

A Local Plan for Sefton Preferred Option

Sustainability Report

July 2013

Sefton Local Plan

Sustainability Appraisal Report

Section One Introduction

1.1 In September 2004, the Planning and Compulsory Purchase Act came into effect and introduced the requirement for Sefton Council to replace its existing land use development plan – the Unitary Development Plan (UDP). Whilst the Localism Act and the recent publication of the National Planning Policy Framework have resulted in a number of significant changes to the planning system, there is a continued requirement for Sefton Council to produce a Local Plan to replace its existing UDP.

1.2 The Local Plan will outline the Council's vision for Sefton up to the year 2030, and will set out the strategic framework to promote, guide and manage future growth and development in the Borough. Accordingly, it will make important choices about how and where new development will take place and establish an appropriate balance between growth, regeneration and environmental protection/improvement.

1.3 The Local Plan should compliment other Council and Partner Plans and Programmes. A summary of these is provided in Appendix A.

1.4 Sustainable development is the core principle underpinning the planning system and, as a consequence, sustainability will be at the heart of the Local Plan. In order to ensure that new plans and strategies contribute towards sustainable development, the Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) to be carried out on all new or revised Local Plans. SA seeks to promote sustainable development through the integration of sustainability considerations into the preparation, adoption and implementation of plans and strategies. It involves the identification and evaluation of the social, environmental and economic impacts of a plan, offers an opportunity to consider ways in which a plan can make an effective contribution to sustainable development and provides a means of avoiding or reducing any adverse effects that the plan might have.

1.5 The purpose of this SA is to promote sustainable development through the integration of sustainability considerations into the preparation, adoption and implementation of the Local Plan. SA does not constitute a separate stage in the production of the Local Plan but instead represents an on-going process that forms an integral part of the plan-making process. In doing so, it provides an opportunity to consider ways in which the Local Plan can make an effective contribution to sustainable development and provides a means of avoiding or reducing any adverse effects that the plan might have.

1.6 It should be noted that the Sustainability Appraisal of the Local Plan Preferred Options was a tool to help inform decision making by Sefton Council. The role of Sustainability Appraisal was to highlight sustainability implications of each option, and potential development sites, rather than being the sole decision making tool for deciding which

option should be chosen. There are wider influences that will also be taken into account, such as national planning guidance, other guidance and evidence, other Council priorities and landowners intentions.

1.7 This report outlines the findings of the SA of Sefton's Local Plan Preferred Options report. It appraises the Local Plan against baseline data and sustainability objectives in order to assess the plan's impact on economic, social and environmental aims. It is being published for consultation alongside the Local Plan Preferred Options report to provide the public, statutory consultees and other stakeholders with an opportunity to express opinions on this report and also to use it as a reference point whilst commenting on the Local Plan Preferred Options report. This is first opportunity that the sustainability report is being published for comment and responses will be considered in the final sustainability report which will be prepared to support the publication of the Local Plan for submission.

Requirement for SA / SEA

1.8 In parallel with the need to undertake an SA, the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the Strategic Environmental Assessment or 'SEA Directive'), which is transposed into United Kingdom law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations'), introduced a statutory obligation to conduct an environmental assessment of certain plans. The Regulations apply to a range of UK plans and programmes prepared by public bodies, including Sefton's Local Plan which meets the relevant criteria in that:

- It is "prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and is required by legislative, regulatory or administrative provisions" (Article 2(b)); and
- It concerns "town and country planning or land use... which sets the framework for future development consent of projects" (Article 5.2(a)).

1.9 While SA and SEA are distinct processes, many of their requirements overlap. As a consequence, the Government has prepared guidance which advises that an integrated approach to SA and SEA should be pursued, so that the SA process also meets the requirements of the SEA Directive and Regulations. This involves extending the breadth of (predominantly environmental) issues required to be considered under SEA to cover the full range of aspects (including social and economic) for sustainability.

1.10 In accordance with this guidance, this SA Report meets the SEA requirements, and acts as the 'environmental report' for the purposes of Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004. Throughout this report, all references to SA must be taken to include the requirements of European Directive 2001/42/EC.

1.11 The following table shows how this report meets the specific requirements of the SEA Directive.

Table 1: Compliance with the SEA Directive

Information to be included in an Environmental Report under the SEA regulations	Relevant Sections of the Environmental Report
an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Section 3 and Appendix B
the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	The Sustainability Appraisal Scoping Report and Appendix C
the environmental characteristics of areas likely to be significantly affected;	The Sustainability Appraisal Scoping Report and Appendix C Section 5
any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The Sustainability Appraisal Scoping Report and Appendix C
the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	The Sustainability Appraisal Scoping Report and Appendix B
the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the	Sections Three to Six

interrelationship between the above factors;	
the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section Six
an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section Three - Six
a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section Seven
a non-technical summary of the information provided under the above headings.	Non technical summary

Section 2

Methodology

Overall Approach

2.1 The approach adopted to undertake the SA was based on the process set out in the Office of the Deputy Prime Minister (ODPM) Guidance Paper “Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents” November 2005. This guidance advocates the following process to undertaking SA:

SA Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
SA Stage B: Developing and refining options and assessing effects
SA Stage C: Preparing the Sustainability Appraisal Report
SA Stage D: Consulting on the preferred options of the Local Plan and the Sustainability Appraisal Report
SA Stage E: Monitoring the significant effects of implementing the Local Plan

Stage A – Setting the Scope

2.2 Sefton Council undertook the first stage (Stage A), identifying the initial scope of the SA, in February 2009 [i.e. a Scoping Report]. In conjunction with key stakeholders, the Council identified and reviewed other relevant plans, policies and programmes that will affect and influence the Local Plan; set out relevant social, environmental and economic baseline information; identified the key sustainability issues for the SA to address; established an SA Framework consisting of sustainability objectives and indicators; and produced a Scoping Report for consultation on the scope of the appraisal.

Other relevant plans, policies and programmes that will affect and influence the Local Plan

2.3 The Scoping Report considered a whole range of documents that set out objectives that are relevant to the Local Plan and sustainability. These are summarised in Appendix B.

Set out relevant social, environmental and economic baseline information

2.4 The Scoping Report looked at the current state of the Environment in Sefton [in its widest sense]. A full summary of this task is provided in Appendix C. Some of the key messages coming from this task were:

- High levels of unemployment in Sefton, particularly in wards in South Sefton and amongst younger people. Lack of suitable skills and a need to match skills to jobs.

- Over reliance on the public sector for jobs making Sefton susceptible to cuts in public sector spending. Fewer jobs per population than many other areas. Lack of land for employment development.
- Many parts of Sefton's countryside is graded best and most versatile agricultural land.
- Many of Sefton's local and district centres are currently struggling with high vacancy rates and a poor range of services and shops.
- The perception with many residents is that infrastructure provision has not kept up with past development and that this has caused problems with drains, roads, power supply etc. Many types of existing infrastructure are at capacity, need upgrading and would struggle with additional development.
- There are inequalities between many parts of Sefton, with many areas, particularly in south Sefton, identified as areas of deprivation. Many areas are in need of regeneration, in terms of the physical environment but also social and economic too.
- Crime and the fear of crime are major obstacles in the regeneration of local neighbourhoods. Crime in some wards is much higher than in others.
- There is a high affordable housing need in many parts of the borough. Many areas of Sefton have a lack of choice in the variety of homes, in terms of size, tenure and quality.
- There are some areas, communities and groups of people that have restricted access to services and facilities. Sefton's population has decreased over the past 30 to 40 years, resulting in many services being closed or put under pressure. Sefton has an older population than many other parts of the region putting pressure on services. Despite good public transport links, many people still choose to travel by car for commuting. This adds to congestion on many of Sefton's roads.
- There are inequalities in health [including mental health] between different parts of the borough. Sefton has high levels of obesity and many people lead inactive lifestyles.
- There is a lot of scope to improve the way people engage with the plan making process and become more involved with the decision making process overall.
- Climate change action should be taken at the local level. Although carbon dioxide emissions have been decreasing in recent years, more work is needed to meet the government's commitments.
- Large areas of Sefton are at risk from flooding. Surface water flooding is also an issue in many parts of Sefton.

- There is legacy of heavy industry in Sefton with many areas having suspected high levels of contamination. There are a number of Air Quality Management Areas in Sefton. The water quality of Sefton's rivers needs improving.
- The amount of waste recycled in Sefton has increased significantly in recent years. However, Councils must continue to reduce the amount of waste sent to landfill. Energy use has decreased in recent times and should continue to do so in the future.
- Sefton has large areas of coast and countryside that provide many benefits. Many of these sites are under pressure from development and increased visitor numbers.
- Planning should encourage effective use of land by using land that has been previously developed. There are high levels of vacant homes in some areas.
- Sefton has many areas with biodiversity and habitat value.
- Sefton has many heritage assets. Local heritage and culture help give people a sense of pride in their neighbourhood, helps to define the unique character of distinctive places and can play a big role in regenerating an area. In some instances there is a lack of information on the location and importance of our heritage assets.
- Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Established an SA Framework consisting of sustainability objectives and indicators;

2.5 Following from the previous tasks a Sustainability Framework was developed. This is provided at Appendix D. A list of the objectives from the framework is provided below.

2.6 The Scoping Report was updated in December 2012 to take account of changes to data since 2009, the new planning framework and other guidance and comments made during the consultation undertaken during summer 2011. The updated Scoping Report was sent to the Environment Agency, English Heritage and Natural England [i.e. the three statutory 'environmental bodies'] for comment. The Scoping Report has been finalised and can be viewed at www.sefton.gov.uk/sustainabilityappraisal [from July 2013].

2.7 The Scoping Report has identified twenty sustainable development objectives were established for appraising the Local Plan. The establishment of SA objectives is central to the SA process. The SA framework, based on these objectives provides a way in which sustainability effects are described, assessed and compared. Sustainability objectives are distinct from the objectives of the Local Plan.

2.8 The twenty SA objectives [including how these match to the SEA topics¹] are:

Sustainability Objective
1. Encourage economic growth and investment SEA Topics: Population, Material Assets
2. Reduce unemployment and improve skills SEA Topics: Population
3. Support the rural economy SEA Topics: Population, Material Assets
4. Maintain vibrant town, local and village centres SEA Topics: Population, Material Assets, Cultural Assets
5. Provide the required infrastructure to support growth SEA Topics: Population, Material Assets
6. Reduce inequalities and social deprivation SEA Topics: Population, Human Health
7. Reduce crime and improve safety SEA Topics: Population, Human Health
8. Meet Sefton’s diverse housing needs SEA Topics: Population, Material Assets, Human Health
9. Provide better access to services and facilities, particularly by walking, cycling and public transport SEA Topics: Population, Human Health, Material Assets, Air, Climatic Factors
10. Provide environments that improve health and social care SEA Topics: Population, Human Health, Material Assets
11. Strengthen communities and help people to be involved in local-decision making

¹ The Strategic Environmental Assessment [SEA] Directive [Annex 1(f)] sets out the topics that should be considered as part of the Environmental Report

Sustainability Objective
SEA Topics: Population
12. Adapt and mitigate to climate change SEA Topics: Climatic Factors, biodiversity, fauna, flora, soil, water, air
13. Reduce the risk from flooding SEA Topics: Climatic factors, Human Health, Material Assets, water
14. Reduce pollution SEA Topics: Biodiversity, Fauna, Flora, Human Health, soil, water, air
15. Reduce waste and the use of natural resources EA Topics: Climatic Factors, Material Assets
16. Protect Sefton's valued landscape, coast and countryside SEA Topics: Biodiversity Fauna, Flora, Material Assets, Cultural Heritage, Landscape
17. Bring back into use derelict and underused land and buildings SEA Topics: Material Assets
18. Protect and enhance biodiversity SEA Topics: Biodiversity, Fauna, Flora
19. Protect and enhance Sefton's culture and heritage SEA Topics: Cultural Heritage, Material Assets
20. Provide a quality living environment SEA Topics: Population

2.9 The sustainability objectives used for the SA of the Local Plan Preferred Options report were drawn from the sustainability issues identified through analysis of the baseline data and review of other plans and strategies set out in the SA Scoping Report. These objectives reflect Sefton's priorities for achieving a sustainable borough and cover a range of issues, for example relating to economic growth, reducing unemployment, housing, social deprivation, health, crime, climate change, biodiversity, air quality, water quality, landscape and heritage.

Stages B, C, D and E

2.10 This report is broken down into a number of separate chapters which set out tasks which together meet stages B, C, D and E as set out above.

Chapter Three – assessing the draft vision and objectives of the Local Plan

Chapter Four – assessing the broad strategic options for the Local Plan

Chapter Five – assessing the different options for land in the Green Belt which would be needed for two of the broad strategic options for the Local Plan

Chapter Six – assessing the Preferred Option of the Local Plan as a whole

Chapter Seven – setting out the proposed monitoring for the sustainability appraisal

Chapter Eight – how to comment on this sustainability appraisal

Data Limitations/Technical Difficulties

2.11 The SEA Directive requires the identification of any difficulties encountered; these may include technical deficiencies or lack of knowledge. There were no significant technical difficulties encountered during the SA of the Local Plan Preferred Options. However, there were some areas of uncertainty (partly resulting from the strategic nature of the document) and evidence constraints particularly in terms of quantifying impacts. It is however acknowledged that it would not be reasonable to expect all of this information to be available at this stage in the planning process.

2.12 Some of the key limitations/difficulties at the time of undertaking the assessment included:

- Data has emerged at different times so it has been difficult to provide a 'snapshot' of the borough at a given time
- Many issues are not easily quantifiable and officer judgement has to be used in some cases.
- As this is a strategic document it is difficult to make an assessment of policies and site allocations without details proposals. The impact of a development will often not be able to be assessed until layout, building type, infrastructure improvements etc are known.
- Data is often difficult to find at the local level.

Section Three

Testing the Plans Vision and Objectives

Introduction

3.1 This section will look at the vision and strategic objectives for Sefton's Local Plan and test them against the 20 Sustainability Objectives. This helps to ensure that the Vision and Strategic Objectives of the Local Plan are consistent with the principles of sustainable development and enables conflicts and tensions between the objectives to be identified and recommendations made for their amendment or identify additions to them.

Vision

Sefton has successfully planned for and delivered sustainable development and growth across the borough, meeting the needs of its communities. At the same time it has retained and enhanced what makes it special – varied and distinctive communities living in an outstanding natural environment in a coastal location.

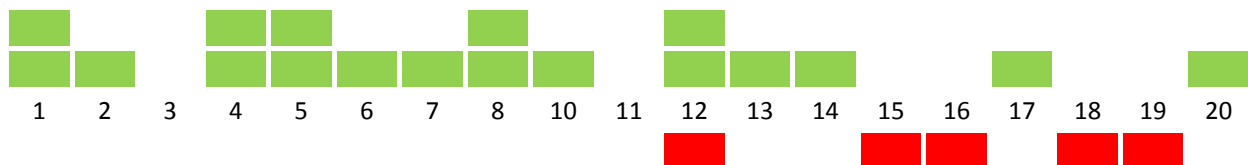
- New development is well designed and integrated into existing communities
- Important nature sites and heritage assets have generally been retained and enhanced
- New areas of green space have been created for both people and nature
- Sefton has made the best use of its land in meeting needs for homes, jobs and services, and many empty properties have been brought back into use
- Many of our older housing areas have been improved, the number of vacant homes has been reduced, and now provide a healthier and more attractive environment
- There is a wider selection of quality and affordable homes for all of Sefton's residents and this balance in provision has helped to stem the trend towards an increasingly ageing population.
- At the same time, more specialist accommodation has freed up larger homes for family use and progress has been made in meeting the needs of an ageing population.
- New homes have been located in areas with the lowest risk of flooding, and where necessary has been designed so that it reduces the overall risk of flooding. Local drainage has been improved
- Sefton has made the most of its assets to attract jobs and provide training for local residents. These assets include its coastal location and attractive environment, its position within the Liverpool City Region, the provision of new business/employment areas, and the skills of its population.
- The Port has expanded, providing more jobs for local people and helping to regenerate the communities closest to it. Access to the Port has been improved and this has been done in a way which has caused least harm to the local environment and communities.
- Infrastructure has improved as a result of development e.g. Brooms Cross Road [i.e. the Thornton by-pass], new links to the M58 and the new rail station at Maghull North.
- A more flexible approach to town and local centres has enabled them to withstand

major changes to retailing and to develop new roles

- Sefton is meeting the challenge of climate change by focusing on exploiting its potential to generate renewable energy; new homes and many existing homes now use energy more efficiently
- New homes, jobs and facilities have been balanced with protection of the environment and improved living conditions – this combination has helped to reduce deprivation.

3.2 As the vision is, by definition, an aspirational statement, it is unsurprising that it generally scores well in sustainability terms. The chart below shows that across many of the Sustainability Objectives the vision can be awarded positive scores, some of them wholly positive.

Figure 3.1 Testing the Local Plan Vision against the SA Objectives [numbers relate to SA objective as identified in Section 2]



3.3 The part of the Vision that may potentially cause conflict in sustainability terms is the section that addresses growth. These potentially could be in conflict with a number of environmental focused SA Objectives. However, the vision does try to balance the need for growth with that of protecting the best elements of Sefton’s environment. This explains why, in the chart above, that a number of SA Objectives achieve both a positive and negative score.

3.4 This exercise highlights an inherent issue in producing a Local Plan and balancing the needs of providing homes and jobs with those of protecting the environment.

Strategic Objectives

3.5 The Local Plan has 14 Strategic Objectives which set out how we intend to achieve the vision. These cover a range of issues and provide the framework for preparing the Local Plan policies. Figure 3.2 below sets out the 14 Local Plan Objectives [along the top of the chart] and tests them against the 20 SA Objectives [along the side].

The Local Plan Objectives are:

1. To support urban regeneration and priorities for investment in Sefton
2. To protect and enhance Sefton’s important natural environment and where possible create new environmental assets which are well connected to existing assets.

3. To protect and enhance the built environment of Sefton, with the emphasis on improving the quality of place.
4. To manage the effects of climate change, to encourage best use of resources and assets, land and buildings, and to reduce Sefton's carbon footprint.
5. To meet the diverse needs for homes, jobs, services and facilities, as far as possible close to where the needs arise.
6. To ensure that development is designed to a high quality, respects local character and historic assets and minimises impact on its surroundings.
7. To ensure new housing provision meets the diverse needs of a changing population, including affordable housing, special needs accommodation and family homes.
8. To enable people living in Sefton to live a healthy life, with access to leisure opportunities and in safe environments.
9. To make sure that new developments include the essential infrastructure, services and facilities that they require.
10. Improve access to services, facilities and jobs without having to depend on the car.
11. To support Sefton's town and local centres so they are able to adapt to local and wider needs for shopping, leisure, culture and other services, which contribute to making centres more viable.
12. To promote economic growth and jobs creation, a wider based economy in terms of job type, skills and the local labour supply, and support new and existing businesses.
13. To maximise the value of the Port to the local economy and jobs, while making sure that the impact on the environment and local communities is mitigated.
14. To work with our neighbours and partners to make sure Sefton contributes to, and benefits from, its place within the Liverpool City Region.

Compatible	
Some elements not compatible	
No clear relationship	

		Local Plan Strategic Objectives													
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
Sustainability Objectives	1														
	2														
	3														
	4														
	5														
	6														
	7														
	8														
	9														
	10														
	11														
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	14														
	15														
	16														
	17														
	18														
	19														
	20														

Figure 3.2 Testing the Local Plan Objectives against the SA Objectives

3.6 As with the Vision there are a number of areas that may be considered in potential conflict. This is inevitable for the plan that has such a wide remit. The areas that could be considered conflicting are generally those that promote development and growth [both in terms of jobs and homes] with those that seek to protect the environment and reduce climate change.

3.7 Economic growth and an increase in population will use more energy, generate more car journeys, require resources for new buildings and infrastructure and emit more carbon. The land required for this growth could also put pressure on land that has current value for recreation, flood alleviation, nature and agriculture.

3.8 The Local Plan objective that seeks to maximise the value of the Port has a number of potential areas of conflict, primarily due to the expected increase in traffic and industrial processes that currently occur at the port. This has had a negative impact in recent years on the local population [i.e. the Bootle and Seaforth areas] and the viewpoint will be that these problems may still be of concern.

Conclusions

3.9 As would be anticipated, a plan that covers such a diverse range of topics will inevitably have areas that would be considered in conflict. Economic growth and providing the homes and jobs that people need is unlikely to be provided without some impact on the environment. It is this tension that is fundamental to the Local Plan and Sustainability Appraisal processes. Through this process mitigation measures will be sought to help make sure the growth that we need can be met with limited impact on our environment.

Section Four

Testing the Local Plan Spatial Options

Introduction

4.1 In 2011 three options were considered and consulted on for the Sefton Local Plan [then known as the Core Strategy], based upon the level of development [housing and employment] proposed. Since then further work has been undertaken by consultants NLP to look at the housing requirement for Sefton. The three options that have been considered are as follows:

- **Option One – Urban Containment.** A minimum of 270 new homes per year all provided on sites in the urban area. Employment growth would be limited to existing employment sites in the urban area.
- **Option Two – Meeting Needs.** A minimum of 510 new homes per year based on the identified needs of Sefton’s residents and new employment sites in north and south of the Borough. This would require land from the Green Belt to be released for new homes and employment.
- **Option Three – Optimistic Growth.** A minimum of 700 new homes per year to meet the needs of Sefton’s residents and additional to provide more growth and new employment land in the north and south of the Borough. This would require land from the Green Belt [more than option two] to be released for new homes and employment.

4.2 This section looks at these three options and tests them against the sustainability objectives set out in section two.

4.3 For this stage the following scoring system has been used

++	The Option is likely to have significant positive effects on the SA Objective
+	The Option is likely to have some positive effects on the SA Objective
o	The Option is likely to have a neutral or no effect on the SA Objective
-	The Option is likely to have some negative effects on the SA Objective
--	The Option is likely to have significant negative effects on the SA Objective

Sustainability Objective	Comment		
1. Encourage Economic Growth and Investment	<p>A higher level of household growth, and therefore a move towards population retention and growth, would help to support existing centres (see also objective 4) and help to retain the local labour supply. This would occur under Options Two and Three.</p> <p>Development at the edge of the urban area (as would be required under Option Two and Three) would possibly require new local shops and services and may provide some investment opportunities, although this should be carefully considered so that custom is not drawn away from existing businesses.</p> <p>A higher level of new homes (Options Two and Three) would boost the perception of Sefton as a growth area and could attract investment. Option One would have adverse effects on this objective.</p>		
Option One	Option Two	Option Three	
-	++	++	
2. Reduce unemployment and improve skills	<p>The construction industry and ancillary businesses would benefit from a higher level of household growth. This increased activity could provide opportunities for training and apprenticeships particularly if a local labour policy is implemented. This would favour Option Three the most, followed by Option Two with Option One likely to provide the least benefits under this objective.</p> <p>The provision of more homes would help retain many of Sefton's residents who otherwise may decide to relocate elsewhere. This would be the case under Options Two and Three under which the population will increase. Residents who are able to relocate are usually those with easy to transfer skills and are economically active. Losing population would reduce the overall skill base of an area. This is would be the most likely scenario under Option One. An important proviso here for any option would be the need to provide a good mix of houses to attract and retain a range of social groups (see objective 8) and to ensure any new housing provides good access to employment areas for residents (see</p>		

Sustainability Objective	Comment		
	objective 9).		
Option One	Option Two	Option Three	
-	+	+	
3. Support the Rural Economy	<p>Option One will only provide land in the urban area for new development. There will be no loss of any agricultural land under this option. Both Options Two and Three will require the loss of some best and most versatile agricultural land. However, in total the maximum amount of Green Belt land developed would be <3-4% of Sefton Green Belt land. The agricultural economy in Sefton [<0.3% of Sefton's GVA] is very small and the impact can be considered limited.</p>		
Option One	Option Two	Option Three	
0	-	-	
4. Maintain vibrant town, local and village centres	<p>Higher household growth figures would be more likely to support a wider range of services and facilities within Sefton's centres, but this would be dependent on where household growth would be. Each option would include sites in the existing built up area and these are more likely to be close to Sefton's network of town, local and village centres. The impact of Options Two and Three would depend on the locations that are chosen for new homes required outside the existing urban area. If sites are chosen on the edge of existing settlements with good links to centres then this could help support them. However, if the sites that are chosen are remote from existing town or local centres then it is more likely residents will use facilities elsewhere. Residents will more likely drive to shops and services in more easily accessible locations (e.g. out of centre locations).</p>		
Option One	Option Two	Option Three	

Sustainability Objective	Comment		
o	Possible +		Possible +
5. Provide the required infrastructure to support growth	<p>Option One would only consider sites in the urban areas for future development. Many of these sites are small and have a number of constraints [e.g. demolition and remediation costs, poor housing markets etc]. As such the ability to require developers to contribute to improved infrastructure will be greatly restricted.</p> <p>Options Two and Options Three will both require green field sites outside the urban area and, whilst these sites will require new infrastructure, improvements are likely to benefit the wider area.</p>		
Option One	Option Two	Option Three	
o	+	+	
6. Reduce inequalities and social deprivation	<p>One important factor of deprivation is the standard of living accommodation and whether this is affordable. Option Two, and to a greater extent Option Three, would result in more affordable homes being built. This is because the provision of affordable housing is linked to the building of market homes and how viable these developments are.</p> <p>As mentioned under objectives one and two, Options Two and Three could provide a greater basis for economic growth. Greater economic prosperity helps lift people out of deprivation.</p> <p>Other issues related to deprivation, such as health, crime etc, could be tackled through specific policies in the Local Plan regardless of the option.</p>		
Option One	Option Two	Option Three	
o	+	+	
7. Reduce crime and improve safety	<p>No explicit link between the level of household growth and levels of crime and safety. However if an increased population loss leads to a polarisation of income levels and deprivation (as suggested under objectives one, two and six) then this likely result in higher crime levels, particular in the areas that experience the most population loss. However it is difficult to assess this objective at</p>		

Sustainability Objective	Comment		
	this stage.		
Option One	Option Two	Option Three	
o	o	o	
8. Meet Sefton's diverse housing needs	<p>Option Two is specifically defined to meeting the identified housing and employment land needs for Sefton during the plan period. Option Three would provide housing in addition to this identified need and would seek to maximise growth. Option One would fail to meet Sefton's identified housing and future employment land requirements.</p> <p>As mentioned under objective six, Options Two and Three would present the best chance to meet some of Sefton's affordable housing need. It would be difficult to provide many affordable homes under Option One, due to the low levels of homes planned and nature of sites in the urban area that will compose the supply for this option (i.e. small with a number of constraints).</p>		
Option One	Option Two	Option Three	
--	++	++	
9. Provide better access to services and facilities, particularly by cycling and public transport	<p>Options Two and Three could provide more services and facilities linked to new development. However, the type and scale of these would be dependent on what facilities and services are needed locally and the economic viability of development in an area. Improving access to existing services and facilities would be an objective of all options. Although Options Two and Three could present more opportunity to make substantial improvements to access, many of the sites will be on the edge of urban areas and therefore may be less accessible. As all the new development under Option One would be provided within the existing urban area this is more likely to be close to existing public transport and other links</p>		

Sustainability Objective	Comment		
Option One	Option Two	Option Three	
+	Possible +	Possible +	
<p>10. Provide environments that improve health and social care</p>	<p>Construction activities and associated HGV movements will have an adverse effect on residents living in close proximity to a development site due to associated noise, dust and emissions to air. However, it is assumed that adverse effects will be temporary and be in part mitigated through the adoption of a construction environment management plan. Once the site is occupied, development is likely to result in increased traffic. Associated noise and emissions due to traffic could have an adverse effect on residents. Options Two and Three score poorly under this objective</p> <p>Options Two and Three would require land in the Green Belt for future development. For those who live at the urban edge this may have a negative effect on their health if they currently use this for informal exercise. Another point of view is that the development of more homes and more development sites presents the opportunity to create more parks and other recreational facilities that help improve health.</p>		
Option One	Option Two	Option Three	
o	-	-	
<p>11. Strengthen communities and help people be involved in local decisions</p>	<p>Option One would result in a continued decrease in population and some communities would be weakened by the loss of residents. During the 2011 options consultation a large number of residents objected to the release of any Green Belt land and many would view progressing with Option Two or Three as going against their wishes.</p>		
Option One	Option Two	Option Three	
-	-	-	
<p>12. Adapt and mitigate</p>	<p>Options Two and Three would require land in the Green Belt to be</p>		

Sustainability Objective	Comment		
to climate change	<p>released (Option Three more). In simple terms this could contribute to climate change as there would be less 'green land' (see objective 14 also) to absorb carbon. However as mentioned above the amount of Green Belt land release under either option would be a very small amount of Sefton's total Green Belt.</p> <p>The adoption of sustainable construction techniques and design including the incorporation of renewable energy provision may generate positive effects in relation to energy efficiency and renewable energy use although this is dependent on plan policies and detailed design proposals and is therefore currently uncertain</p>		
Option One	Option Two	Option Three	
o	o	o	
13. Reduce the risk from flooding	<p>Option Three, and to a lesser degree Option Two, will require more undeveloped (i.e. Green Belt) land for development purposes and this may increase the amount of homes at risk of localised flooding due to less permeable surfaces and increased pressure on the existing drainage system. Option Three would require a significant amount of Green Belt land and some land in flood zone 2 may have to be considered. Under any option measures can be implemented to reduce the risk of flooding, such as Sustainable Drainage Systems, and therefore the impact at is difficult to determine at this stage.</p>		
Option One	Option Two	Option Three	
o	o	o	
14. Reduce pollution	<p>The change in pollution levels would be negligible for the differences in household growth that are proposed between the three different options. The only difference would be Options Two and Three would most likely see a small increase in car use as a small part of the population will be dispersed slightly to the edge of the urban area. However, measures could be implemented, such as improved access to public transport, to help offset this.</p> <p>The economic growth secured under Options Two and Three</p>		

Sustainability Objective	Comment		
	would help bring back into use contaminated land.		
Option One	Option Two	Option Three	
o	o	o	
15. Reduce waste and use of natural resources	<p>Option Three, and to a lesser extent Option Two, will inevitably use more natural resources both in the construction phase of homes and once they are occupied. Modern building techniques and resource efficiency measures should ensure that use of natural resources is kept to a minimum.</p>		
Option One	Option Two	Option Three	
o	-	-	
16. Protect Sefton's valued landscape, coast and countryside	<p>It is unlikely that any option would have any significant impacts on Sefton's coast. Options Two and Three would require land in the Green Belt to be released, however the coastal areas of Sefton have clearly defined protection and would not under any circumstances be considered for development.</p> <p>Option Two, and more significantly Option Three, will require land for development purposes from Sefton's Green Belt. Although measures will be put in place to protect the most valued landscapes, parts of the Green Belt, including agricultural land, will be lost to development. Option One would not propose any land outside the urban area for future development.</p>		
Option One	Option Two	Option Three	
++	--	--	
17. Bring back into use derelict and underused land and buildings	Regardless of the option the Local Plan a number of sites in the urban area will be included in the housing requirement.		
Option One	Option Two	Option Three	

Sustainability Objective	Comment		
+	+	+	
18. Protect and enhance biodiversity	Similar to the objective on protecting the coast (see objective 16) measures will be implemented that would seek to protect the land most valued for their biodiversity value. Nevertheless, Options Two and Three would both require land of biodiversity value with less protection for development. Whilst this will often have to be compensated for the impact will still be considered negative.		
Option One	Option Two	Option Three	
o	-	-	
19. Protect and enhance Sefton's culture and heritage	Many of Sefton's heritage assets are outside the urban area and a rural setting is intrinsic to their value. Options Two and Three may put some of these assets at risk due to development pressure [particularly unknown assets]. However, the impact can often be negated through careful and sensitive design and the impact on this objective is unknown at this time.		
Option One	Option Two	Option Three	
o	o	o	
20. Provide a quality living environment	This objective will be influenced more so by detailed policies regardless of which of the option is progressed.		
Option One	Option Two	Option Three	
o	o	o	

4.4 In addition to the level of growth in Sefton options for the distribution of growth were considered. In generating options for the distribution of growth of Sefton there are a number of key considerations that are important:

- There is a continued need to promote regeneration in Sefton. Each of the Local Plan options will include the promotion of a significant number of urban sites for future

development. No options therefore are considered reasonable if they did not include these.

- Option One would not require any land in the Green Belt and therefore the distribution of sites will be determined by site availability.
- The SEA Directive[section 14] is clear that options should be ‘reasonable’ and take ‘into account the objectives and the geographical scope of the plan or programme’
- The geography of Sefton, including the number of environmental constraints and designations, make it unreasonable for the consideration of a new stand-alone settlement in Sefton [i.e. in the Green Belt].
- A Green Belt Study was published in May 2011. This assessed the whole of Sefton’s Green Belt against the five purposes of Green Belt [as set out in the NPPF] and a number of critical environmental constraints [such as flood zone 3 and important nature sites]. The consideration of options did not negate this study but used the results to inform them.

4.5 Therefore, taking these factors into account, we have determined that the only reasonable option for distributing growth in Sefton [for Options 2 and 3 only] is to provide a number of extensions to Sefton’s towns and largest villages.

Consequences Study

4.6 To help inform the choice of the Preferred Option for Sefton a study was commissioned to evaluate the economic, social and environmental consequences of each the options above. This study, known as a ‘Consequences Study’, therefore overlapped on the remit of the Sustainability Appraisal. The Consequences Study is available to view at www.sefton.gov.uk/localplan. The key conclusions of Consequences Study for each of the options are provided below.

Option 1 (Urban Containment), can be achieved in all parts of the Borough without too many significant adverse impacts. However, development may impact on sites of international and national environmental importance in many parts of Southport in addition to areas in Formby and Crosby. In addition, there are clear opportunity costs resulting from the missed fiscal, economic and social benefits that additional housing would bring to Sefton. Due to the relatively low level of housing proposed by this Option, it would fail to meet identified social housing needs in all areas except Bootle, where there is currently an over-provision of affordable homes.

Option 2 (Meeting Identified Need), could result in all the ‘best’, or most sustainable, Green Belt sites coming forward for development and would almost double the overall level of provision. The release of a number of greenfield sites would result in the loss of some Grade 1 – 3a agricultural land in parts of Southport, Crosby and Maghull/Lydiat and Aintree. This option could also require investment in social infrastructure, in particular: additional school places; more capacity at GP surgeries; retail services and green infrastructure. However, this option would also provide an additional 46.5 – 49 ha of employment development in Southport, Formby and Maghull with the potential to support the creation of almost 4,000 new jobs. It could also inject a significant economic boost to the Borough, in addition to generating a large number of direct construction jobs and indirect employment.

Option 3 (Optimistic Household Growth), would rely on a number of large Green Belt 'reserve' sites coming forward for residential development. These additional sites could deliver approximately 1,483 additional dwellings than Option 2 but would be unevenly distributed across the Borough, located predominantly in Formby and Lydiate. In addition to the impacts identified under Option 2 above, this Option could place substantial strain upon key social infrastructure provision in Formby and add significant congestion to the existing transport network in the Maghull/Lydiate and Aintree area. Even allowing for the increase, Furthermore, the economic benefits of this option are not substantially greater than those associated with Option 2.

Preferred Option

The Council's Preferred Option for its Local Plan is **Option 2 – Meeting Needs**. The Local Plan will include policies that will plan for 510 homes per year and for three new employment areas. This will require land in the Green Belt for development during the plan period [i.e. up to 2030].

The issues that have been identified within the sustainability appraisal process that have helped to inform the decision include:

- Option Two would meet Sefton's housing needs. This will include both market and affordable homes and be located, as far as possible, in the locations in which that need has been identified.
- Option Two would provide new locations for businesses to locate providing a stimulus to economic growth in Sefton helping to diversify the local economy. Improvements to public transport to new employment areas would help reduce unemployment in Sefton, particularly those areas that have current rates much higher than the national average.
- Option Two will help prevent the continued decline in Sefton's population. This will help support our local services and facilities, such as shops, schools, health centres, public transport etc
- The level of new development will bring about improvements to infrastructure through developer contributions. New development may also secure investment to assist with regeneration programmes.
- Whilst Option Two would require land in the Green Belt, this will be less than is required than under Option Three. The impact on the loss of agricultural land, landscape and areas valued for ecology will be limited.
- The amount of development proposed under Option Two will allow areas at highest risk of flooding to be avoided.

It should also be remembered that the Sustainability Appraisal is not the decision-making process. It helps inform decision makers on their decisions. Other factors will also inform their decision, such as wider Council priorities and aspirations, results of working with our

neighbouring local authorities, the need to adhere to National planning requirements, other evidence [such as the Consequences Study] and public opinion.

The choice to proceed with Option Two is not without risks and potential adverse effects. The Sustainability Appraisal process has identified a number of mitigation measures that should be implemented to help reduce these impacts. A result of the Sustainability Appraisal process the Local Plan should:

- Try to secure businesses that require large number of employees. Seek ways to improve access to new employment areas, particularly from deprived areas.
- Seek to maximise the number of affordable homes that are provided.
- Allocate land for new homes in areas that are most accessible, or are capable of being made accessible, by public transport, walking and cycling.
- Set out the infrastructure improvements that are required and be clear how these will be provided and when.
- Seek to encourage greater use of public transport to reduce the reliance on the car to offset any congestion, pollution etc.
- Provide clear and strong design policies for all developments, with particular care to respect the character of existing local neighbourhoods, both in terms of the buildings and landscape.
- Avoid areas with the greatest risk from flooding. Areas that have severe problems with surface water flooding should be avoided and uses as areas of open spaces as part of larger developments if suitable. Sustainable drainage systems should be used on site and any development should not increase the surface water run-off.
- Maximise sites in the urban areas so as to reduce the need to release land in the Green Belt

Section Five

Assessment of Green Belt Sites

5.1 This section provides a summary of the results of the sustainability appraisal of sites considered for development in the Green Belt. Option Two, the preferred option, requires land in the Green Belt to accommodate approximately 5000 homes, and land for 3 new employment areas. The option will also include between 5000-5700 homes in the urban area.

5.2 In May 2011 a draft Green Belt Study was published. The Green Belt Study considered the whole of the Green Belt in Sefton for future development as a starting point but identified significant areas that should remain within the Green Belt for a number of key reasons, namely:

- How important the site was in meeting the five purposes of the Green Belt, as set out in the National Planning Policy Framework.
- Whether the site contained any critical environmental constraint, such as land with a high risk of flooding (e.g. Flood Zone 3) or important nature sites.

5.3 The Green Belt Study identified a number of Green Belt sites across Sefton that were considered to have some potential for future development. A borough-wide map showing the distribution of these locations is provided in below. These were consulted on during May to August 2011. The draft Green Belt Study can be viewed at www.sefton.gov.uk/greenbeltstudy. This Sustainability Appraisal has only considered the sites that the Green Belt Study identified as potential suitable for development.

5.4 The assessments of the Green Belt Sites [as set out in Appendices E] use the following scoring system. It should be noted that if a double positive score is achieved for any objective this does not mean the site is necessarily preferred for development. Conversely if a site scores a double negative it does not mean the site cannot be promoted for development. The scores are intended to identify negative issues that may need addressing or positives that can be maximised. In addition to the appraisal of the Green Belt sites a separate 'Assessment of Green Belt Sites for Inclusion in the Local Plan's Preferred Option'. This is available at www.sefton.gov.uk/localplan

++	Development of site could bring significant positive effects to the local area and/or Sefton as a whole.
+	Development of site likely to have some beneficial effects
o	Neutral or no effects
-	Development of the site is likely to have some adverse effects
--	Development of the site is likely to result in significant adverse effects to the local area and/or Sefton as a whole.

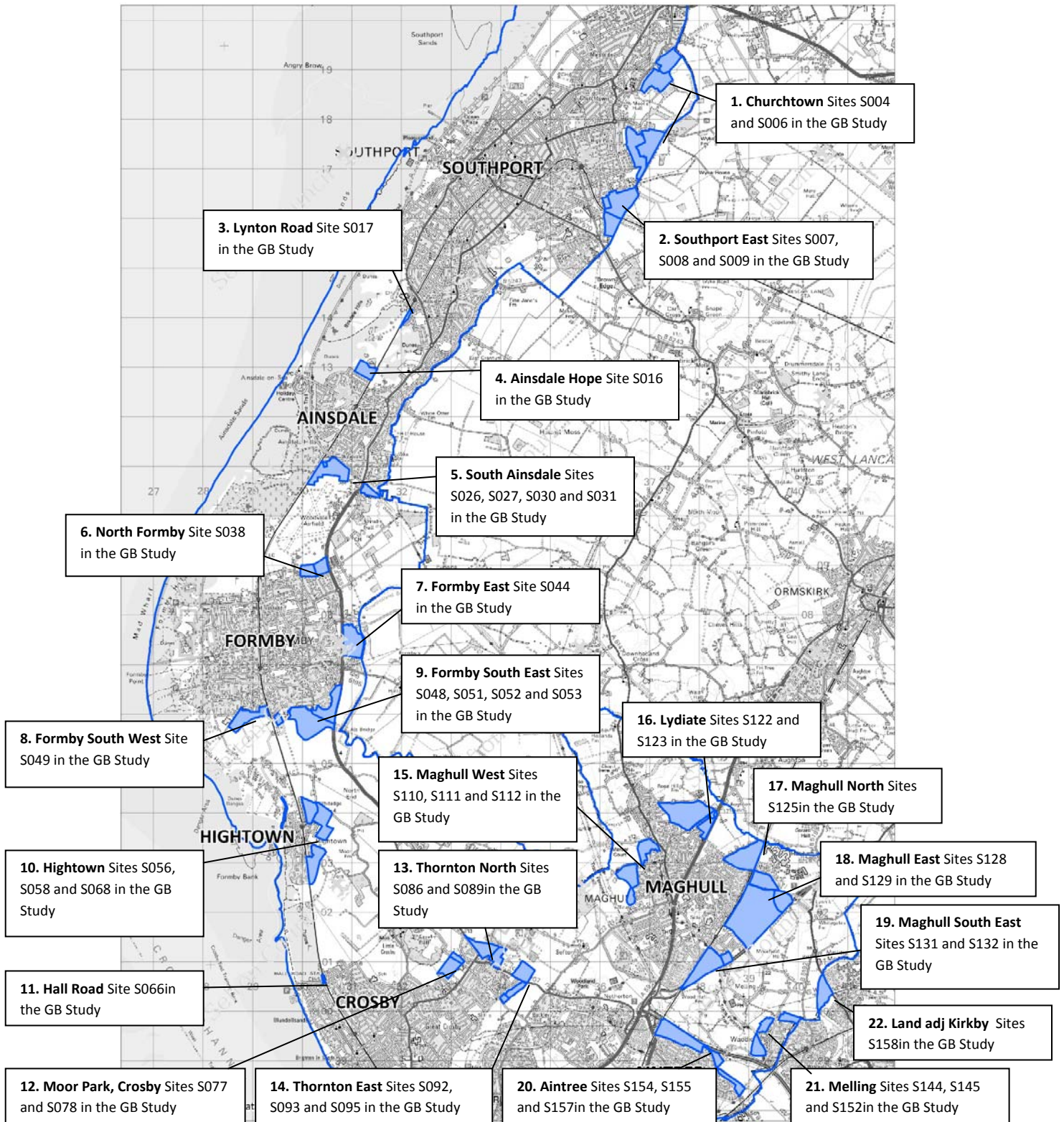


Figure 5.1 Sites in the Green belt considered suitable for development in the Green Belt Study

5.5 A summary of the Sustainability Appraisal scores for each of the locations considered is presented in figure 5.2 below. The full sustainability appraisal assessments are available in Appendix E.

Figure 5.2																				
Site	1. Encourage economic growth and investment	2. Reduce unemployment and improve skills	3. Support the rural economy	4. Maintain vibrant town, local and village centres	5. Provide the required infrastructure to support	6. Reduce inequalities and social deprivation	7. Reduce crime and improve safety	8. Meet Sefton's diverse housing needs	9. Provide better access to services and facilities,	10. Provide environments that improve health and	11. Strengthen communities and help people to be	12. Adapt and mitigate to climate change	13. Reduce the risk from flooding	14. Reduce pollution	15. Reduce waste and the use of natural resources	16. Protect Sefton's valued landscape, coast and	17. Bring back into use derelict and underused land	18. Protect and enhance biodiversity	19. Protect and enhance Sefton's culture and heritage	20. Provide a quality living environment
1. Churchtown	o	+	-	+	-	+	o	++	+	-	:	o	o	-	-	-	o	:	-	+
2. East of Southport	++	+	-	+	o	+	o	++	-	-	o	o	o	-	-	-	o	-	o	+
3. Lynton Road, Birkdale	o	+	o	+	o	+	o	+	+	o	-	o	o	-	-	o	o	:	o	+
4. Ainsdale High	o	+	o	++	o	+	o	++	++	-	-	o	o	-	-	-	+	+	o	+
5. South Ainsdale	o	+	-	+	o	+	o	++	-	-	-	o	o	-	-	:	o	-	-	+
6. North of Formby	o	+	-	+	o	+	o	++	-	-	:	o	-	-	-	:	o	:	o	+
7. East of Formby	++	+	-	o	o	+	o	o	o	-	o	o	o	-	-	-	o	:	-	o
8. South West of Formby	o	+	-	+	o	+	o	++	-	-	:	o	o	-	-	:	o	-	-	+
9. South East of Formby	o	+	-	+	o	+	o	++	o	-	:	o	o	-	-	:	o	-	-	+
10. Hightown	o	+	-	+	-	+	o	+	-	-	:	o	o	-	-	:	o	-	-	+
11. Hall Road, Crosby	o	+	o	o	o	+	o	+	-	-	o	o	o	-	-	o	++	-	o	+
12. Moor Park, Crosby	o	+	-	+	:	+	o	++	+	-	:	o	o	-	-	:	o	-	:	+
13. North of Thornton	o	+	-	+	o	+	o	++	+	-	:	o	o	-	-	:	o	-	-	+
14. East of Thornton	o	+	-	+	o	+	o	++	-	-	-	o	o	-	-	-	o	-	-	+
15. West of Maghull	o	+	-	+	-	+	o	++	+	-	:	o	o	-	-	:	o	-	-	+
16. Lydiate	o	+	-	+	o	+	o	++	+	-	:	o	o	-	-	:	o	-	-	+
17. North of Maghull	o	+	:	+	o	+	o	++	-	-	-	o	o	-	-	:	o	-	-	+
18. East of Maghull	++	++	-	+	+	+	o	++	-	-	-	o	o	-	-	-	+	-	-	+
19. South East of Maghull	o	+	-	+	:	+	o	++	:	-	-	o	o	-	-	-	o	-	o	+
20. Aintree	o	+	o	+	-	+	o	++	+	-	:	o	o	-	-	-	o	-	-	+
21. Melling	o	+	-	+	o	+	o	++	-	-	:	o	o	-	-	:	o	-	-	+
22. Land adj to Kirkby	o	+	-	o	o	+	o	+	:	-	-	o	o	-	-	:	o	-	-	+

Summary of Green Belt Sites Assessments

5.6 Many of the sites that have been considered suitable for development have a number of constraints and issues. The identification of these help inform the decision whether to promote a site for development and, if so, what mitigation methods should be used to reduce any negative impacts and how positive impacts can be maximised.

5.7 In the Southport area, including Ainsdale, many of the sites have landscape value. It is inevitable that to meet Sefton's housing and employment needs there will have to be some loss of this land. This is the same for the loss of agricultural land. Southport is Sefton's largest town, has the largest housing need and is very constrained [by the sea and West Lancashire]. Therefore, to attempt to meet as many local needs as close as possible where they arise some difficult decisions have to be made. Nevertheless a couple of sites have been removed from further consideration primarily due to the nature value onsite, such as at near Churchtown [part of S004 north and S004 central], Lynton Road [S017] and Southport Golf Course [S006]. Limited development only is proposed on the north part of S006 [adjacent to the existing urban area] to limit any impact on the landscape. S008 and S009 have not been identified for development as they are committed for other uses. S007 is considered suitable for a mixed use development.

5.8 In the Formby area sites have been proposed for development at different locations around the town. The potential to significantly impact on listed buildings at the southern end of the town and the significant encroachment into the countryside/landscape has led to the conclusion that some of these sites [primarily parts of S049 and S053] are less sustainable than other sites in this area. The eastern section of S038 in the north of Formby is considered less sustainable due to the risk from flooding and ecological issues. Site S044 is considered suitable for employment use only, due to its location next to the bypass. However, this will result in a loss of a local nature site and compensatory provision will have to be provided.

5.9 The sites around Hightown are largely free from significant constraints, although the impact on the countryside/landscape would be significant if all the sites were proposed for development. A large number of new homes in the village would be difficult to support given the limited number of services and facilities in the village and the current road network issues. However, a limited number of homes could be provided next to village without significant adverse affects.

5.10 There was a limited choice of sites around Crosby and Thornton for development. Hall Road [S066] is a previously developed site and is proposed for development. The sites around Thornton [S086, S089, S092, S093 and S095] are largely free from constraints and for the most part, are proposed for housing development. The sites close to Virgins Lane, Crosby [S077 and S078] are not considered suitable for development due to the impact they would have on the heritage assets in the area, such as Little Crosby Village, and the fact the local road network is already past capacity.

5.11 Maghull and Lydiate had the most sites identified as being potentially suitable for development in the Green Belt Study. As such there is more scope to make informed

choices on which sites would be proposed for Green belt release and new development. The site that the process has identified as the most sustainable is the large site east of the town [S128 and S129]. The reasons for this are that it is well contained and therefore its impact on the countryside/landscape is less than other sites around Maghull/Lydiat. There is also more scope to have major improvements and sustainable travel through a new rail station and improved access to/from the motorway. The development of this site could also provide additional employment land in area that could be made accessible to much of south Sefton. Whilst the appraisal has not concluded that other sites are unsuitable, given that one of the key objectives of the Local Plan is to meet needs where they arise, it would be not be appropriate to allocate all housing sites around one settlement.

5.12 The key significant effect of the sites around Aintree is likely to be access and congestion. A significant number of new developments would exacerbate this. Only limited housing is proposed in the Aintree area. Melling is similar in that it would be unsuitable for a very large number of homes. Only two of the sites [S144 and S145] are proposed for development as it is considered that these better relate to the existing village, and therefore impact less on the countryside, than the third site S152. The site adjacent to Kirkby [S158] is not proposed for development primarily as it is not considered that homes would meet Sefton's needs or support Sefton's services.

5.13 The Green Belt sites proposed for development for the Local Plan preferred option are identified in figure 5.3

Impact the appraisal process has had

5.14 The Sustainability Appraisal of the Green Belt sites has helped to summarise many of the issues on the sites. This has helped inform the decision on which sites have been proposed for development as part of the Local Plan. However, it should be noted that other influences have also influenced this choice, notably other studies [Primarily the 'Assessment of Green Belt Sites for Inclusion in the Local Plans Preferred Option' – see www.sefton.gov.uk/localplan], landowner intentions [i.e. if a landowner doesn't want a site developed it was not included] and the Local Plan objectives.

5.15 The key outcome of the Sustainability Appraisal process is that potential mitigation measures have been identified if sites are developed. Some of the key mitigation measures that should be included in any development proposals or any master planning of sites include:

- Areas at risk of surface water flooding over a certain depth should be avoided and designed within the open space area of a site proposal
- To reduce the impact on the wider landscape, the design of the urban edge should take account of the characteristics of the landscape type
- Ways should be sought that help pedestrians and others access services, facilities and open spaces

- Developer contributions should be sought to provide for new or improved infrastructure and services so that the situation is no worse than before the development and preferably improved
- In areas that will result in a loss of land that has ecological value, compensatory habitat should be provided in suitable locations
- Detailed master planning of sites and planning applications should be developed in partnership with local residents and groups
- Developing close to heritage assets, such as listed buildings and conservation areas, should only be done where the setting will not be compromised

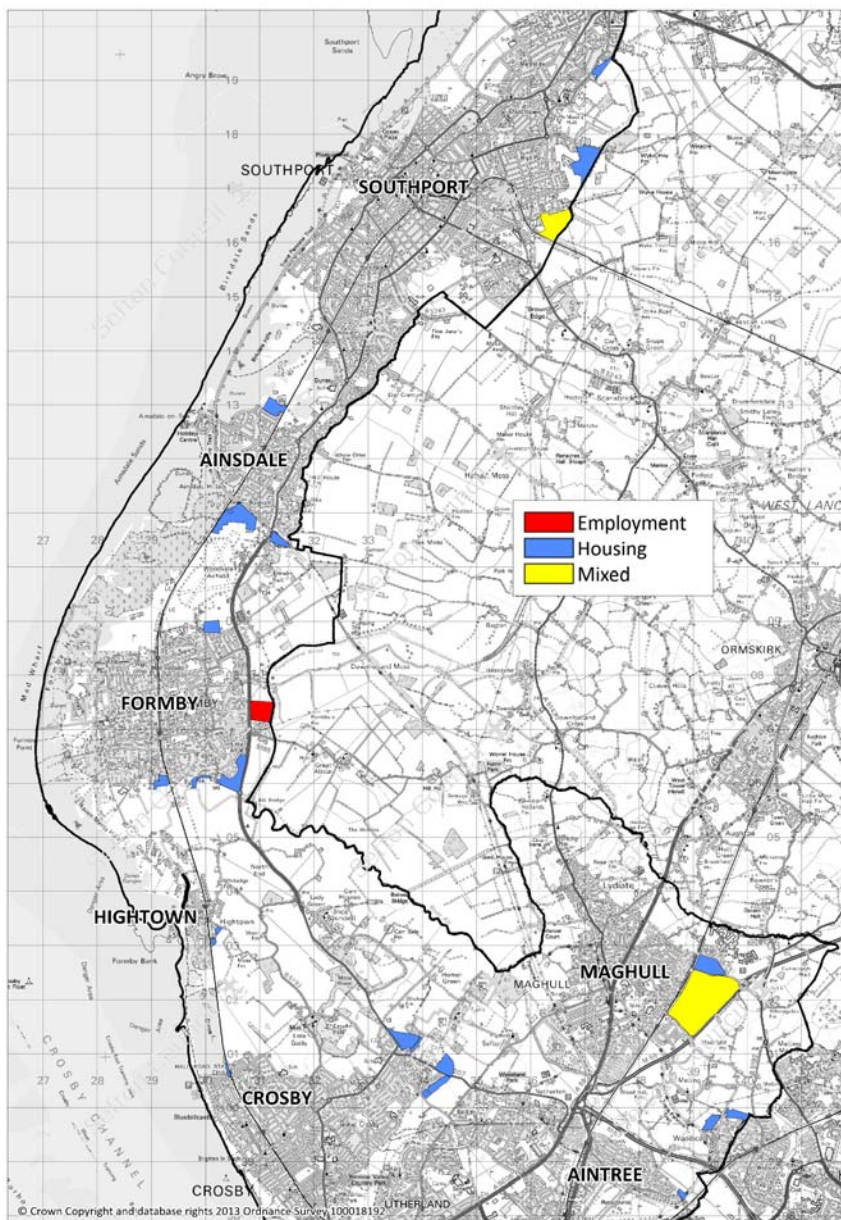


Figure 5.3 Proposed Locations for Development in the Green Belt in Sefton's Local Plan Preferred Option

Section 6

Sustainability of the Preferred Option

6.1 The Local Plan is made up of a Vision and Strategic Objectives [these are assessed in section three]; Site Allocations and Policies.

6.2 The key points from the Local Plan are:

- The Spatial Strategy [table below] sets out overarching approach of Sefton's Local Plan
- The plan will provide for an annual housing requirement of 510 homes per year, plus a further 1500 homes to account for a backlog and buffer [i.e. about 10,700 in total]. Approximately 5000 homes will be provided in what is currently Green Belt [these are considered in section 5]
- The plan identifies five Strategic Employment Locations. Three of these will be provided in what is currently Green Belt [these are considered in section 5].
- The Local Plan contains a whole range of policies that cover issues and sites

6.3 The Local Plan Preferred Options Consultation Document can be viewed at www.sefton.gov.uk/localplan.

6.4 The Spatial Strategy for the Local Plan Preferred Options, which sets out how growth in Sefton to 2030 will be met.

Spatial Strategy for Sefton

1. Development in Sefton should be consistent with the following principles:
 - Development should meet needs in the areas where they arise as far as possible;
 - Proposals should make the best use of Sefton's assets and resources, in particular brownfield land;
 - Development should be located on sites with the fewest environmental constraints;
 - Development should be in accessible locations.

This means that development in Sefton during the plan period [2015-2030] will be concentrated in and adjacent to the key towns of Southport, Formby, Crosby, Maghull and Bootle / Netherton.

A limited amount of development will be permitted adjacent to Hightown, Aintree and Melling/Waddicar. Only limited infill will be permitted in the smaller villages where this does not harm the character of the village or conflict with other policies in the Local Plan.

With the exception of the sites listed below and shown on the Proposals Map, the extent of the Green Belt will be maintained so that it continues to perform the five purposes of the Green Belt set out in the National Planning Policy Framework.

2. Land in the Green Belt will be released to meet the following needs [see map below for sites]:
 - A. New employment sites to meet the needs in the north and south of the borough; and
 - B. New housing to meet identified needs which cannot be met in the urban areas in the

following areas:

- To the east of Southport and adjacent to Ainsdale;
- To the north and south of Formby;
- To the southeast of Hightown;
- To the north of Crosby and east of Thornton;
- To the east of Maghull, including the 'prison' site;
- To the east of Aintree; and
- To the north of Melling.

6.6 This section assesses the Sefton Preferred Option Local Plan as a whole. It therefore assesses the 'cumulative' impact of the plan as a whole, including sites proposed for development. Commentary is provided for each of the twenty SA Objectives. The full SA assessment tables for the Local Plan Preferred Options are provided at Appendix F. Individual SA assessment tables for each of the individual Local Plan policies are provided at Appendix G.

Encourage economic growth and investment [SA Objective 1]

6.7 The Local Plan seeks to significantly improve economic growth in Sefton. Primarily it allocates three additional sites for economic growth [adjacent to Maghull, Formby and Southport] in addition to promoting the existing strategic employment location at Southport Business Park and the Dunningbridge corridor. Sefton currently has the least amount of employment of all the local authorities in Merseyside and there is a high reliance on public sector employment [over 40%]. Providing land for new employment opportunities and investment will help make Sefton a more attractive location for new businesses to locate or start-up.

6.8 The Local Plan also promotes the growth of the Port of Liverpool, large parts of which are within Sefton. The Port of Liverpool is seeking to expand during the Local Plan period and this is likely to not only result in the expansion of port related business, but also ancillary businesses too. The allocation of employment land will help Sefton to be best placed to take advantage of this growth.

6.9 The level of housing growth promoted in the Local Plan is also likely to result in huge investment in Sefton. The construction and associated infrastructure costs of delivering 10,000 new homes and new businesses could come to over £1.4 billion. Local businesses would also be expected to benefit from temporary increases in expenditure linked to direct and indirect effects of the construction phase. The population growth that the level of new homes is likely to support would bring in increased expenditure and help support local centres and businesses.

Reduce unemployment and improve skills [SA Objective 2]

6.10 Linked to the above objective, the allocation and promotion of land for business growth in Sefton will significantly increase the longer term employment opportunities in Sefton. As mentioned above there is reliance on public sector jobs in Sefton and these have been particularly badly hit by the recent spending review. The growth of the Port and availability of land for other businesses should help to diversify employment in Sefton. The Employment Requirement and Strategic Employment Locations policy specifies that development should deliver 'high job outputs', i.e. should not be high land, low job businesses such as warehouses.

6.11 Whilst some of the new employment areas are at the edge of the existing areas, policies in the Local Plan seek to have transport improvements to increase accessibility. In particular the land East of Maghull should be supported by a new rail station and motorway link. This will make the employment area more accessible, particularly to the area of Sefton [i.e. Bootle] that has highest unemployment.

6.12 The level of homes proposed in Sefton during the plan period would make a significant contribution towards reducing recent job losses in the construction sector. It is estimated that some 1300 full time equivalent jobs could be created in the short and medium term in the construction industry as well as a further 2000 indirect jobs. The delivery of the three employment sites is expected to deliver a number of economic benefits, including approximately 4,000 new jobs.

Support the rural economy [SA Objective 3]

6.13 Whilst the plan doesn't directly seek to promote economic growth in the rural areas, the provision on employment land in Sefton [see above] will also help residents in rural areas to access new employment and investment opportunities. This will more likely to happen if improvements for public transport are provided.

6.14 The loss of some agricultural land for housing and employment growth may make some farms, smallholdings and other businesses in the rural areas less viable. However, this is likely to be minimal given the small proportion of Green Belt land that is promoted for development and the limited proportion of Sefton's GVA the rural economy contributes.

6.15 The Development in the Green Belt policy does allow for certain types of new development, or redevelopment, of sites and buildings in the Green Belt, and this may help new and existing rural businesses.

Maintain vibrant town, local and village centres [SA Objective 4]

6.16 The key policy that will guide development in Sefton's centres is the Development in Centres and Local Shopping Parades. This sets out the hierarchy of centres in Sefton and the type and scale of development that would be permitted in each. Whilst this policy will

help support Sefton centres there is an acknowledgement that the Local Plan can only go so far is promoting/protecting centres. In recent years centres have suffered badly due to the poor economy and the impact of out-of-centre and online retailers. Centres are likely to have to diversify to survive and, whilst the plan allows this, the impact of the Local Plan will only be one part of this.

6.17 The promotion of economic growth and new homes in Sefton will help to support the centres in Sefton, due to more people and greater expenditure, however this cannot be said to be significant as many new homes will be at the edge of existing urban areas and also it cannot be guaranteed that expenditure will automatically be directed to centres.

Provide the required infrastructure to support growth [SA Objective 5]

6.18 The level of new development proposed in the Local Plan will bring about investment in new infrastructure. This will be secured through a number of means but primarily through developer contributions. New infrastructure that would be expected to be provided, and what is promoted through a number of Local Plan policies, include new and improved roads, public transport improvements, increased capacity in schools, new and improved open spaces, utilities and communication infrastructure. The intention is that Sefton will have a draft Community Infrastructure Levy charging schedule next year and this will support the Local Plan Publication. A proportion of this will go directly to neighbourhoods who can use this money to invest in their own priorities for infrastructure improvements.

Reduce inequalities and eliminate social deprivation [SA Objective 6]

6.19 The benefits brought about by economic growth and new jobs will result in many of the issues of inequality being addressed. The recent economic downturn has hit the low skilled more and unemployment in south Sefton is running at much higher than in other parts of Sefton. Diversification of job opportunities, supported by improved access, will help reduce the imbalance in Sefton.

6.20 The number of new homes, many of which will be affordable, and all of which will be resource efficient, will help address many of the problems that come about due to poor living conditions. The investment in local infrastructure, such as public transport, parks, community facilities etc, will also help address many issues that contribute to deprivation.

6.21 In Sefton there is an agreement that funds that are secured through the building of new homes, will be directed towards the completion of regeneration programmes in some of Sefton's most deprived areas [i.e. the Housing market renewal programme]. This has, and continues, to regenerate some areas of Bootle that have experienced housing market failure in the past and have some of the poorest local environmental quality.

Reduce crime and improve safety [SA Objective 7]

6.22 It is difficult to assess the direct impact of the Local Plan on this objective. The determinants of crime are so wide and vast that it is difficult to assess what impact the local environment, availability of jobs, homes etc has. There is plenty of evidence to suggest that these factors do influence wider societal impacts, such as crime, but it is likely that these could only be marginal in a strategic plan such as this. Nevertheless the provision of land for new jobs and investment, new homes, and improvement of new services and facilities is likely to be positive in reducing unemployment, increasing life chances for all and helping to strengthen communities. Design measures can also be used to reduce crime, for example through improving surveillance.

Meet Sefton's diverse housing needs [SA Objective 8]

6.23 One of the key elements of the plan is that it seeks to provide enough homes, including affordable homes, to meet all the needs in Sefton. The Local Plan also provides for an allowance to meet the unmet needs that have not been provided for the past decade. The plan sets out that 30% of all new homes [in schemes of 15 homes or more] should be affordable. As many new homes in Sefton will be provided on green field sites, the likelihood is that these will have more viability and that there is a greater degree of certainty that affordable homes can be provided.

6.24 The Local Plan will also seek to meet the needs of travellers. Whilst it doesn't allocate sites yet [a traveller needs study is currently being undertaken] the draft Local Plan does state that this will be included at the next stage [i.e. publication].

Provide better access to services and facilities, particularly by walking, cycling and public transport [SA Objective 9]

6.25 The Local Plan includes a policy, Access and Facilities, that seeks to improved access to, from and within new developments. The priority for new development will be areas that are, or can be made, accessible to public transport. Approximately 50% of new homes will be provided in the existing urban area during the Local Plan period and generally these sites are close to [and will support]existing services and infrastructure. The remainder will be provided on generally larger urban edge sites which will be supported by new services. It is likely that improvements will take a short while to be implemented and that the impact will be directly related to new developments and any issues with existing homes/jobs may be more difficult to address.

Provide environments that improve health and social care [SA Objective 10]

6.26 The impact on health is one the less direct implications of the Local Plan. However, two of the key determinants on people's health are the provision of homes and jobs. As the plan seeks to meet both of these it can be said that the plan will have a positive impact on health [which includes mental as well as physical health]. Health has many influences and the impact of the Local Plan cannot be said to be significant. Other ways the local plan will

have influence on health will be through the provision of a network of good quality open spaces, which provide places for people to exercise, escape from the urban environment/pollution, access nature and participate in community activities. The Local Plan also seeks to restrict the proliferation of fast food takeaways close to where children spend their time [i.e. school and parks] as a part of a wider Council programme to tackle childhood obesity. The plan also seeks to reduce the risk from a range of pollution types, many of which would directly affect health.

Strengthen communities and help people to be involved in local-decision making [SA Objective 11]

6.27 The Local Plan has, and will continue, to be subject to public consultation and scrutiny. Some of the aims of the plan are to provide homes and jobs for people that will help strengthen communities. However, in the short term the allocation of sites for employment and homes, particularly in the Green Belt, will be unpopular and controversial. It must be conceded that in the short term that if the plan is approved it will be against the wishes of many local residents and groups, many of which will feel like their comments have been ignored.

Adapt and mitigate to climate change [SA Objective 12]

6.28 New development will bring about traffic and energy use, both in construction and following completion. The adoption of sustainable construction techniques and design, including the incorporation of renewable energy provision may generate positive effects in relation to energy efficiency and renewable energy use although how much this will offset negative impacts is unclear at this stage.

6.29 There is a clear link between economic growth and more energy use. As people become more affluent they tend to be prepared to spend more on heating their homes, owning/driving cars and consuming more goods. These all impact on climate change. As the plan seeks to improve local economic growth and wealth it is likely that Sefton's residents will consume more and have a greater impact on climate change.

6.30 A number of policies seek to reduce the impact of climate change and maximise sustainable use of resources, although it is unlikely that these can offset all the impact of any growth.

Reduce the risk from flooding [SA Objective 13]

6.31 In general terms, the areas at the highest risk from fluvial flooding [i.e. from rivers] have been avoided when allocating sites on the edge of urban areas for new development. There are areas that have a risk from surface water flooding, although these areas will be avoided where possible. The Flood Risk and Surface Water Management Policy sets out the development will only be permitted if no other reasonable alternative sites are available.

The policy also sets that surface water is managed sustainably and that any new development does not increase [and decreases where possible] the risk from flooding.

Reduce pollution [SA Objective 14]

6.32 The Local Plan includes a policy, Pollution and Hazards, that seeks reduce pollution. However, it is inevitable that new development will create different types of pollution, both during its construction and afterwards when it's occupied. New development is likely to have a negative effect on environmental quality due to light pollution and noise arising from construction activities and associated HGV movements, particularly given its proximity to residential receptors. However, it is assumed that adverse effects will be in part mitigated through the adoption of a Construction Environment Management Plan [CEMP]. Once the site is occupied, development is likely to result in increased traffic and therefore increased air pollution. Notwithstanding the improvement of facilities at the urban edge, the likelihood is that new residents will prefer to use the car to access shops, schools etc. This is more likely to happen if the economic and employment growth occurs as proposed and residents have greater choice.

Reduce waste and the use of natural resources [SA Objective 15]

6.33 As with any growth, development will result in the use of resources associated with the construction of building and related infrastructure. Whilst adverse effects may in part be mitigated through the adoption of sustainable construction techniques and design (e.g. the use of recycled materials), as promoted through the Local Plan, the development of greenfield sites will restrict opportunities to utilise existing buildings and reuse/recycle on-site demolition waste.

Protect Sefton's valued landscape and green infrastructure (including coast and countryside, urban green space and trees and water areas) [SA Objective 16]

6.34 All of Sefton's countryside area is valued for its landscape [as set out in the Landscape Supplementary Planning Guidance Note]. Allocating parts of this land will therefore have a negative impact on this objective, particularly at a local level. This will be alleviated to a certain degree by ensuring that the sites chosen are adjacent to the urban area and are primarily well contained [i.e. by roads, rail, natural features etc].

6.35 Sefton's [undeveloped] coast is one of its key environmental assets and its protection and enhancement is one of the key components of the Local Plan. Whilst appropriate [restricted] development will be allowed along the undeveloped coast, no significant proposals are promoted near the coast.

6.36 One potential negative consequence of the Local Plan is that if the economic growth, increased population and employment that is proposed comes to fruition, there may be a greater number of visitors to the coast. As visitors come to Sefton's coast from the wider

sub-region, the impact of Sefton's Local Plan can only be determined be partly responsible for increased pressure. Any impact of increased visitor should partly be alleviated by improvement to public transport as proposed in the Local Plan.

Bring back into use derelict and underused land and buildings [SA Objective 17]

6.37 As the plan will encourage economic growth it is expected that increased investment and business interest in Sefton will help make underused [and often contaminated] land more viable to redevelop. Approximately 50% of new homes in Sefton will be built in the urban area mostly on brownfield sites. The housing requirement has also been set to account for reducing the vacancy rates in housing in Sefton at a minimum of 4%. The ability to use New Homes Bonus, or equivalent, that is secured through new development [see 6 above] will help regenerate areas of Sefton that experience deprivation and the highest home vacancy rate. It is likely to take until later in the plan period before some of the more difficult sites become viable to regenerate.

Protect and enhance biodiversity [SA Objective 18]

6.38 The Local Plan has a clear policy framework that will protect and enhance sites of natural importance. These are differentiated by levels of protection they have [i.e. International, National Local] with the highest level given the most protection. However, a number of sites are being proposed in the Local Plan, both in the existing urban area and in the current Green Belt, that have nature/habitat value. Whilst mitigation and compensation will be sought for this loss the impact of the plan in the short term will be negative, if only at a local level. Larger developments will require that new areas of open space and nature value are included as part of any developments. In the longer term new compensatory sites will also have been provided.

6.39 The plan will lead to an increase in Sefton's population and increased economic activity. The increased traffic, and visitor pressure that this will bring may have a negative impact on some of Sefton's important nature sites, particularly those on the coast. It will be important to manage this to make sure any impact is limited/negated.

Protect and enhance Sefton's culture and heritage [SA Objective 19]

6.40 The Local Plan has a policy that seeks to protect Sefton's important heritage assets. Many of the sites that have been identified for development do have heritage assets within them and there may be negative implications if they aren't considered and protected as part of development.

Provide a quality living environment [SA Objective 20]

6.41 This is a very broad objective and it essentially looks at the impact of the Local Plan on the places where people live. Many policies can impact on places where people live and in general terms these are mostly positive. The Design Quality [Place Making] policy sets out

the issues that proposals should adhere to so as to lessen the impact on existing areas. The plan also includes policies that seek to protect residential amenity from pollution, traffic or nuisance. The plan seeks to increase investment and to secure funds to continue regeneration proposals and bring back into use underused and derelict land and buildings. Proposals to secure new and protect existing services, infrastructure and open spaces will all help to provide a good local environment.

Summary

Similar to other sections of the Sustainability Report the key message that has come through this task is that the Preferred Option of the Local Plan will likely have a range of impacts on sustainability. The key significant benefits that the Preferred Option will bring include:

- Helping to improve economic growth in Sefton
- Population growth will help support our centres, businesses and services
- Increase the number of employment/training opportunities in Sefton
- Provide employment areas in accessible locations
- Make a significant contribution to reducing recent job losses in the construction sector
- Level of development proposed will bring about investment in new infrastructure
- Will help tackle inequalities, through affordable homes, new jobs, regeneration
- Will provide for a range of homes in Sefton
- Prioritise sustainable access to services and facilities
- New open spaces and areas of nature value could be formed

Some of the key negatives that are likely to occur include:

- Loss of some land that is classed as 'best and most versatile' agricultural land
- New development will generate higher levels of traffic and energy use
- New developments could bring high level of pollution to certain areas if not properly controlled
- Greater use of natural resources due to construction and more households
- Impact on countryside and landscape due to need for additional land from Green belt for development
- Larger population may result in greater visitor pressures to sensitive areas, such as the coast.
- Some areas of nature value will be lost to development

Section Seven

Monitoring

7.1 The Localism Act has removed section 35(1) of the Planning and Compulsory Purchase Act 2004 which required local planning authorities to produce an Annual Monitoring Report (AMR) for submission to the Secretary of State. The Localism Act does however still require every local planning authority to prepare reports containing information as to the extent to which the policies set out in the Local Plan are being achieved. This monitoring report will provide a basis for the:

- Identification of unforeseen adverse effects and any necessary remedial action.
- Assessment of whether the Local Plan is achieving the SA objectives
- Assessment of the performance of mitigation measures.

7.2 Figure 7.1, below, sets out the proposed indicators which will monitor the Sefton Local Plan against each of the SA objectives. These indicators are split between direct impact indicators [i.e. those that the plan can directly influence] and contextual indicators [i.e. those which have much wider influences]

Figure 7.1 Proposed Indicators for Sustainability Appraisal

Sustainability Objective	Direct Impact Indicators	Contextual Indicators
<p>1. Encourage economic growth and investment</p> <p>SEA Topics: Population, Material Assets</p>	<p>Area of land made available for employment uses</p> <p>Land developed for employment purposes</p>	<p>Number of jobs in Sefton in port and tourism sectors</p> <p>Number [%] of people employed in the public sector</p> <p>Number [%] of people employed in the construction industry</p>
<p>2. Reduce unemployment and improve skills</p> <p>SEA Topics: Population</p>	<p>Jobs created as a result of new development</p>	<p>% of population claiming JSA (by borough and wards)</p> <p>Number and location of SOAs in most 5%/10% most deprived in Employment and Education, Skills and Training domains.</p> <p>% of residents [by borough and ward] educated to NVQ levels 1 to 4</p>

Sustainability Objective	Direct Impact Indicators	Contextual Indicators
		Number of jobs in Sefton
3. Support the rural economy SEA Topics: Population, Material Assets	Area of land in agricultural use [including by land quality] lost to non-agricultural development.	The number of people employed in the rural based economy % of population in non-urban SOAs claiming JSA
4. Maintain vibrant town, local and village centres SEA Topics: Population, Material Assets, Cultural Assets	Amount and % of new retail, leisure and office development that is in, on the edge and outside of local and district centres.	Retail rankings of local and district centres Vacancy rates in local and district centres Vacancy rates of shopping parades in villages.
5. Provide the required infrastructure to support growth SEA Topics: Population, Material Assets	Community Infrastructure Levy contributions as a result development Infrastructure provided as a result of section 106 agreements	
6. Reduce inequalities and social deprivation SEA Topics: Population, Human Health	Number of affordable homes provided.	The number and location of SOAs in the most 10% deprived nationally Number of regeneration programmes [and amount of funding secured] that have land use requirements.

Sustainability Objective	Direct Impact Indicators	Contextual Indicators
<p>7. Reduce crime and improve safety</p> <p>SEA Topics: Population, Human Health</p>		<p>The total number of criminal incidents by borough and ward.</p> <p>The % of people by ward who see crime as a problem in their area.</p> <p>The number of accidents by type in Sefton.</p>
<p>8. Meet Sefton's diverse housing needs</p> <p>SEA Topics: Population, Material Assets, Human Health</p>	<p>The number of homes [including by type] built annually</p> <p>The five year housing supply figure</p> <p>The number of affordable homes built annually</p> <p>The number of G&T pitches provided</p> <p>The number of 'extra care' and other specialist older peoples' homes provided</p>	<p>Social housing waiting lists</p> <p>House prices</p>
<p>9. Provide better access to services and facilities, particularly by walking, cycling and public transport</p> <p>SEA Topics: Population, Human Health, Material Assets, Air, Climatic</p>	<p>% of new homes, offices, shops and leisure built within 600m of a bus stop or 800m of a rail station.</p> <p>New local services provided</p>	<p>The number of residents who live within 10, 20 and 30 minute travel time of essential services [schools, GP, post offices, shops, park, public transport stop etc]</p> <p>Travel to work % by mode of transport</p>

Sustainability Objective	Direct Impact Indicators	Contextual Indicators
Factors		
10. Provide environments that improve health and social care SEA Topics: Population, Human Health, Material Assets	Net change in area of accessible open space by type	Obesity rates in adults and children Mental health rates
11. Strengthen communities and help people to be involved in local-decision making SEA Topics: Population	The number of Parish and Neighbourhood Plans in preparation/adopted	Local election turnout rate
12. Adapt and mitigate to climate change SEA Topics: Climatic Factors, biodiversity, fauna, flora, soil, water, air	% of new homes, offices, shops and leisure built within 600m of a bus stop or 800m of a rail station. No. and capacity of renewable energy schemes approved Net change in open space No. of new trees as a result of development	Carbon emissions by source Travel to work % by mode of transport Average SAP rating of homes
13. Reduce the risk from flooding	No. and type of new development built in flood	No. of homes and businesses classed as at risk from

Sustainability Objective	Direct Impact Indicators	Contextual Indicators
SEA Topics: Climatic factors, Human Health, Material Assets, water	zones 2 and 3 No. of sustainable drainage systems approved	flooding
14. Reduce pollution SEA Topics: Biodiversity, Fauna, Flora, Human Health, soil, water, air	Number of new homes built within 100m and 200m of AQMAs.	No. and area of AQMAs Air quality levels at monitoring stations River quality Beach quality No. of sites with potential contamination issues No. of complaints in regard to noise and light pollution
15. Reduce waste and the use of natural resources SEA Topics: Climatic Factors, Material Assets	Capacity of new waste management facilities	Energy used by type for domestic and commercial purposes Recycling rates
16. Protect Sefton's valued landscape, coast and countryside SEA Topics: Biodiversity Fauna, Flora, Material Assets, Cultural Heritage, Landscape	No. of inappropriate developments in the Green Belt and Coastal areas No. of inappropriate developments in areas identified as in coastal change	
17. Bring back into use	The area of brownfield	Number of vacant homes

Sustainability Objective	Direct Impact Indicators	Contextual Indicators
derelict and underused land and buildings SEA Topics: Material Assets	land developed Area of contaminated land brought back into use	brought back into use
18. Protect and enhance biodiversity SEA Topics: Biodiversity, Fauna, Flora	No. of inappropriate developments in International or National [and local] designated nature sites New areas of biodiversity created	
19. Protect and enhance Sefton's culture and heritage SEA Topics: Cultural Heritage, Material Assets	Number of listed buildings demolished No. of inappropriate developments in Conservation areas	Number of listed buildings at risk No of parks with green flag status Number of enforcement cases relating to heritage assets
20. Provide a quality living environment SEA Topics: Population	Building for Life Scores achieved by new developments.	Satisfaction rating of place where people live

Section Eight

How to Comment on the Sustainability Report

8.1 This SA Report will be subject to a consultation period alongside the Local Plan Preferred Options. Comments are invited on the contents of the report, in terms of the appraisal methodology, the accuracy of the assessment of the likely significant effects of the plan and the opportunities for additional mitigation to ensure that the Local Plan is as 'sustainable' as possible. All comments submitted during this period will be considered and, where appropriate, amendments may be made to the SA scoring to reflect the comments received.

8.2 Comments can be submitted using the following methods:

By email, to local.plan@sefton.gov.uk

By post, to:

Local Plan
Magdalen House
Trinity Road
Bootle
L20 3NJ

Online at www.sefton.gov.uk/localplan

8.3 If possible responses should state that they are on the Sustainability Report

8.4 Further details regarding the consultation, including the deadline for receipt of comments, can be found on the Council's website www.sefton.gov.uk/localplan