

Scrutiny of Housing & Employment Land Need

Review and comment on West Lancashire Local Plan Review (WLLPR), Technical Paper 1.

This paper has been produced by a local resident and member of an informal steering group we established. It is their assessment of Technical Paper 1 (available at www.westlancs.gov.uk/lpr) not a professional assessment. It is offered to help residents in making representations.

In preparing this review of the above paper, I have referenced each point in line with the paragraph numbering used in the document so that each point can be cross referenced more readily.

The paper is dated September 2018, even though the document was only made available to Councillors and the public on the 8th October 2018. This earlier date implies the Technical Paper 1 was prepared before the Preferred Options document was published and approved by Cabinet. (11th September 2018).

2.4. Acknowledges that at the time of writing the paper, the precise calculation to be used in the future has not yet been confirmed, which by definition means that dated principles are being used which are not based on up to date figures. This supports the premise that the review and draft local plan are premature in their timing.

2.5. Numbers confirm that the adopted Local Plan already significantly exceeds the LHN defined by Government (324 to 212). The further uplift to 475 is therefore indicative that the draft Local Plan is not satisfying evidenced local needs.

2.6 This clearly articulates that additional uplift is included for the SUCCESSFUL implementation of the Skelmersdale rail link and for the large-scale B8 use. In both cases the basis for this uplift is unfounded.

Regarding the Rail link, the supporting Sustainability Assessment, clause 8.3.5 confirms that there is currently no business case to support this, and for B8 use it has only been determined at the LCR level, and has not been disaggregated to Local Authority Level.

2.7 The uplift of 48 dwellings is predicated on the delivery of the Rail link, which has already been indicated as having no business case. It would appear by adding in the full housing need from the outset of a new plan, that the increase in housing is being used to help justify the need for rail station. Surely this is putting the horse before the cart.

When the new town was approved in the 60's it was designed for 90,000 residents and even at this time the need for a rail link was not considered necessary or viable. With only c40,000 residents at present, even using full growth projections will not sufficient growth to justify the investment in a rail link. It is inappropriate to release Green Belt at this time, for a project that is highly unlikely to

materialise in the lifetime of the Local Plan. Even if it were possible then the growth would not be necessary in the foreseeable future and can be dealt with through an appropriate review of the Plan.

Even though the share of large-scale B8 use has NOT been defined, the preferred options plan uses the maximum number of dwellings (96). Again this places an unnecessary burden to release Green Belt land for unsubstantiated figures.

2.13 The selective quoting and interpretation of the NPPF in this clause undermines the key principles of the Green Belt which the NPPF fully endorses. By releasing land that is not adjacent to existing residential boundaries and areas that are in excess of evidenced local need, the incursion into the Green Belt is inappropriate and will lead to greater challenge from Developers to infill on land that is marginalised and which will become increasingly uneconomic to farm.

Should it not be argued that the best way to protect and preserve Green Belt is to only release it as the need is evidenced and real. Once the Green Belt is removed, Developers will move on the greenfield areas and the Planning department will have no grounds on which to sequence or control construction.

2.15 1) The Council acknowledges that safeguarding land provides no certainty to protecting the Green Belt. If protection is the stated aim of the Council, then it must be counter-productive to remove unnecessarily large areas from Green Belt and hence lose the planning protections that Green Belt affords.

2.15 2) There is no evidence to support the premise that increasing land supply will bring land values down. Opening up large greenfield sites for development will enable developers to cherry pick the most lucrative locations which will continue to be the most prized and competitive sites.

The aim of reducing land values is also counter to other council policies to develop Brownfield sites. It would not necessarily result in lower cost, or more affordable housing and would adversely impact on the viability of Brownfield development in favour of Greenfield exploitation.

2.20 In acknowledging that the job growth-based forecasts are not accurate for determining business space, it does not follow that the Completions Trend estimates provide the more cautious approach. Surely in projecting the need for 3 times the amount of land this is an overstatement of need.

When this is further extrapolated beyond 2037 to 2050, this adds a further fictitious requirement that is not representative of evidenced need.

There has not been any rationale presented for the release of Employment land ahead of evidenced need. Whilst Housing is driven Government Policy objectives, there is no equivalent policy justifying the use of Green Belt land for speculative growth.

2.21 This is the first indication of the excessive removal of Green Belt to provide Employment Land. There is no rationale as to why the higher figure of 397ha should be the basis for the Preferred Option Local Plan. To use the lower projection of 308 and to share equally between the 7 authorities in the SHELMA would result in a maximum requirement of 44ha, well below that presented as necessary in the Local Plan, and which can be delivered from existing Brownfield sites without the need to release Green Belt.

2.22 The figures quoted in the SHELMA and additional work commissioned by LCR demonstrate that there is no proven case for additional employment land for B8 use. There is a potential for 549ha and a need for 397ha with 295ha already in the process of being delivered.

The inclusion of additional sites in West Lancs above that already available on Brownfield sites is pure speculation and is not based on accurate or available evidence. To extrapolate this into a requirement beyond 2037 is also highly speculative and is not a sound basis for arguing the removal of BMV land from the Green Belt when it is actively being used to grow arable crops to feed the populace.

Removal of this land from the Green Belt for Employment use at this time would result in the early exploitation by developers and will remove the pressure to deliver Brownfield sites closer to Liverpool Super port. Should the demand for B8 be proven beyond 2037 this would better be serviced by a review of the Local Plan closer to this timeline, thereby enabling the land to be continue to be farmed for the benefit of the Nation.

2.24 Provides further evidence that requirement to provide land for B8 employment land is not evidenced based in so far that further work is still to be commissioned to identify potential locations within the LCR and that sites that may be suitable are not being promoted for accommodating large-scale B8. Simply put, if they are not promoting existing sites then it is because there is no market for it.

There is also a recognition in bullet point 3 that 'Switch Island is already extremely congested' and has been used as a factor in discounting the available land around Switch Island. Has it escaped the Councils logic that all traffic leaving the Super port to a potential location of J3 on the M58 will ALL have to pass through Switch Island?

2.27 Despite the fact that there is no proven case for increasing Employment Land, the Council exacerbate the issue by making a further step jump in requirement from 2.4ha pa to 5ha pa i.e. more than double.

There is also no evidence base to support the case for growth to continue at the same rate beyond 2037, when the port of Liverpool will be operating at or around its maximum capacity.

2.29 With the LHN figure indicating a need for 212 dwellings pa in West Lancs and the current plan set to deliver 324, it is not the case that supply is already exceeding requirements and should the Review not seek to reduce the annual build to reflect actual need.

Table 2 in section 2.29 also indicates that Local Plan requirements to 2027-33 across the 7 authorities is already in excess of the SHELMA OAN. The table also shows that only Wirral is indicating a deficit on housing provision up to 2028. The WLBC preferred option to increase this to 475 and to extrapolate need beyond all neighbouring authorities is unsubstantiated and not based on evidence.

2.32 Seems to offer a conclusion that "it would not be appropriate to provide an additional housing growth uplift on top of the LHN calculation for housing need post 2027".

2.33 The Skelmersdale Rail link is declared as central to transport plans in WL and yet the Sustainability Assessment 8.3.5 declares that there is no proven business case for this to be adopted in the foreseeable future. The uplift of 48 dwellings pa is therefore unwarranted until such time as the

station is actually built and not wished for. Even then the uplift should not be targeted in areas that are more than walk to distance to the station. Where the necessity arises to commute to the station, then commuters will surely continue to travel to stations on the Ormskirk-Liverpool line which offers better direct access to the City.

2.34 Confirms that the SHELMA did not project any significant growth in the warehousing sector for WL. So the unsubstantiated projections for job growth through the release of additional Employment Land creates a false demand for 72 dwellings pa. Even the 72 is excessive in terms of the proposed B8 use, with 1 employee per household resulting in a projected 25 jobs/ha, which is far in excess of the norm for large-scale B8 warehousing.

2.39 Confirms that Sefton WILL have land to meet its needs well into the 2030s at least. Is it therefore appropriate that WL should be anticipating Sefton's future needs beyond their own planning cycle?

2.47 Back to the rail link!! The claim that the link services commuters to both Manchester and Liverpool, and will therefore attract people to live in Skelmersdale/WL is a fallacy.

Firstly, the line to which the link would connect goes to Kirkby and Wigan necessitating connections for onward journeys to both cities.

Secondly, the New Town has demonstrably proven that it has failed to attract people to live there. Whilst there may be some who live in Skelmersdale who do commute to both cities, there is a low likelihood that the town will be capable of attracting new residents when there are more attractive areas from which to commute, many of which are in development outside of our borough.

2.48 The statement in this section basically confirms that the WLBC preferred Option draft plan is by definition contrary to the SHELMA and is therefore not evidenced-based, a pre-requisite for removing land from the Green Belt.

2.51 Surely it is only the over-inflated housing and employment land figures that lead to the necessity to remove land from the Green Belt. Furthermore, any need to remove Green Belt at all should be explored in the first instance, where it abuts an existing residential or employment land boundary.

Further in this section it quotes NPPF in respect of Green Belt, that before concluding that exceptional circumstances exist to justify any changes, it must demonstrate that it has examined fully all other reasonable options for meeting ITS identified need. i.e. NOT the unmet needs of others. Yes, there may be a need to cooperate with other areas but not to justify the unnecessary removal of Grade 1, Green Belt.

3.32 Table 6

Is there a double count in lines 1 and 2? Does the LHN figure not already include the housing requirement being delivered in the current Local Plan

Should the remaining unmet housing need in line 4 not be distributed in the same ratios as used in line 1?

5.2 raises the question as to whether the deliverables at the end of the proposed plan are realistic. When you compare the elevated housing requirement to that being achieved through the current

plan, there is surely evidence that says the increased level of build would be unrealistic and is not consistent with local needs.

There is also no evidence to support that increasing growth rates are sustainable as there is insufficient capacity in building trades and materials supply as evidenced by the increasing import levels of core materials such as bricks.

5.4 The fact that there has been an acknowledged lull in completions between 2012-2018 there is no evidence to suggest that this has resulted in a shortage of housing to meet local needs. Indeed, new builds are remaining empty for longer and without the Developers' house exchange schemes, there would be an inevitable increase in vacancy rates in completed properties

The lull must also reflect the available capacity to deliver the numbers, both in term of resources and demand. Higher numbers pa will therefore lead to greater potential for land banking, a practice that is being criticised by Government and which leads to an inflation in land prices and not a reduction as forecast earlier.

5.10 bullet 3 - confesses that a large part of the basis for providing the Garden Villages is to meet the unmet need arising in Sefton. This unmet need has not been proven post 2030 and is based purely on estimates and extrapolation. It is not also an affront to the residents of West Lancashire that the people of Sefton will benefit most from the protection of Green Belt in their area at the expense of the Green Belt in West Lancashire.

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