



Scoping
Consultation
Feedback Report

November 2016

John Harrison DipEnvP, MRTPI
Director of Development and
Regeneration

Contents

1. Introduction	2
2. Who was consulted?	3
3. How was the consultation undertaken?	5
4. Who responded?	5
5. What was said and what is our response?	6
6. Conclusion	8
Appendix 1 Consultation letter	9
Appendix 2 Table of comments	13

1. Introduction

Throughout the preparation of the Local Plan Review, West Lancashire Borough Council will follow the engagement process as set out within the Statement of Community Involvement (SCI 2016) and the Regulations¹ governing the development plan process.

This consultation statement covers the feedback that the Council have received through the initial Scoping consultation with key stakeholders, which sought views on what the Local Plan Review, and the subsequent new Local Plan, should cover. The Council is keen to ensure that all statutory bodies with an interest in our Local Plan Review have the opportunity to let us know their views throughout the preparation of the Local Plan and right from the outset.

This consultation statement sets out:

- a) Who we consulted,
- b) How they were invited to make comments, and
- c) A summary of the main issues raised.

Structure of the Statement

The statement is structured as follows:

Section 2 gives details of who was consulted including the list of specific and general consultation bodies.

Section 3 sets out how the consultation was undertaken.

Section 4 includes who responded to the consultation.

Section 5 includes a summary of the main issues raised and our responses.

Section 6 is a conclusion to the consultation.

¹ Town and Country Planning (Local Planning) (England) Regulations 2012.

2. Who was consulted?

West Lancashire Borough Council contacted 104 statutory stakeholders/bodies by either email or letter.

Lancashire County Council	Wigan Metropolitan Borough Council (MBC)
Chorley Borough Council (BC)	St Helens MBC
South Ribble BC	Knowsley MBC
Preston City Council	Sefton MBC
Fylde BC	Liverpool City Council
Blackpool BC	Wirral MBC
Wyre BC	Halton MBC
Lancaster City Council	Ribble Valley BC
Blackburn with Darwen BC	Hyndburn BC
Burnley BC	Pendle BC
Rosendale BC	Parish Councils – All in West Lancs
Shadow Lancashire Combined Authority	Greater Manchester Combined Authority
Liverpool City Region Combined Authority	Association of Greater Manchester Authorities (AGMA)
Lancashire Enterprise Partnership	Greater Manchester Local Enterprise Partnership
Liverpool Enterprise Partnership	Transport for Greater Manchester (GMPTE)
Merseytravel	Highways England
Merseyrail	Office of Rail Regulation
Northern Rail	Network Rail Infrastructure Limited
Civil Aviation Authority	Homes and Communities Agency
United Utilities	The Coal Authority
Electricity North West	National Grid

Scottish Power	Telecommunications companies (Mono)
Central Lancashire NHS	Lancashire Police
North West Ambulance Service	Lancashire Fire & Rescue Service
Historic England	The National Trust
Environment Agency	Natural England
Department for Environment, Food and Rural Affairs (DEFRA)	Marine Management Organisation
Canal & River Trust	Forestry Commission
Lancashire Local Nature Partnership	Liverpool City Region Local Nature Partnership
Greater Manchester Local Nature Partnership	Wildlife Trust for Lancashire, Manchester and North Merseyside
RSPB	Campaign to Protect Rural England (CPRE)
Friends of the Earth	Sport England
North and Western Lancashire Chamber of Commerce	Home Builders Federation
National Federation of Property Professionals	National Housing Federation North West
Peel Ports Mersey	Gypsy Council, and other organisations representing Gypsies and Travellers
Age UK	Equality and Human Rights Commission
West Lancashire Council for Voluntary Service (CVS)	Well North and Well Skelmersdale
Church Commissioners	Ormskirk Community Partnership
Diocesan Board of Finance	

3. How was the consultation undertaken?

Consultation was undertaken with the specific and general consultation bodies recorded in the Local Plan database. All bodies were sent a letter either electronically or by post including details about the consultation event.

The consultation was undertaken in line with the recently adopted Statement of Community Involvement (SCI)².

4. Who responded?

From those notified about the consultation on the Local Plan Scoping Report a total of 18 people responded.

Of these responses the breakdown of respondents is as follows:

Parish Councils	5
Other LPAs	3
Statutory Bodies	6
Resident Groups	2
Other significant bodies	2

² <http://www.westlancs.gov.uk/planning/planning-policy/planning-policy-consultation/statement-of-community-involvement.aspx>

5. What was said and what is our response?

A summary of the main issues raised and our response is set out below, the full comments submitted to West Lancs Borough Council can be found in appendix 2.

Overall, it was pleasing to note that there were a number of comments which were in agreement with the Council's current approach in moving forward with a new Local Plan Review.

Organisations were asked to comment on matters and issues that a new Local Plan for West Lancashire should seek to address, and what the time period that the Plan should cover.

In order to inform thoughts on representations at this initial scoping stage, a list of policy areas reflects the initial thoughts of the Council on what the Local Plan should cover include:

- Strategic Policies – encompassing the key sustainable development framework for the Borough, requirements for residential and employment development, releasing land from the Green Belt (if required) and the allocation of strategic development sites.
- General Development Policies – encompassing development management policies that affect several types of development / land-use, including policies on settlement boundaries, safeguarded land, the design of development, and demonstrating viability in applications.
- Economic Policies – policies setting out the strategy for economic development in the Borough, including allocations for employment areas and protection of existing employment sites
- Residential Policies – policies setting out the strategy for residential development in the Borough, including housing allocations, provision of affordable, specialist and older persons' housing, accommodating travellers and caravans / house boats, and student accommodation.

- Infrastructure and Services Policies – policies guiding transport and highways matters, general utilities infrastructure, provision of community facilities and services and developer contributions towards new infrastructure.
- Environmental Policies – policies guiding protection and enhancement of the natural and built environment, habitats for protected species, public open space and other green infrastructure and policies related to climate change.

In addition, the Council sought views on the length of time that the Local Plan should cover. Typically, Local Plans cover a 15-year period, but often have to safeguard land for beyond that timescale, particularly where Green Belt release is required in the Plan. This helps to protect the new Green Belt boundaries from encroachment and provides a greater degree of certainty and permanence about the Green Belt boundary beyond the Plan period.

Neighbouring Local Planning Authority responses agreed to cooperate with the production of the Local Plan Review and offered assistance in evidence sharing with the likely hood of addressing cross boundary issues.

A number of responses were received with regards to the scope of strategic and general development polices, primarily from Parish Council's and resident associations over the release of greenbelt. West Lancashire Borough Council undertakes rigorous evidence based studies regarding the amount of development needed and analysis of suitable land available. This forms part of the evidence base of the Local Plan Review and will be address through the development of the Local Plan.

English Heritage expressed their support for general development polices which encompass design polices, ensuring that the existing context of the Borough is maintained and enhanced.

With regards to infrastructure, a number of statutory bodies responded. Highways England are keen to work with West Lancashire Borough Council through the development of the Local Plan Review and offer assistance in highways matters and site allocations. This support is welcomed in ensuring that the impact on the wider transport network is managed.

Natural England and the Environment Agency reiterated their support for Environmental Polices to be addressed within the Local Plan review, indicating that the scope of the plan should extend to the creation and enhancement of the existing provision.

Sport England support the production of a Local Plan Review and the development of polices and evidence for the safeguarding of playing pitches.

Overall the responses to the Scoping of the Local Plan Review were supportive the statutory bodies and other bodies agree with the six main principles proposed in the scoping. West Lancashire Borough Council will ensure to work with statutory and other bodies in the production of the Local Plan Review.

6. Conclusion

This consultation focused on the scope of West Lancashire Borough Council's emerging Local Plan Review. There was not a significant response to the consultation but there was a number of statutory bodies who did express their support for a Local Plan Review.

Overall the quality and expertise within the responses was high with a number of important issues being raised, and relevant and supportive advice being given.

The following are ways in which responses to this consultation have been / will be taken account of:

- emails have been exchanged with various respondents in order to discuss issues and share information to improve the quality of the emerging Local Plan. Further meetings are being arranged

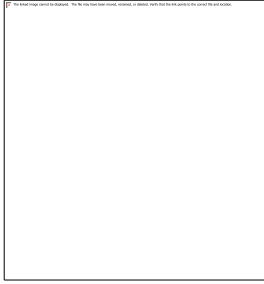
- work that had already been drafted has been reviewed and changes made where appropriate to address issues that have been raised

- all comments submitted are being considered in light of ongoing work and our ability to address the issues raised within the consultation document.

West Lancashire Borough Council will now spend some time ensuring that, where appropriate, the Local Plan Review Issues and Options Paper covers the points above before it is issued for public consultation.

Appendix 1

Consultation letter



**Directorate of Development and Regeneration
Services**

**John R Harrison DipEnvP, MRTPI
Director of Development and Regeneration**

PO Box 16, 52 Derby Street
Ormskirk, West Lancashire, L39 2DF
Telephone: 01695 577177
Website: www.westlancs.gov.uk
Email: peter.richards@westlancs.gov.uk

Date: 28th September 2016
Your ref:
Our ref:
Please ask for: Peter Richards
Direct dial no: 01695 585046
Extension: 5046

Dear Sir / Madam

A Local Plan Review for West Lancashire

As a key stakeholder in relation to planning and development in West Lancashire I am writing to you to inform you that the Council's Cabinet recently endorsed a proposal from officers to begin a review of the current West Lancs Local Plan 2012-2027 with a view to preparing a new Local Plan for the Borough.

As part of that resolution to endorse a Local Plan Review, the Cabinet also approved a consultation exercise with key stakeholders such as yourself on what the scope of the Local Plan Review, and subsequent new Local Plan, should be, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

As such, I invite your organisation to comment on the matters and issues that a new Local Plan for West Lancashire should seek to address, and the time period that the Plan should cover.

It is the Council's intention to prepare an Issues & Options Paper for the Local Plan Review for public consultation in February / March 2017 and so your input at this initial stage will be crucial in guiding which issues that Paper should cover but we will of course invite further representations from you on the Issues & Options Paper in the New Year, as well as all subsequent consultations on the Local Plan.

In order to inform your thoughts on any representation at this initial scoping stage, at the present time the following list of policy areas reflects the initial thoughts of the Council on what the Local Plan should cover.

Possible Policy Areas for the Local Plan, and their scope, include:

- Strategic Policies – encompassing the key sustainable development framework for the Borough, requirements for residential and employment development, releasing land from the Green Belt (if required) and the allocation of strategic development sites
- General Development Policies – encompassing development management policies that affect several types of development / land-use, including policies on settlement boundaries, safeguarded land, the design of development, and demonstrating viability in applications
- Economic Policies – policies setting out the strategy for economic development in the Borough, including allocations for employment areas and protection of existing employment sites
- Residential Policies – policies setting out the strategy for residential development in the Borough, including housing allocations, provision of affordable, specialist and older persons' housing, accommodating travellers and caravans / house boats, and student accommodation
- Infrastructure and Services Policies – policies guiding transport and highways matters, general utilities infrastructure, provision of community facilities and services and developer contributions towards new infrastructure
- Environmental Policies – policies guiding protection and enhancement of the natural and built environment, habitats for protected species, public open space and other green infrastructure and policies related to climate change

In addition, the Council are seeking your views on the length of time that the Local Plan should cover. Typically, Local Plans cover a 15-year period, but often have to safeguard land for beyond that timescale, particularly where Green Belt release is required in the Plan. This helps to protect the new Green Belt boundaries from encroachment and provides a greater degree of certainty and permanence about the Green Belt boundary beyond the Plan period.

However, recent planning appeal decisions across the country have made safeguarded land a more vulnerable designation than it once was, and instead safeguarded land is often used to provide flexibility where development is perhaps a little slower on allocated sites in the Plan (and even where it is not).

As such, one possible approach is to consider a longer Plan period that then does not require safeguarded land to be designated and gives the public more certainty over whether a site is allocated for development or not but also gives the development industry greater flexibility and choice. A longer Plan period also allows the Council and its partners to think longer-term in planning for infrastructure and growth and delivery of housing and employment land.

In this way, an argument could be made for a 20, 25 or even 30-year Plan period, and the Council would welcome your thoughts on this subject.

If you have any specific views on these proposed policy areas or believe that additional issues that have not been considered in the list above should be included, or you have views on the length of the Plan period, please make your representation to the Council by **5pm on Friday 28th October 2016**, making clear reference to the Local Plan, either by post or email at the following addresses:

Peter Richards
Strategic Planning & Implementation Manager
West Lancashire Borough Council
52 Derby Street
Ormskirk
L39 2DF

Email: localplan@westlancs.gov.uk

If you have any queries regarding this letter or the Local Plan, please contact Peter Richards on 01695 585 046 or at the above email address.

For your information, the Council has also published a new Local Development Scheme (LDS) for the preparation of the Local Plan Review, and so if you wish to find out more about the process the Council will go through in reviewing the Local Plan and preparing a new one, you can download the LDS at:

<http://www.westlancs.gov.uk/planning/planning-policy.aspx>

I look forward to hearing from you.

Yours faithfully



Peter Richards
Strategic Planning & Implementation Manager

Appendix 2

Table of comments

	Name	Organisation	Comments	Response
1.	Mark Evans	Fylde Borough Council	<p>Fylde Council is committed to working with West Lancashire Borough Council as a neighbouring authority under the Duty to Co-operate, in support of the plan-making process.</p> <p>Fylde Council has no comments to make in response to this consultation. We trust that we will be notified of further stages of plan preparation in due course.</p>	Comments Noted
2.	Warren Hilton	Highways England	<p>Highways England recognises that road infrastructure is an important component of delivering economic growth, particularly for the largest settlement within the West Lancashire Borough, Skelmersdale, which is served directly by the M58 motorway. We are therefore keen to support the Council in ensuring that its future growth aspirations can be accommodated by the strategic road network (SRN) in a sustainable way.</p> <p>From our perspective, the Council will need to ensure that the need for (and scope of) any improvements required to the SRN are identified during the development of the Local Plan Review and then incorporated into a revised Infrastructure Development Plan (IDP). The IDP will need to also details by what mechanisms such infrastructure is to be delivered at the appropriate time during the lifetime of the Plan period so that the impacts can be accommodated sustainably.</p> <p>At present, we are not aware of the locations and sizes of the new land allocations that the Council is looking to incorporate into the Local Plan as part of the review process. Without this information, it is difficult for us to advise precisely as to the extent of the SRN that the Council will need to assess within its evidence base for the review. In general terms, we would need to see that Junction 26 of the M6, together with Junctions 3, 4 and 5 of the M58 had been assessed as well as the Switch Island junction as the western end of the M58. Depending on the scale and location of additional sites, it</p>	<p>West Lancashire Borough Council welcomes Highways England comments and the sharing of data/existing traffic modelling available.</p> <p>As part of the evidence to support the Local Plan, the Council will undertake a Transport and Highways Assessment.</p>

	Name	Organisation	Comments	Response
			<p>may also be prudent to include M6 Junction 27 within the scope of this highway impact transport assessment.</p> <p>Highways England is happy to assist this work as much as possible through the provision of traffic count data and any existing traffic modelling that we have available. Once the detail of the proposed land allocations is known, we would then be able to help inform the Council's assessment of the potential traffic impacts on both the SRN and local highway network through the use of Highways England's GraHAM traffic modelling tool. This tool is a gravity-based traffic model that into which sites and road networks can be programmed. The tool is then able to generate trip generation and assignment data, which can then be used as the basis for further traffic modelling that the Council can gain an understanding of the wider impacts of all of the sites.</p> <p>As it is not a planning authority, Highways England is unable to comment upon the scope of the Local Plan Review. However, whilst we have no firm view as to the proposed lifetime of the new Plan, we note in this case that the aim of the review is to incorporate potentially much higher levels of housing growth; accommodating the authority's own Objectively Assessed Need together with an element of the needs of surrounding adjacent local authority areas. Consequently, this would favour taking a longer-term view of the Local Plan and of the approach to embedding the funding mechanisms needed to deliver any necessary infrastructure over such an extended period. The approach will therefore need to be mindful of the possibility of an increased need to travel between areas of new development and adjoining areas via the SRN for those new residents and businesses that are likely to have existing linkages for work, leisure or employment outside of the West Lancashire Borough.</p>	

	Name	Organisation	Comments	Response
3.	Margaret Atherton	Downholland	<p>The Parish council is concerned about the preservation and protection of the Green Belt. This is important.</p> <p>Another consideration is that retention of commercial properties instead of giving up the sites for housing should be included.</p>	<p>Comments Noted.</p> <p>The need for the release of Green Belt land will depend on the scale and broad location of new development that the Local Plan ultimately identifies.</p> <p>Retention / Protection of employment land will be considered as a policy option.</p>
4.	Mark Harrison	Coal Authority	<p>The Coal Authority is a Non-Departmental Public Body sponsored by the Department for Business, Energy & Industrial Strategy. The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.</p> <p>The main areas of planning interest to the Coal Authority in terms of policy making relate to:</p> <ul style="list-style-type: none"> the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales; the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with 	<p>Comments Noted.</p> <p>In preparing the Local Plan, the Council will have reference to LCC Minerals Safeguarding policy and consider policy on stability investigations and method statements.</p>

	Name	Organisation	Comments	Response
			<p>the advice contained in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales; and</p> <ul style="list-style-type: none"> ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales. <p>Consequently The Coal Authority would like to see the Local Plan Review set out a policy framework as follows:</p> <ol style="list-style-type: none"> Cross refer to the minerals safeguarding policy of the Lancashire Minerals Local Plan Set out a policy to address land instability including investigation and treatment/remediation Incorporate consideration of mineral sterilisation and land instability in the site allocation assessment methodology <p><u>Conclusion</u> The Coal Authority welcomes the opportunity to make these early comments. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages.</p>	

	Name	Organisation	Comments	Response
5.	Rachel Emmett	Lancashire Police	<p>The content of the West Lancashire current Local Plan relating to crime reduction is as follows;</p> <p><i>Policy GN3 Criteria for Sustainable Development</i> <i>Development will be assessed against the following criteria, in addition to meeting other policy requirements in the Local Plan.</i></p> <p><i>1. Design/Setting</i> <i>Proposals for development should:</i></p> <p><i>vii. Create safe and secure environments that reduce the opportunities for crime and prepare a crime impact statement where required in accordance with the Council's validation checklist.</i></p> <p>Although this makes reference to safe and secure environments which reduce crime opportunities it fails to indicate how this can be done or what planners will be looking for in achieving this. Lancashire Constabulary invest highly in Early Action to reduce vulnerabilities across all communities in Lancashire. Early Action is crime prevention which is people focused. To compliment this in serving the communities of Lancashire, crime prevention is fundamental to reducing victims of crime and creating safer communities. Working in partnership with planning authorities is key to creating safer communities by ensuring new developments design out crime risks. This can be done in several ways including layout, physical security, lighting, encouraging natural surveillance and including appropriate boundary treatments.</p> <p>Applicants should be advised to obtain a Crime Impact Statement from Lancashire Constabulary's Designing Out Crime Officers. They are specially trained in reducing crime risks through design and security and also approach each application on a site specific basis relevant to crime figures and trends in the area around the site.</p>	<p>Comment Noted.</p> <p>Consideration will be given to the following within a design policy:</p> <ul style="list-style-type: none"> • Layout that promotes security, • External lighting, • Good levels natural surveillance, • Appropriate boundary treatments.

	Name	Organisation	Comments	Response
			<p>There is no charge for this service as Lancashire Constabulary is committed to creating safer communities.</p> <p>The Revised Local Plan should expand on the current Local Plan to ensure developments incorporate key measures to reduce crime risks. Suitable wording that would help to achieve this would be as follows;</p> <p>Designing out crime and designing in community safety should be central to the planning and delivery of new development. Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder.</p> <p>A Crime Impact Statement should be obtained from Lancashire Constabulary's Designing Out Crime Officers in order to comply with the validation checklist. This will address crime risks relevant to the proposal and the area. Proposals will be expected to address the following minimum requirements, as appropriate to the nature and scale;</p> <ul style="list-style-type: none"> · Layout that promotes security, · external lighting, · good levels natural surveillance, · appropriate boundary treatments. 	
6.	Karl Creaser	Historic England	<p>Thank you for consulting Historic England on the above proposal. This response details the expectations of the Local Plan for West Lancashire and the historic environment.</p>	Comments Noted.

	Name	Organisation	Comments	Response
			<p>Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p> <p>Historic England has produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/) may be useful in the production of your Plan.</p> <p>The Local Plan for West Lancashire will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy.</p>	

	Name	Organisation	Comments	Response
			<p>A sound local plan should be based on an up-to-date evidence base which includes reference to the historic environment. The evidence base needs to identify:</p> <ul style="list-style-type: none"> • What contribution the historic environment makes to the character of the area, to its economic well-being and to the quality of life of its communities; • What issues and challenges is it facing and likely to be facing in the future; • What opportunities the historic environment offers for helping to deliver the other objectives in the Plan area. <p>When undertaking this exercise, it is important to bear in mind that it is not simply an exercise in listing known sites but, rather understanding their value to society (i.e. their significance). There is a need to identify the subtle qualities of the Borough and its local distinctiveness and character which can easily be lost.</p> <p>There will need to be an assessment of the likelihood of currently unidentified heritage assets including sites of historic and archaeological interest being discovered in the future.</p> <p>It may also be necessary to identify heritage assets outside the Council's area where there are likely to be setting impacts caused by any development proposals put forward in the area. It is also important to bear in mind that some asset types are not currently well recorded.</p> <p>For example, the Register of Parks and Gardens of Historic Interest in England, is thought to represent only around two thirds of sites potentially deserving inclusion.</p> <p>Evidence gathering can also help to identify parts of a locality that may be worthy of designation as a conservation area and identify assets that are worthy of inclusion in a locallist.</p>	

	Name	Organisation	Comments	Response
			<p>Potential sources of evidence include:</p> <ul style="list-style-type: none"> • National Heritage List for England • Historic Environment Record • Conservation Area Appraisals and Management Plans • Local Lists • National and Local Heritage At Risk Registers • Historic Characterisation Assessments • World Heritage Site Management Plans • In house and local knowledge expertise <p>Where the evidence base is weak, the Council will need to commission additional work to ensure that the historic environment is adequately dealt with and can be used to inform the Plan.</p> <p>Spatial Portraits</p> <p>The Local Plan should include a proper description and assessment of the historic environment in the Borough and the contribution it makes to the area (NPPF, Paragraph 169). The Plan needs to describe the historical growth of the area and identify its historic environment. It should also clearly identify the different places their character and identity and the contribution it makes to all aspects of life in West Lancashire. In terms of Local Plans should include strategic policies to conserve and enhance the historic environment of the area and to guide how the presumption in favour of sustainable development should be applied locally. It is vital to include strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and any Neighbourhood Plans that come forward are required to be in general conformity with the strategic policies of the Local Plan.</p>	

	Name	Organisation	Comments	Response
			<p>The strategic policies for the historic environment will derive from the overall strategy to deliver conservation and enjoyment of the area's heritage assets for generations to come. These may be policies that concern themselves specifically with the development of types of heritage asset. But delivery of the NPPF objective may also require strategic policies on use, design of new development, transport layout and so on. Indeed every aspect of planning, conceivably can make a contribution to conservation. Plan policies in all topics should be assessed for their impact on the strategic conservation objective.</p> <p>Conservation is not a standalone exercise satisfied by standalone policies that repeat the NPPF objectives. The Local Plan should also consider the role which the historic environment can play in delivering other planning objectives:</p> <ul style="list-style-type: none"> • Building a strong, competitive economy • Ensuring the vitality of town centres • Supporting a prosperous rural economy • Promoting sustainable transport • Supporting high quality communication infrastructure • Delivering a wide choice of high quality homes • Requiring good design • Protecting green belt land • Meeting the challenge of climate change, flooding and coastal change • Conserving and enhancing the natural environment • Facilitating the sustainable use of minerals 	

	Name	Organisation	Comments	Response
			<p>In formulating the strategy it is advisable and often necessary to consider the following factors:</p> <ul style="list-style-type: none"> • How the historic environment can assist in the delivery of the vision and the economic, social and environmental objectives for the plan area; • How the Plan will address particular issues identified during the development of the evidence base including heritage at risk; • The interrelationship between the conservation and enhancement of the historic environment and the other Plans policies and objectives; • The means by which new development in conservation areas and within the setting of heritage assets might enhance or better reveal their significance; • How local lists might assist in identifying and managing the conservation on non-designated heritage assets; • How the archaeology of the Plan area might be managed; • How CIL funding might contribute towards ensuring a sustainable future for individual assets or specific historic places and whether or not certain heritage assets might need to be identified; • Whether masterplans or design briefs need to be prepared for significant sites where major change is proposed; • What implementation partners need to be identified in order to deliver the positive strategy; • What indicators should be used to monitor the effectiveness of the strategy. <p><u>Development Management Policies</u></p> <p>In terms of development management policies, it is clear that the NPPF expects plans to include detailed policies, which will enable a decision maker to determine a planning application.</p>	

	Name	Organisation	Comments	Response
			<p>The Local Plan for West Lancashire should include specific policies for the historic environment in order to help inform decisions that affect it and others should where possible cross-reference heritage related issues.</p> <p>Key issues to be considered are (not wholly comprehensive):</p> <ul style="list-style-type: none"> • Undesignated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc). • Designated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc). • Archaeology including remains of less than national importance. • Conservation areas • Registered parks and gardens • Heritage at Risk • Important views and vistas • Landscape character • Local character and distinctiveness • Individual settlements • Historic shop-fronts and advertisements • Public realm • Design • Information to accompany an application. <p><u>Strategic Cross Boundary Issues</u></p> <p>Strategic cross boundary issues that affect the historic environment are issues that can only be effectively addressed at a larger than local scale and may cover the issues listed below, this is not an exclusive list and strategic issues will have to considered on an area by area basis.</p> <ul style="list-style-type: none"> • extensive designated and non-designated heritage assets, e.g. World Heritage Sites, historic landscapes, • major heritage based tourism attractions, the management of 	

	Name	Organisation	Comments	Response
			<p>which may impact upon more than one Authority</p> <ul style="list-style-type: none"> • major quarries for building and roofing stone, e.g. Portland stone • major changes to green belt which affect the preservation of the setting and character of historic towns • major development proposals likely to affect important heritage assets in a neighbouring authority, e.g. major urban extensions, infrastructure proposals <p>These strategic issues will not necessarily and always be the same as the strategic policies for the protection and enhancement of the historic environment included in a Local Plan but are likely to be a sub-set of them. Indeed local circumstances may indicate that strategic approaches may not always be needed. The sustainability appraisal scoping report should help to identify what is important for a particular plan area.</p> <p>Site Allocations</p> <p>The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that 'special regard' should be had to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated and retention/exploration should be promoted.</p> <p>Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have</p>	

	Name	Organisation	Comments	Response
			<p>upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the <u>principle</u> of development and loss of any open space is acceptable. It needs to evaluate:</p> <ol style="list-style-type: none"> 1. What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution. 2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets. 3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level. 4. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset? <p>The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.</p>	

	Name	Organisation	Comments	Response
			<p>The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.</p> <p>Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered. For example, this might require the policy to include detailed criteria or providing supplementary information with the supporting text.</p> <p>Historic England strongly advises that you engage conservation, archaeology and urban design colleagues at the Council to ensure that you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered in the development management policies, in the allocation of any site and in the preparation of the SEA.</p> <p>They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER. This will ensure that there is joined up and robust approach is undertaken to historic environment issues.</p>	
7.	Mark Cawood	Knowsley Council	<p>We welcome the opportunity to comment on the scope of the Local Plan Review as a neighbouring local planning authority.</p> <p>In general, we support the comprehensive range of policy themes that are proposed for inclusion in the Plan, noting that some of the potential housing and employment land supply may need to come from Green Belt sites. Assuming this turns out to be the case, a difficult balance will have to be struck between meeting growth needs and protecting the environment. This will likely be the</p>	<p>Comments noted.</p> <p>The Council will continue to work with neighbouring authorities through the duty to cooperate requirements and are actively working on a joint SHELMA with the Liverpool City Region.</p>

	Name	Organisation	Comments	Response
			<p>greatest challenge, and indeed the most contentious issue, in moving the West Lancashire Local Plan towards the Examination stage and we are keen to ensure that any resultant impacts on Knowsley's communities are addressed, both in terms of cross-boundary issues and of shared housing market areas.</p> <p>Turning to the matter of the proposed residential polices, as you will recall, Knowsley Council was consulted in 2015 on the preparation of the West Lancashire Provision for Traveller Sites DPD. Whilst there are no longer any plans to progress this document, you will need to consider whether any of the work carried out here can be taken forward through the preparation of the new Local Plan. In any case, our response to previous consultations remain unaltered and, as such, there is still no evidence to suggest that any sites in Knowsley could appropriately help to meet West Lancashire's needs for Gypsy and Traveller accommodation at the current time.</p> <p>The length of the plan period as currently proposed is considered to be appropriate. We can however see the benefits of a longer term plan period, particularly where this aligns with the timescales of the Liverpool City Region Strategic Housing and Employment Land Market Assessment. We have no substantive comments to make in respect of the revised Local Development Scheme.</p> <p>Finally, we shall look forward to receiving the Issues and Options Paper for the Local Plan Review early in the New Year and we are committed to working with you to resolve any cross boundary land use issues that may emerge at a later stage in the Local Plan process.</p>	

	Name	Organisation	Comments	Response
8.	Gemma Jackson	Environment Agency	<p>Environmental Policies – policies guiding protection and enhancement of the natural and built environment, habitats for protected species, public open space and other green infrastructure and policies related to climate change</p> <p>In terms of environmental policies for the future Local Plan we are in agreement with those listed. We would also recommend inclusion/incorporation of the following:</p> <p>Protection and enhancement of the natural and built environment <i>Remediation of contaminated land during redevelopment</i> Redevelopment of brownfield sites should be remediated to create high quality land.</p> <p><i>Enhancement of available habitats/creation of new habitats</i> In particular ensuring the ability of species to adapt to climate change by enabling the connectivity of habitats which then allows the migration of species and greater genetic diversity.</p> <p>Green infrastructure <i>Enabling the ability to reduce pollution and provide a better water environment.</i> We are aware that the Council might be exploring the redevelopment of Skelmersdale, including around the River Tawd as one of its future priorities. This river has pollution issues upstream from potentially industrial sources. Due to the culverted nature it has not been possible to trace the source of this pollution and therefore an alternative solution would be to use natural wetland where the river is in an open channel to remove the pollutants, improving the condition of the water environment.</p>	<p>Comments noted.</p> <p>Flooding will be given due consideration in Local Plan Policies, informed by the Strategic Flood Risk Assessment.</p>

	Name	Organisation	Comments	Response
9.	Irene Roberts	Aughton Parish Council	<p>Your letter of 28 September 2016 was considered by the Parish Council at the October monthly meeting.</p> <p>Given the amount of time spent and the vast cost involved in the production of the West Lancashire Local Plan 2012-2027, adopted just 3 years ago in October 2013, Aughton Parish Council would confirm its support of the rational of the current Development Plan Document and would not support any further release of Green Belt land in this area in the future.</p>	<p>Comments noted.</p> <p>The need for the release of Green Belt land will depend on the scale and broad location of new development that the Local Plan ultimately identifies.</p>
10.	Bryan Pready	Ormskirk Community Partnership	<p>Thank you for your letter of 28 September, giving Ormskirk Community Partnership the opportunity to make initial comments about the scope of your review of the local plan.</p> <p>Your letter has been considered by our Committee, which has asked that the following topics should be included:-</p> <ol style="list-style-type: none"> 1) Development of Ormskirk Town Centre as an attractive location for business, employment, leisure and as a service centre for the surrounding area. 2) Ormskirk Town Centre environment, including the appearance of buildings and public areas, including car parks. 3) Transport that meets the needs of all sections of the population both locally and linking to the major urban centres that surround West Lancashire, together with its impact on Ormskirk Town Centre. 4) Edge Hill University; campus development and impact on Ormskirk in relation to demand for local services, traffic generation and student housing. 5) Protection of the green belt around Ormskirk and Aughton. 6) Housing that meets the needs of all sections of the local population. 7) Meeting the needs of increasing numbers of people in the oldest age groups. 	<p>Comments Noted.</p> <p>The Council will consider the comments carefully as the Local Plan is prepared.</p>

	Name	Organisation	Comments	Response
			<p>8) Energy infrastructure and development, including the role of renewable energy and the response to potential fracking in West Lancashire. Measures to reduce dependence on fossil fuels.</p> <p>9) Consideration of the impact of new technologies on business, employment, transport, energy, leisure and life generally over the plan period.</p> <p>10) Public engagement in the formulation of the plan and its implementation.</p> <p>11) Can and should development control be improved?</p> <p>12) Appropriate response to climate change, such as measures to reduce flooding and improve flood resilience.</p> <p>Ormskirk Community Partnership supports the proposal for a longer Plan period, if it will deliver the suggested benefits and provided that it does not make the preparation of the plan longer and more cumbersome.</p> <p>We look forward to contributing to the next stage of your consultations in due course.</p>	
11.	Ian Davis	New Ormskirk Residents Group	<p>We understand that Local Groups were contacted in September with a view to making some initial comments regarding the scope of the review and we note from information on the council's website that consultation will include bodies and organisations with specific interest in Local plan topics.</p> <p>New Ormskirk Residents Group (NORG) is purely non-political (unlike some local groups, we do not have local serving councillors as members attending meetings on a regular basis) and our members are local residents from all across the three Ormskirk Town Wards.</p>	<p>Comments Noted.</p> <p>The Council will consider the comments carefully as the Local Plan is prepared.</p>

	Name	Organisation	Comments	Response
			<ol style="list-style-type: none"> 1. Ormskirk Town Centre – to be a thriving retail and service centre, attracting both local residents and from further afield. A concentration on the appearance of buildings and open areas. 2. Transport – concentration on measures both to keep traffic moving in, around and through Ormskirk and also provision of parking. 3. Housing – which meets the needs of all sections of the local population and to address demographic imbalance in certain areas. Also to give emphasis to the provision of ‘starter homes’ for local young people and young families. 4. Energy provision, especially with regards to potential sites for fracking. 5. Edge Hill University - the impact of a growing campus and student number on local services, local residents, car traffic/parking . local housing needs. 6. Green Belt protection. 7. Measures to address flood risk. <p>We look forward to contributing in the New Year to the next and subsequent stages of consultation.</p>	
12.	Stuart Barnes	Sefton MBC	<p>Sefton Council and West Lancashire District Council have a history of enjoying a close working relationship and of positive cross-boundary working and we look forward to this relationship continuing over the foreseeable future as we both to continue to meet the Duty to Co-operate requirements in relation to addressing cross-boundary and sub-regional issues.</p> <p>In have the following comments to make on potential cross-boundary issues.</p>	<p>Comments noted.</p> <p>The Council will continue to work with neighbouring authorities through the duty to cooperate requirements and are actively working on a joint SHELMA with the Liverpool City Region.</p>

	Name	Organisation	Comments	Response
			<p>Employment land, Port and housing related needs West Lancs and Sefton are both involved in the sub-regional strategic housing and employment study (SHELMA). This will identify the employment, housing and Port-related needs for Merseyside. It is important that West Lancashire continue to work with the rest of the Liverpool City Region to identify how sub-regional port and general employment needs are met and that the WLLPR reflects this work and actively looks to identify sites within West Lancashire to do this.</p> <p>Likewise if there are sites proposed that are close to the Sefton boundary, consideration will need to be made in how much they can contribute towards meeting existing and future housing needs arising in Sefton. Consideration will also need to be given to minimising the impact of any development near the Sefton boundary upon Sefton residents.</p> <p>Sefton Council is happy to offer comments and/or assistance on any site selection methodology.</p> <p>Infrastructure If the WLLPR proposes new development near to its boundary with Sefton, consideration will need to be given to the impact that such development may have on the infrastructure and services within Sefton, and how that development can contribute (eg by way of a financial contribution) towards meeting the cost of any infrastructure requirements that may be in Sefton's infrastructure. This infrastructure might include transport, school, utilities, parks and open spaces and flood protection measures. This potentially could be done through</p>	

	Name	Organisation	Comments	Response
			<p>Community Infrastructure Levy or for off-site payments. Again Sefton Council is happy to discuss this further and work with West Lancashire on this issue.</p> <p>Transport It is hoped that the West Lancashire Local Plan review will continue to promote the provision of improved transport links linking Southport and Formby to the motorway network via Ormskirk and also to improve the rail links through Burscough, specifically the East-West line to Wigan and Manchester and the possible reinstatement of the "Burscough curves" as these issues are likely to benefit both Sefton and West Lancashire.</p> <p>We look forward to viewing the "issues and options" paper in 2017 with a view to making more detailed comments.</p>	
13.	Elizabeth-Anne Broad	Parbold Parish Council	<p>Strategic Policies: Parbold Parish Council objects strongly to the release of Green Belt land anywhere but especially within Parbold Parish, there are more than enough Brown field sites for housing and employment purposes in the borough. Especially here in Parbold as the Green Belt is above the flood plain and we really do not need any more flooding.</p> <p>Residential Policies: At the last review the recommendation was for up to ten houses. With the last four going up surely we have reached their target over the years? We think with the flooding we have done enough.</p> <p>We think the term of the plan should be 20 years.</p>	<p>Comments noted.</p> <p>The need for the release of Green Belt land will depend on the scale and broad location of new development that the Local Plan ultimately identifies.</p> <p>Flooding and the risk of flooding through the impact of new development will be assessed through a Strategic flood Risk Assessment.</p>

	Name	Organisation	Comments	Response
14.	C A Cross	Wrightington Parish Council	<p>The Parish Council has recently had the opportunity to look at the policy areas and their scope in the letter received and broadly agree with the proposed areas to be reviewed.</p> <p>The Parish Council are particularly keen to ensure that as much protection is given to the Green Belt in Rural Areas as possible and are therefore of the opinion that a Local Plan effective for a longer period of time could be more beneficial in safeguarding terms and would give West Lancashire residents more confidence in long term Planning Policy.</p>	<p>Comments noted.</p> <p>The need for the release of Green Belt land will depend on the scale and broad location of new development that the Local Plan ultimately identifies.</p>
15.	Kate Wheeler	Natural England	<p>Planning policies should take a strategic approach to the conservation, enhancement and restoration of geodiversity, and promote opportunities for the incorporation of geodiversity interest as part of development.</p> <p>Local authorities should ensure that appropriate weight is attached to the geodiversity interest of designated sites as well as geodiversity interests within the wider environment, and maximise opportunities to include geodiversity in and around developments as part of the design process. Further information on geodiversity is available on Natural England's website.</p> <p>Natural England is in agreement that West Lancashire's natural assets need to be protected, conserved and enhanced and that this should be a key issue in the Local Plan. Natural England would expect biodiversity and geodiversity, soils, priority habitats, ecological networks, protected species to be covered under the heading of the natural environment. Please see the appendix below for further information on these topics.</p>	<p>Comments Noted.</p> <p>An overarching topic in the scoping of the Local Plan Review focuses on the natural environment and this will be pulled through in the development of the Local Plan.</p>

	Name	Organisation	Comments	Response
16.	Robert Deanwood	National Grid	<p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. 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 our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.</p>	Comments Noted.
17.	Fiona Pudge	Sport England	<p>Sport England has no view on the timescale of the Local Plan because all of our areas of work operate within a 5 year time period. However, there are some key areas that we would like to see included within the Plan:</p> <p><u>Protection of Playing Fields and Pitches</u></p> <p>This is a key area for Sport England as we are a statutory consultee on all planning applications that affect or prejudice the use of playing fields. We would like to see a specific policy that affords protection and enhancement to existing playing fields in line with paragraph 74 of NPPF and Sport England's Playing Fields Policy.</p> <p>We would not support a policy stance that recommends qualitative improvements to mitigate a loss because the current Playing Pitch</p>	<p>Comments Noted.</p> <p>Playing Pitch Strategy/Open Space Review and Leisure Strategy will form part of the evidence base for the Local Plan Review.</p> <p>What CIL and S106 monies should be spent on is not part of the scope of a Local Plan, but a separate matter relating to the Regulation 123 list.</p>

	Name	Organisation	Comments	Response
			<p>Strategy shows there are deficiencies across most pitch types. This means the playing field land must be protected/replaced. Both NPPF and Sport England Policy require an equivalent or better quantity (playing field) and quality (pitch) replacement. Qualitative improvements to existing playing field in cases where a housing development demonstrates it will generate additional demand for sport. In that case a developer contribution can be secured to improve an existing playing field using the Playing Pitch Strategy Action Plan as a guide.</p> <p><u>Provision of New Playing Field/Pitches and Sports Facilities Associated with Population and Housing Growth</u></p> <p>Housing growth generates additional demand for sport and places pressure on existing facilities. Both the Playing Pitch Strategy (PPS) and Sport Built Facilities Strategy, if one has been undertaken contains assessments of future demand. Since the current PPS was adopted Sport England has developed a New Development Calculator which uses data from the PPS and either individual housing site figures or total housing growth figures to estimate the demand for individual types of pitch sport. Using Sport England's quarterly Facilities Costs an estimate of the cost of providing those works is also generated. This information can then be used as a starting point to negotiate an appropriate developer contribution for individual sites or a collection of sites. Please contact me if you would like to discuss how this works in practice as this is now being used instead of local standards.</p> <p>Please note Sport England would object to any policy that develops standards for pitch provision. This is because local standards do not reflect the demand characteristics for each pitch type and often results in isolated single pitch sites that do not contribute to the supply of pitches. These areas often become informal kick about</p>	

	Name	Organisation	Comments	Response
			<p>areas or informal open space. As an example other open space typologies unit of demand is one person. However, the unit of demand for a pitch is a team and those teams type and size varies from sport to sport e.g 5 a side football pitch would be ten people, whereas a senior rugby union pitch would be 30 people. The provision of new pitches must be clearly linked to the demand for pitches in that area. For example, the New Development Calculator and PPS will be able to inform whether the additional demand is likely to be for cricket rather than football.</p> <p>For built sports facilities the Council can use a combination of the Built Facilities Strategy and Sports Facility Calculator with the same principles applying to calculating and delivering built facilities as pitches.</p> <p><u>Physical Activity and Design</u></p> <p>Sport England has a new strategy called Towards an Active Nation which now has a focus on getting more people physically active irrespective of age and ability. To that end Sport England has produced a guide in partnership with Public Health England called Active Design which sets out ten key principles to designing the environment to create more opportunities for physical activity. The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.</p> <p><u>Evidence Base</u></p> <p>The relevant sport related evidence base documents to help inform planning policy are the Playing Pitch Strategy and Sport Built Facilities Strategy (or similar). These two strategies contain the Needs Assessment required by paragraph 73 of NPPF.</p>	

	Name	Organisation	Comments	Response
			<p>1. Playing Pitch Strategy – this was a Strategy undertaken by the Council in partnership with Sport England and the pitch sport national governing bodies. The PPS was finalised by Consultants mid 2015 and Sport England highlighted two key outstanding pieces of work that needed to be finalised. The first was a monitoring and review procedure to be agreed by the Steering Group and included within the Strategy. The second was to ensure the PPS is adopted. I have not seen a Monitoring and Review procedure and I am not aware of it having been adopted by the Council. I’m aware a public consultation was carried out November 2015 but I have not been informed of progress. It should be noted that although the Council wish the PPS to have a 10 year lifespan that is only possible if the baseline data is kept regularly up to date. This is because the demand and supply of pitches fluctuates on a seasonal basis and any major changes within one season could affect the associated policies. I would be happy to discuss this aspect with the Council especially as Sport England has not formally signed off the PPS as being complete. It should be noted the PPS contained within the Evidence and Research section of the planning policy webpage is the out dated 2009 strategy. This should be amended to the current 2015 PPS.</p> <p>2. Leisure Strategy – I have not seen a copy of this so cannot ascertain whether it contains the appropriate needs assessment required to establish needs and opportunities to underpin planning policy. I am unable to locate a copy on the Councils website and I would appreciate a copy. This strategy will also need to be included within the Evidence and Research section of the planning policy page.</p>	

	Name	Organisation	Comments	Response
			<p>3. I note the out of date 2008 Open Space Study is contained on the Evidence and Research page of the planning policy section. This should be removed as the baseline data and assessment is too out of date to help inform planning policy. If a more up to date Open Space Study has been undertaken this should be used instead.</p> <p><u>CIL/S106</u></p> <p>Experience, training and legal advice suggests to Sport England that the following three guidelines should apply:</p> <ol style="list-style-type: none"> 1. CIL should specifically exclude any mitigation measures required to make a development proposal satisfactory in planning terms, e.g. if housing is proposed on playing field the mitigation for that loss under NPPF Para 74 should be dealt with OUTSIDE of CIL. 2. CIL 123 lists should only include defined projects and not use generic statements such as 'Indoor Sports Provision' and 'Outdoor Sports Provision'. Our understanding of the legal position is that where a generic statement is used for a facility type then all provision is caught within CIL and therefore none can be delivered via S106 (to avoid double dipping). Whilst there is some clarity re. what S106 will cover (providing clarity in those instances only) the fact that no projects have been listed under the CIL column for CIL funding will mean all outdoor sports projects not listed in the S106 column will by default be expected to be funded by CIL therefore the LA will be prevented from seeking S106 funding for anything other than clear mitigation on those sites listed. Sport England therefore 	

	Name	Organisation	Comments	Response
			<p>suggests the CIL column is revised in terms of both Indoor and Outdoor Sports Provision to include ONLY SPECIFIC PROJECTS THAT CAN REASONABLY BE FUNDED THROUGH CIL.</p> <p>3. CIL 123 lists should be kept to a list of major key priority projects and not seek to deliver all infrastructure. These projects should be the big ticket items where S106 pooling restrictions prevent S106 agreements being a practical tool and where CIL receipts are sufficient to deliver within a reasonable timescale. The project list should exclude smaller projects/improvement schemes that are simpler/quicker/more enforceable for developers/LAs to deliver on or off site via S106 agreements where delivery can become a planning requirement.</p> <p>Sport England therefore recommends:</p> <p>1. The CIL list includes specific projects for sport facilities (indoor and/or outdoor) and not generic statements.</p> <p>2. The statement clarifies that:</p> <p>a. Mitigation for loss under NPPF Para 74 falls OUTSIDE of CIL</p> <p>b. Clarification that S106 agreements will be used to secure new sports facilities needed to meet new demand arising from development for sports facilities (indoor and outdoor) where not already sought through the CIL (e.g. CIL may be used to fund a new leisure centre to meet growth in demand for swimming pool BUT S106's would be used to fund all outdoor sport).</p>	

	Name	Organisation	Comments	Response
18.	Tom Houghton	Scarisbrick Parish Council	<p>The Local Plan review was discussed at the November Parish Council meeting and a precise of the points raised are itemised below-</p> <p>1 Approximately 91% of the land in the Borough is Green belt. The present plan does not seem to make much mention of this and maybe that can be addressed in the review. There is a perception that developers 'park' land agreed for development leaving undue pressure on planners to consider allowing development on hitherto green belt.</p> <p>2 A revision of the housing allocation should be undertaken in any new plan. The pertinent question in Scarisbrick is what can be deemed as 'affordable' housing. Recent developments are priced way outside of the budget for local people to buy - and in particular younger Scarisbrick residents who may be first time buyers.</p> <p>3 The Rural economy - the last study dates back to 2006 and is felt to be out of date and as such needs re visiting.</p> <p>4 Flood Risk - Any review should have a formal policy - particularly relevant after the flooding of 2015 and the ongoing risk of the satellite pumping stations being closed.</p> <p>Hopefully these points can be considered as the new local plan is prepared.</p>	<p>Comments Noted.</p> <p>The need for the release of Green Belt land will depend on the scale and broad location of new development that the Local Plan ultimately identifies.</p> <p>The Matters of affordable housing, the rural economy and flood risk will all be carefully considered and the subject of appropriate planning policies through the preparation of the Local Plan.</p>