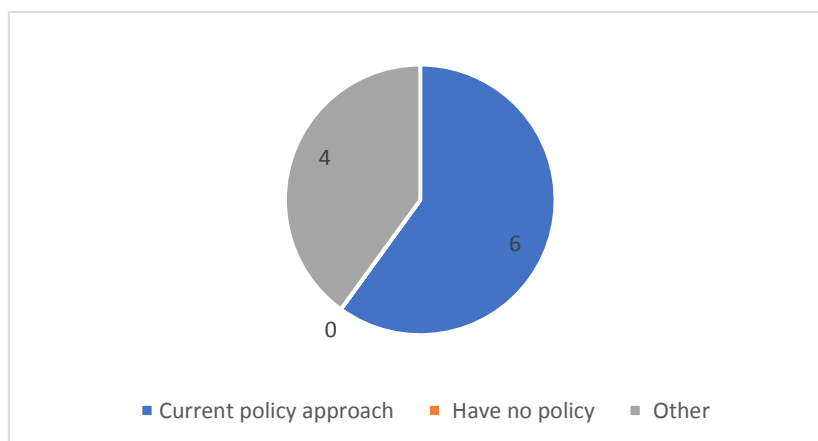
Scope, Issues & Options Feedback Report

- Viability challenge.
- Elevated house prices to offset payments due.
- Insufficient to address infrastructure needs that result from large-scale development.

10. What approach do you most closely support?

- **Current policy approach** • **Have no policy** • **Other (please provide details)**

10 respondents answered this question, and 6 respondents support the current policy approach.



Residents and members of the public:

- Much harsher policy toward development contracts awarded to developers
- Increase contributions similar to CIL in London which can be addition to s106 contributions say £200/300 m<sup>2</sup> of built development applied to net area.

Borough, Parish, Town Councillors / Community Groups:

- The Preferred Approach remains aligned to the existing CIL/S106 framework, so whilst developer contributions are supported, how they are applied, and funds utilised, should be reviewed and redesigned. Options to consider may include:
  - Apply a developer contribution on ALL development, removing any location based exemption.
  - Funds raised by contributions should be free to be invested in the locality in which the fee is generated, removing restrictions that limit investment only for direct impact of particular development sites.
  - Developer contributions could be applied on a variable basis to help drive development by house type or by location, so helping encourage delivery of the right mix in desired locations, potentially raising higher contributions for greenfield development and lower for brownfield sites.
  - Offsetting payment of contributions against delivery of infrastructure improvements or desirable features for a development should be discouraged, enabling funds collected to be used to deliver priorities for the council instead of the convenience of the developer.

11. Is there anything in our policy approaches that you particularly support (or disagree with)?

4 respondents answered this question.



## West Lancashire Local Plan 2023-2040

### Scope, Issues & Options Feedback Report

#### Residents and members of the public:

- The needs of the West Lancashire population and area should be prioritised over Developers profits

#### Borough, Parish, Town Councillors / Community Groups:

- In principle the idea of developer contributions offers a means of generating funds to invest on infrastructure improvements. However there is also the potential negative impact of elevated house prices to offset payments due; viability issues that challenge desired policy objectives; and inappropriate influence on dwelling types/mix.
- Currently West Lancashire Borough Council have adopted a CIL policy that has variable rates, with some areas rated at 0%, and applies restrictive uses for funds into affected Parishes by confining infrastructure spend on the direct consequences/impact of development. This seems inappropriate and even punitive, when the policy need clearly reflects that ALL development places additional demands on community services and recognises the need to deliver improvements across the Borough and not just to specific development sites.

#### Statutory consultees and other organisations:

CPRE, The Countryside Charity

- Developer contributions – adequate to cover all environmental.

#### **12. Do you have any other comments on this topic?**

8 respondents answered this question.

#### Residents and members of the public:

- The Council will need to determine the viability of the Plan and all of its policies and requirements including any S106 requirements.
- Suggest the building regulations are redrafted to ensure eco and quality is pushed

#### Borough, Parish, Town Councillors / Community Groups:

- In the Government White Paper on planning reform published recently, there was a proposal to replace the existing CIL/S106 contributions with a single infrastructure levy. Although this white paper was withdrawn, it is plausible that there will be reform within the life of this Local Plan. Any new policy in respect of developer contributions needs to remain flexible and not be bound by the specifics of current CIL/S106 guidance, and so avoid becoming outdated before the plan is adopted or has run its course.

#### Organisations, including developers, landowners and representatives:

Pegasus Group on behalf of Bloor Homes, Rowland Homes and Story Homes

- Support the need for clear policy setting out the expectations on new developments and also welcome the acknowledgment that this needs to be considered alongside viability, and should therefore be considered as part of the Council's Viability evidence, as per policy OT02 above.

#### Statutory consultees and other organisations:

National Highways

## **West Lancashire Local Plan 2023-2040**

### **Scope, Issues & Options Feedback Report**

- This policy is to follow the current approach of requiring certain developments to provide a development contribution towards funding or delivering new infrastructure requirements. It states that this approach would set out how, where and when developer contributions would be expected.
- National Highways will be able to comment on this approach when more detail is provided in this regard.

### **13. Comments on the consultation process**

*Comments on the use of the online portal:*

Residents and members of the public:

This is the second time I have submitted this email, I received a reply telling me I had to use the portal. I resent such cynical ploys to avoid the public.