
Report to:	Council	Date of Meeting:	16 th July 2015
Subject:	Sefton Local Plan: Submission Draft	Wards Affected:	All Wards
Report of:	Director of Built Environment		
Is this a Key Decision?	Yes	Is it included in the Forward Plan?	Yes
Exempt/Confidential	No		

Purpose/Summary

To present to Members an update of key issues arising from the publication of the Local Plan and changes which have taken place since then, prior to the Plan being submitted for examination.

Recommendations

That **Council** approve the following:

- (i) submit the Local Plan for examination using the current agreed objectively assessed needs for housing of 615 a year
- (ii) commit to an immediate review of the draft Plan
- (iii) as part of the Duty to Co-operate, collaborate with the other Liverpool City Region authorities to carry out a sub-regional Housing study, Employment study and Green Belt study
- (iv) urgently review and update the 'Consequences Study', and undertake further work reviewing the economic forecasts and related labour supply issues.

How does the decision contribute to the Council's Corporate Objectives?

	<u>Corporate Objective</u>	<u>Positive Impact</u>	<u>Neutral Impact</u>	<u>Negative Impact</u>
1	Creating a Learning Community		✓	
2	Jobs and Prosperity		✓	
3	Environmental Sustainability		✓	
4	Health and Well-Being		✓	
5	Children and Young People		✓	
6	Creating Safe Communities		✓	
7	Creating Inclusive Communities		✓	
8	Improving the Quality of Council Services and Strengthening Local Democracy	✓		

Reasons for the Recommendation:

To alert members to the implications of the 2012-based household projections which emerged after the Plan was approved for publication and to propose how to respond to these.

Alternative Options Considered and Rejected:

A. To withdraw the Local Plan to address the implications of the 2012-based household projections (published February 2015), and submit it for examination at a later date when the implications have been addressed.

B. To submit the Plan for examination as it stands and not address the implications of these recent household projections.

These, together with the preferred option, are considered in sections 6-9 of the report.

What will it cost and how will it be financed?

(A) Revenue Costs

None arising from this report.

(B) Capital Costs

None

Implications:

The following implications of this proposal have been considered and where there are specific implications, these are set out below:

Financial		
Legal		
Human Resources		
Equality		
1.	No Equality Implication	<input checked="" type="checkbox"/>
2.	Equality Implications identified and mitigated	<input type="checkbox"/>
3.	Equality Implication identified and risk remains	<input type="checkbox"/>

Impact of the Proposals on Service Delivery:

None

What consultations have taken place on the proposals and when?

Publication of the draft Local Plan: 30 January – 27 March 2015

The Head of Corporate Finance and ICT has been consulted and notes the progress report indicating comments from interested parties. At this stage of progressing the Local Plan the report does not indicate any direct financial implications for the Council. (FD 3622/15)

Head of Corporate Legal Services have been consulted and any comments have been incorporated into the report. (LD 2914/15)

Implementation Date for the Decision

Immediately following the Council meeting.

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Background Papers:

- Copies of representations submitted in response to the Publication Draft Plan <http://www.sefton.gov.uk/planning-building-control/planning-policy/local-plan-publication.aspx>
- 2012-based household projections can be viewed at this web-site: <https://www.gov.uk/government/collections/household-projections>
The relevant part is headed 'detailed data for modelling and analytical purposes'.
- NLP HEaDROOM Update Report Non-Technical Summary: Review of the Objectively Assessed Need for Housing. Sefton Council, June 2015.
- Email exchange between Alan Young (Sefton Council) and Bob Garland (Chief Statistician, Department of Communities and Local Government), 10th and 16th March 2015

1. Introduction

- 1.1 The Draft Sefton Local Plan was published for an eight week period between 30th January and 27th March 2015. In response to this stage of the Plan, we received almost 1,300 'representations' (the name to given to comments either objecting to the Plan or in support), and three petitions containing approximately 7,900 signatures.
- 1.2 The purpose of this report is to identify key issues arising during the publication period and specifically to consider the implications of the 2012-based household projections. These emerged after the Plan was approved for publication and raise major issues as to how the Plan should address them.

2. Key points raised in representations

- 2.1 This section provides a brief overview of some key representations received. It is not meant to be comprehensive. A copy of all representations will be available on the Sefton web-site by mid-July and these will be forwarded to the Inspector when the Plan is submitted at the end of July or early August.
- 2.2 Overview of representations from public bodies and other key agencies.

The Local Enterprise Partnership and Natural England broadly supported the Plan with minor qualifications.

Of those consultees who submitted representations objecting to the Plan, the following is a summary of the most significant issues raised:

- Environment Agency: expressed concern that flood risk assessments had not been undertaken for a few sites. These assessments are currently being carried out.
- Sport England: objected to former school sites being identified for development as Sefton's playing pitch study has not been completed and so it is not possible to know that such sites are surplus. This study is well underway and its conclusions will be taken into account as the Plan goes to examination
- English Heritage (now Historic England): recommended changes to a number of policy areas to ensure that the historic value of the Borough is given greater emphasis.
- United Utilities: noted the need for more detailed information on some of the larger sites identified for development before they can fully comment on the impact on their infrastructure, but stressed the need for development to reduce surface water run-off to reduce the risk of flooding.

2.3 Adjoining local authorities:

- Liverpool Council – expressed broad support for the Plan's housing requirement and employment land figures
- Knowsley Council – supported the strategy of the site and the approach to selecting the sites. Knowsley were part of a joint study with Sefton to selecting sites in the Green Belt. They noted that the Inspector at the recent examination into their Local Plan supported this approach to selecting sites in the Green Belt.

- Wirral Council – supported Sefton Council’s intention to provide for their own identified local needs for housing and employment within their Borough boundary, and requested clarification on detailed points in a number of policies
- West Lancashire Council - expressed concern about the impact the sites proposed for development north of Maghull would have on the strategic Green Belt gap between Maghull & Aughton.

2.4 Parish Councils:

- Formby Parish: objected to loss of Green Belt, the two proposed business parks, excessive development, impact on infrastructure e.g. health facilities, schools & drainage
- Hightown Parish : concerned about proposed development at Elmcroft Lane and also at Sandy Lane
- Ince Blundell Parish: concerned at the potential loss of the best and most versatile agricultural land, considered the housing requirement to be excessive, objected to loss of former school sites (Professional Development Centre & Holy Trinity, both in Formby), and concerned over the proposed gypsy and traveller transit site within Ince Blundell parish
- Lydiate Parish: objected to loss of high quality agricultural land and excessive development in its area
- Maghull Town Council: expressed concerns about the impact of the proposals on infrastructure (in particular concerns over impact on roads, schools and health facilities), loss of Green Belt and affordability.
- Melling Parish: objected to the two sites proposed in Melling village, preferring the safeguarded site at Ashworth Hospital; too much housing proposed, loss of best and most versatile land, impact on local infrastructure including drainage, roads, health services & schools
- Thornton Parish: concerned about risk of flooding on some sites, and specifically to proposed development on sites at Southport Rd, Thornton

2.5 Landowners and developers:

The following is a summary of some of the key issues identified by landowners and developers:-

- housing requirement should be updated to take account of the most recent household projections
- need for greater ‘buffer’ in its housing requirement as Sefton has consistently developed fewer houses than its target figure
- employment land requirement should be more flexible
- general support for sites from those who own or wish to develop them
- comments stating that some sites are not suitable or may not be able to developed to the capacity stated in the Plan - this approach has often been used to promote different sites and say they are preferable to those currently identified
- risks of certain sites not being able to be developed, and therefore need to consider further sites, specifically those promoted by the landowner/ developer making the representation
- lack of safeguarded land being provided in order to justify the release of further land in the Green Belt – more land needs to be provided for more homes
- flexibility to allow safeguarded land to be available earlier if allocated sites not able to be developed within the anticipated timescale
- some safeguarded land should be part of the main housing supply.

3. Views from individuals and local communities:

3.1 General comments

The main focus of comments from individuals related to the amount and location of development proposed by the Local Plan, specifically for residential development. General comments about the level of development proposed, and the amount of land identified for development within the Green Belt, included:

- refusal to accept housing numbers
- there should be a 'brownfield first' policy
- there is no shortage of housing; many houses vacant & for sale - why build more?
- a view that the statistics used to justify the Plan are flawed.

3.2 Overall comments on sites proposed for development included objections to the loss of Green Belt land, loss of best and most versatile agricultural land, disruption to residents during building work, loss of view, impact on quality of life, loss of recreation space, impact on house price, not suitable location for affordable homes, strain put on local services such as schools, GPs, public transport, unequal distribution of sites across Sefton, homes not needed at the scale proposed and the preference to use brownfield sites over greenfield.

3.3 There were a small number of supporting representations including those who would wish to see more homes, including affordable homes, employment areas and investment in local facilities and infrastructure. There was also support from those promoting sites and general support for brownfield sites (e.g. the former Philips Factory site, Churchtown; 'Prison site', Maghull).

3.4 The section below picks out some of the key specific comments on a number of the housing and employment allocations. This list is not intended to be comprehensive, either in terms of the comments or the sites. It is intended to provide a broad overview of the most common issues raised during the consultation, primarily by residents.

Site specific comments

3.5 All these sites relate to sites identified for housing unless otherwise stated. The 'MN2' reference for each site refers to Policy MN2 in the draft Plan.

MN2.2 Bankfield Lane, Churchtown

- Impact on local wildlife, sewers can't cope, high flood risk and poor drainage, impact of traffic on Churchtown, damage caused by vibrations (traffic and piling)

MN2.4 Land South of Moss Lane, Churchtown

- Impact on ecology, flood risk, poor site access (Moss Lane is not wide enough), poor ground conditions, local traffic network unable to cope, poor access to local services, impact on Southport Old Links Golf Course, loss of

gap to neighbouring settlements, impact on Meols Conservation Area, damage caused by vibrations (traffic and piling)

MN2.7 Lynton Road, Birkdale

- Poor access and danger on local roads due to more traffic, impact on local wildlife, new development unlikely to be in keeping with existing homes, localised flooding problems, poor location directly adjacent to rail line

MN2.8 Former Ainsdale High School

- Preference for the site to be used for a Community Wildlife Reserve, traffic and access problems and impact on level crossing, loss of playing fields, need to retain school for possible future re-use

MN2.11 Land South of Moor Lane, Ainsdale

- Traffic issues (particularly the junction with Liverpool Road), impact of nature (e.g. loss of ponds on site), new development would 'jump' a good Green Belt boundary and cause urban sprawl

MN2.12 Land North of Brackenway, Formby

- Flood risk, impact on local nature, loss of viable equestrian business, traffic problems('rat running') and poor access, proximity to airfield

MN2.16 Land at Liverpool Road, Formby

- Flooding issues, concern that flood risk maps were changed, impact on junction with Bypass, importance of this site to the setting of Formby

MN2.19 Land at Andrews Close, Formby

- Impact traffic would have at railway crossing, poor access to site, flood risk and poor drainage

MN2.48 and MN2.49 Land East of Formby (Employment Sites)

- Some support for new football facilities south of Altcar Lane
- Flood risks on site, impact on nature, threat of retailers on sites to Formby centre, danger of having access direct onto Bypass, sites not accessible to Formby residents who would have to cross busy road

MN2.20 and MN2.21 Hightown Sites

- Elmcroft Lane is not suitable for increased traffic, potential loss of wooded area, no school in Hightown, scale of development would alter the nature of the village, drainage problem, impact on nature

MN2.23-26 Thornton Sites

- Would negate any benefits the new road will bring, impact on wildlife, flood issues, impact on Crematorium

MN2.27 Turnbridge Road, Maghull

- Access to Turnbridge Road is restricted, roads over canal not suitable for more traffic, impact on listed buildings nearby, continued loss of Lydiate's character, flooding problems (the canal has burst its banks in the past)

MN2.28 and MN8.1 Land North of Kenyons Lane/ Lamshear Lane, Lydiate

- Impact on local heritage and Lydiate village, loss of jobs at the dairy, loss of gap with villages in West Lancashire

MN2.29 and 2.46 Land to the East of Maghull (includes Employment Site)

- Scale of development too large, disproportionate; site can only be accessed by narrow country lanes, not a suitable location for a business park, site contains a brook which sometimes floods, concern that policy does not require affordable homes on this site

MN2.30 and 2.31 Melling Sites

- History of sewerage capacity in this area, additional traffic in the village would be unsafe, village hasn't the facilities to cope, impact on village heritage/character

3.6 Proposed additional employment sites

Two additional employment sites were also proposed for inclusion in the Local Plan, and will be considered at the examination although it is not proposed by the Council that they should be included in the Local Plan at this stage.

Land east of Formby Bypass (referred to as Site B in the next paragraph and on the plans which follow):

A totally new site south of the proposed Business park (which itself is south of Formby Industrial Estate) was proposed on the basis that the employment requirement of 84.5ha should be increased in order to support economic growth in the borough, encourage inward investment, maximise the benefits arising from SuperPort and generate jobs for local people.

Site proposed by Peel Holdings, east of Switch Island (referred to as Site L in the next paragraph and on the plans which follow):

This site was submitted at the Preferred Option stage and consulted on as part of the 'Additional sites' consultation in summer 2014. Whilst the draft Local Plan did not identify this site for a port-related business park, many residents expressed their concern about the impact the potential development of this site would have. The primary concerns included the loss of agricultural land, closing the gaps between Aintree, Melling, Maghull and Kirkby, the impact on the existing settlements of the increase in traffic, impact on the landscape and the risk from flooding.

Many residents also wrote to express their support that the Council did not include this site in the Local Plan.

3.7 Sites proposed which are not included in the draft Plan

This is a list of alternative/new sites proposed by landowners/developers, together with the size of the site in hectares (ha). These are shown on plans of Formby and Sefton East Parishes (also including a site in Thornton) on the following two pages. All these sites are promoted for homes except sites B and L which are promoted for employment use. These sites are not being included in the Plan but these representations, as with all others, will be forwarded to the Inspector to be considered as part of the examination.

A. Land at Southport Old Road, north east of Formby* [5.73ha]

B. Land east of Formby Bypass [south of MN2.49]* [17.80ha]

C. Land south of Liverpool Road, Formby* [30.49ha]

D. Land at Shorrocks Hill, Formby* [5.43ha]

E. Land north of Kenyons Lane, east of Northway, Lydiate [36.10ha]

F. Land to the West of Maghull [50.90ha]

G. Damfield Lane, Maghull* [1.63ha]

H. Land at Edge Lane, Thornton [4.28ha]

I. Land at Chapel Lane, Netherton [0.79ha]

J. Land at the Crescent, Maghull [5.99ha]

K. Land at Melling Lane, Maghull [3.32ha]

L. Lane to the East of Switch Island, adjacent to Brewery Lane, Melling [47.66ha]

M. Oriel Drive, Aintree [19.26ha]

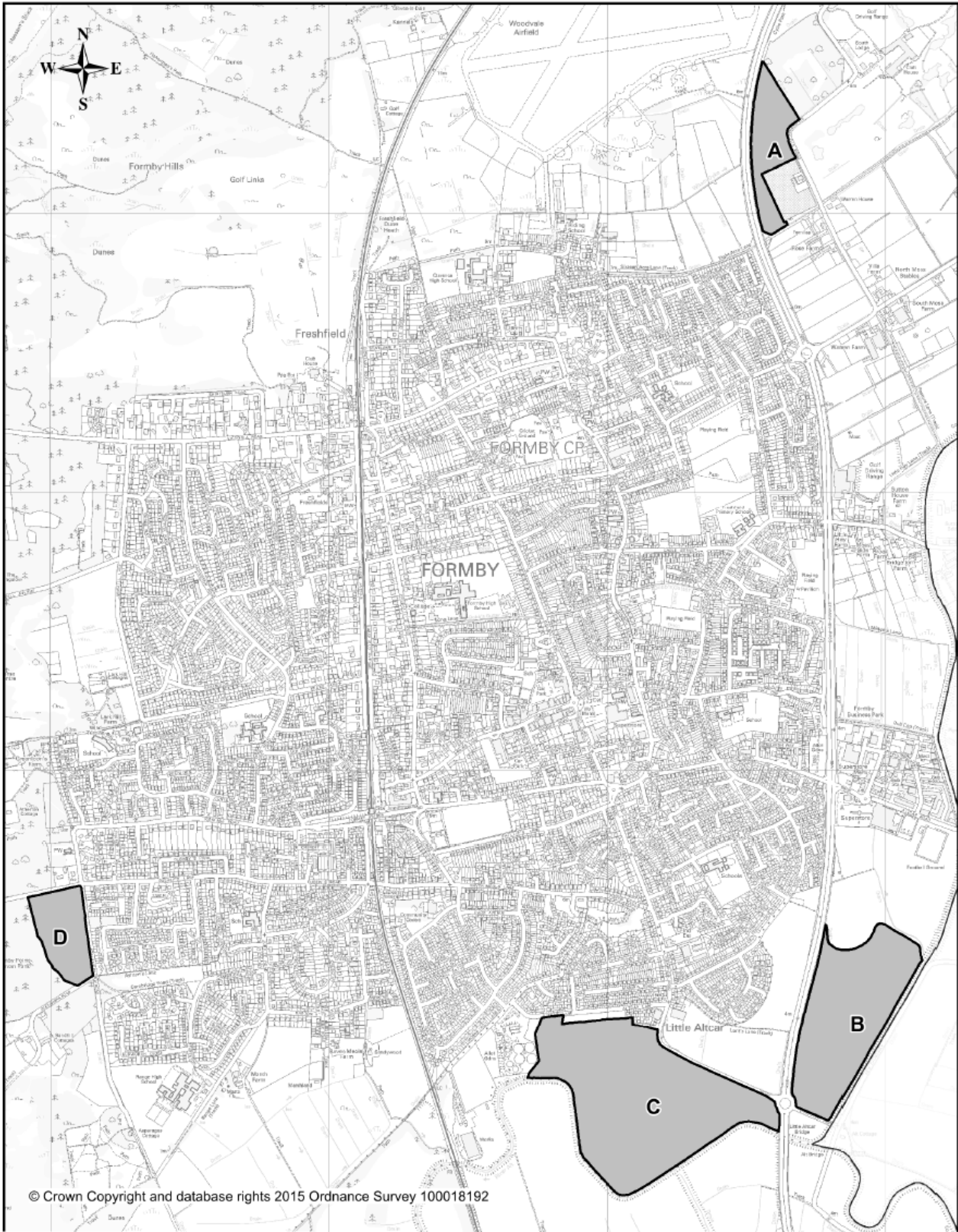
N. Lane to West of Bull Bridge Lane, Aintree [4.31ha]

O. Land to East of Bull Bridge Lane, Aintree [22.58ha]

P. Land at Mill Farm, Aintree [4.74ha]

Q. Land South of Wango Lane, Aintree [7.89ha]

**These sites have not been proposed before, either by the Council or developers*



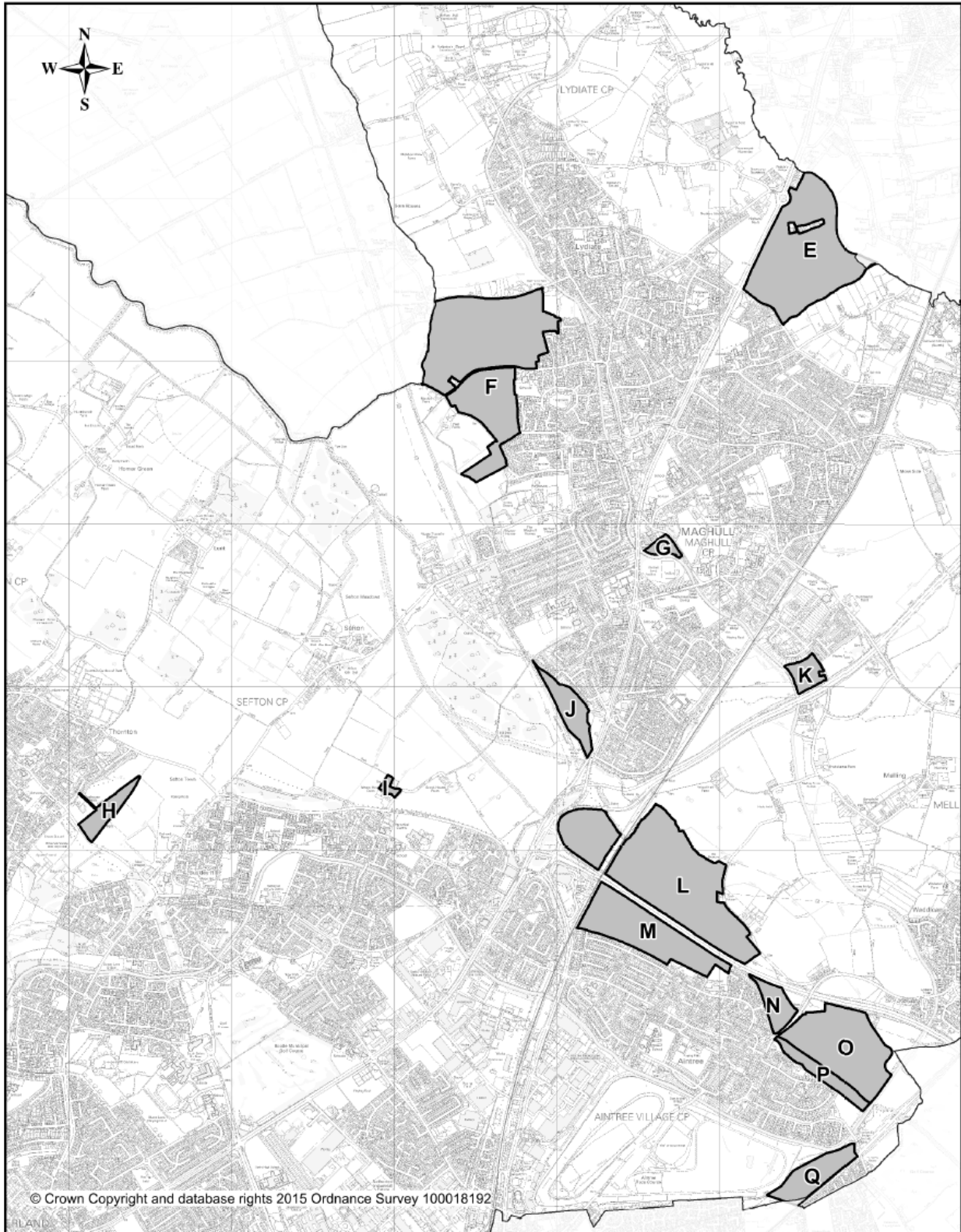
Sefton Council



**Department of the
Built Environment**
 Derek McKenzie
 Interim Head of Planning Services

Additional sites proposed by landowners/developers during Local Plan Publication Stage - Formby

Date: 1st June 2015

Scale: N.T.S.



Sefton Council	Additional sites proposed by landowners/developers during Local Plan Publication Stage - Sefton East and Thornton	
 Department of the Built Environment Derek McKenzie Interim Head of Planning Services	Date: 1st June 2015	Scale: N.T.S.

4. Further studies planned / underway

- 4.1 To support the Local Plan as we approach examination and its implementation (which will in part be through Supplementary Planning Documents), a number of further studies are underway or due to be commissioned very soon. These are largely due to be completed by the autumn in time for the examination.

Update of Housing Requirement

Update of Sefton's housing requirement to take account of the recently published Household Projections by the Department for Communities and Local Government (background paper to this report).

Independent Review of Urban Housing Capacity

A review of possible additional sites in the urban area to assess if any sources of land/housing supply in the existing towns and villages have been overlooked.

Assessment of Highways Network Capacity

An assessment of the implications of the proposals in the Local Plan on selected parts of Sefton's highway network to complement work previously commissioned and to identify locations where improvements may be needed.

Specific Transport Modelling in Southport and Formby

A study to assess the detailed impact of proposed development in Formby and Southport and to determine what improvements may be needed.

Employment Land and Premises Study Update

Update of the 2010 study which was refreshed in 2012.

Assessment to consider scope and level of Community Infrastructure Levy

Additional work to determine the potential for Community Infrastructure Levy and the level at which it might be set in Sefton.

Retail Update work

Updated Health Checks for Sefton's town and district centres and a review of out-of-centre retail size thresholds proposed in the Local Plan.

Assessment of the demand for Custom Build Homes in Sefton

Assessing if there is any demand in Sefton for people who wish to build or commission their own homes, and how and where this need can be met.

5. Update on infrastructure

- 5.1 Many residents raised concerns that services and infrastructure would not be able to cope with an influx of additional residents. The Council will continue to liaise with infrastructure providers in order to ensure that services and infrastructure can be provided when they are needed.
- 5.2 A number of meetings are currently taking place with infrastructure providers to enable them to consider comments made during the recent publication of the draft Plan. In many cases infrastructure providers can only provide broad guidance and support at this stage in the absence of detailed plans, but are committed in principle to meeting the infrastructure required for development once the detailed needs are known.
- 5.3 The Planning Department will continue to work closely with such organisations throughout the plan period and to support planning applications as they are submitted. Planning for infrastructure is not a short term exercise that has to be completed and 'finalised' by time the Local Plan is submitted. A further update will be provided before the examination and will be reflected in a revised version of the Infrastructure Delivery Plan. This will continue to be updated as the Local Plan is implemented.

6. Implications of the 2012-based household projections

- 6.1 On 22nd January 2015 the Council resolved to approve the draft Local Plan for publication and then submission to the Secretary of State for examination "subject to there being no material change of circumstances".
- 6.2 A material change in circumstances has in fact occurred in the form of the updated household projections released by the Department of Communities and Local Government (CLG) in February 2015. These 2012-based projections had been anticipated, and it was expected that the housing requirement figure contained in the draft Plan would be able to accommodate any modest change which might result from these updated projections.
- 6.3 Over the full 25 year period 2012-2037, these household projections project annual household growth in Sefton of 533 per annum. This is a significant increase on the previous 2011-based (Interim) projections (400 household per annum [hpa] between 2011 and 2021) and the 2008-based household projections (323 hpa) between 2008 and 2033. When comparing the 2012-based projections (533hpa) with the 2008-based projections (323hpa) – the last full set of household projections - this is a 65% increase, one of the highest rises experienced by any authority in the country (see background paper).

- 6.4 This does not mean future household growth will be 65%. In fact according to CLG statistics, over the period 2012 to 2037 Sefton's households will grow 11%, a much smaller rise than the UK average of 24%. The issue the Council must address is the changes consequent from the updating of the 2008 to 2012 based household projections. Sefton does not face the same scale of future housing need which will be faced by many other authorities which are expected to have much higher rates of future household growth arising from these latest projections; however, given the undoubted constraints affecting the borough (which may not be present in some other local authorities) we will face a major challenge in accommodating them.
- 6.5 This unexpected rise relates in large part to under-recording of population in Liverpool during previous population projections and the incremental net migration to Sefton arising therefrom. This only came to light as information from the 2011 Census fed through into the most recent projections. This has been compounded by an ageing population and other trends in household formation in Sefton which has resulted in a growth in smaller households. The cumulative effect of all of these various factors has been significantly higher levels of household growth in the borough than shown in previous household projections.
- 6.6 The Council's consultants NLP have previously calculated the level of "objectively assessed needs" for housing in Sefton. They updated their analysis to take account of the latest household projections. However, any update of this kind should also reflect latest employment forecasts, as required by paragraph 158 of the National Planning Policy Framework (NPPF). These employment forecasts, and the consequent labour supply implications, have also gone up significantly since earlier forecasts which were reflected in the housing land requirement contained in the draft Local Plan.
- 6.7 These employment forecasts and the consequent labour supply implications have gone up very significantly since earlier forecasts which were reflected in the housing land requirement contained in the draft Plan. Specifically, the Cambridge Econometrics economic forecasts used in the 2012 Employment Land and Premises Study Refresh which informed previous NLP work, were based on a suggested borough employment increase of some 3,400 jobs over the period 2011-2031. In comparison the "blended average" of the most recent 2015 Experian and Oxford Economics forecast models used in the latest NLP work predict 10,099 jobs growth in Sefton in the period 2012 to 2030. This is an increase of almost 300% and reflects the current much more positive outlook for the economy, compared to the position in 2012. In particular, it reflects the expected sharp period of growth projected for 2013-2016 as the UK recovers from recession.
- 6.8 The Council's current housing land requirement is 615 a year. The consequence of the various factors identified above is that the objectively assessed needs for

housing rises to 690 a year (based on a purely demographic assessment unrelated to any economic growth). If the latest employment scenarios are factored in, this rises to between 710 to 1,290 a year, depending upon the extent of that growth. These are the figures (710 – 1,290) which NLP conclude should provide the range of objectively assessed needs for Sefton, and within which the Council should determine its “housing requirement figure”.

- 6.9 These updates have provided the Council with very significant new information which it could not reasonably have anticipated when approving the Plan in January 2015, a view confirmed in an email exchange with the Chief Statistician from the Department of Communities and Local Government in March 2015 (see background paper). This suggests a revised housing requirement which is significantly in excess of the current housing requirement of 615 dwellings a year, as hitherto agreed by the Council.
- 6.10 Although the suggested new range is much greater than the figure in the draft Local Plan, and seems difficult to reconcile with previous assessments, this range is not disproportionate when compared to the housing requirement of other north-west metropolitan authorities, as set out in the table below.

NW Local Authority	Population (2011 Census)	Housing Requirement (per annum)
Sefton	273,790	
Wigan	317,849	1,000
Trafford	226,578	678
Cheshire West & Chester	329,608	1,100
St Helens	175,308	570

7. Possible options

- 7.1 There are three potential options as to how the Council might respond to this updated analysis of objectively assessed needs for housing:

OPTION 1 - Withdraw the Plan.

- 7.2 This would allow for the new figures to be fully considered in a revised Local Plan. However, this approach would lead to significant delay and uncertainty, and potentially to ‘planning by appeal’ as a new plan is prepared. It would result in an unacceptable delay in plan-making with all the attendant problems of not being able to guide development to appropriate locations. There would be a consequent

and significant need for evidence to be updated. It would also mean that all the housing (including affordable housing) and employment development which is ready to take place as soon as the Plan is adopted would be put on hold for a minimum of 18 months.

- 7.3 The consequences of withdrawing the Plan at this far advanced stage are of a major delay in getting an adopted Plan for Sefton by 18 months – 2 years, risk of not being able to guide development to appropriate locations through not having an up-to-date plan, cost of up-to-dating evidence and delay in securing the new homes and employment (to meet the borough's needs) which are contingent on the Plan being adopted. This is considered to be an unacceptable option and should not be pursued, unless there is no other option.

OPTION 2 - Proceed with 615 dwellings a year as the Council's 'objectively assessed need'.

- 7.4 This would be a very high risk approach as the housing requirement figure of 615 is now out of date and based on national projections that have been superseded, notwithstanding that it comprised the objectively assessed need at the time of the resolution in January 2015. The figure of 615 was the appropriate housing requirement figure at the time the draft Plan was approved, but this is no longer the case. To continue with the figure of 615 would almost certainly lead to an unsound Local Plan as it would not comply with the National Planning Policy Framework, (NPPF), paragraph 158, which requires up to date and relevant evidence to support a Local Plan.
- 7.5 An Inspector would be likely to find that a Plan submitted on this basis would be 'unsound', and would ask the Council to re-do its Plan to take account of a higher housing requirement. The Inspector would be likely to advise the authority of this following an "exploratory meeting" which is expected to be in September. (S)he would almost certainly ask the authority to go back and review the Plan to take account of objectively assessed needs. This has happened to many authorities who have failed to base their plans on the most recent evidence of housing needs.
- 7.6 The consequences of this Option would be very similar to Option 1, but would be delayed until the Inspector formally advises the authority of this course of action. It is therefore recommended that this option should also not be pursued.

OPTION 3 - Submit the Local Plan as it stands on the basis that it would be impossible to meet needs in full, at least in the short term, but commit to an immediate review linked to wider sub-regional work

- 7.7 It is open to the Council to promote a plan which does not meet the full objectively assessed needs provided that to do so would be consistent with other policies in

the NPPF. This approach still carries risks, but there are a number of arguments which can be advanced in its favour:

- Environmental limits: If Sefton had to meet a significantly higher housing requirement inside the Borough boundaries it would have an unacceptable impact on the environment – there is a limit to what the Borough can reasonably accommodate. The land required to meet this would have to be found almost entirely through additional Green Belt release. In practical terms there are no or very few potential additional sites that could be allocated in Southport, Bootle, Netherton, or Crosby, and only a small number in Formby. The vast majority of potential additional sites are in Sefton East (Maghull/Lydiate, Aintree, and Melling), which is already proposed to take the largest proportionate share of the housing allocations relative to its existing population. There is a point at which the local market in this area would become saturated and unable to absorb the number of houses required, even if additional sites were identified. Therefore, in order to meet a significantly higher land requirement it would be likely that land would have to be identified in adjacent Boroughs.

- Duty to Co-operate: Further to Section 110 of The Localism Act 2011, local planning authorities have a statutory duty to co-operate with each other in relation to planning of sustainable development, with specific reference to co-operation in relation to plan-making. This “duty to co-operate” is clearly set out in the NPPF:

Para 178: “Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the **strategic priorities** set out in paragraph 156 (*this includes ‘the homes and jobs needed in the area’*). The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.

Para 179: “ ... Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas - for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework”.

As part of a well-established commitment to cooperate to meet this obligation, the officers of the Liverpool City Region authorities are currently finalising a ‘Statement of Cooperation’ committing them to undertake a joint assessment of housing need, and to review respective Local Plans following this if required. This process is already in motion and would provide the mechanism for adjacent districts to explore the potential for addressing those needs which cannot be met in Sefton.

- Commitment to immediate review of Plan: The draft Plan already contains a commitment to an early review of the Plan to take account of a sub-regional study of Port related uses, and paragraph 4.44 of the Plan states:

'This early review will also be able to take account of the findings of a future sub-regional strategic housing market assessment, should this imply a significantly higher housing requirement'.

This commitment therefore already exists, and can be strengthened to include reference to an immediate review which could take place as soon as the findings of the sub-regional study have been finalised (late 2016 onwards).

- Implications of delay for investment in homes and jobs: The latest NLP report, and the statistics that underpin it, have emerged very late in the Plan preparation process. We could not have foreseen this magnitude of change in advance. The implications of delaying further at this stage for housing delivery and investment in the Borough would be severe. If the Inspector were to allow the Plan to proceed in its current form, with a commitment to immediate review, it would allow for the identified sites to be removed from Green Belt and developed for the benefit of the local housing market and economy thereby meeting short term needs.
- Legal precedent: There is legal precedent to support this approach. In the case of *Grand Union Investments Ltd -v - Dacorum BC [2014]*, the High Court considered whether a local planning authority could lawfully adopt its local plan without first having assessed the full housing needs of its area and whether those needs could be met but committing itself to an early review in which that work will be done. The High Court held that a local planning authority could lawfully do so. Inspectors have found other plans sound subject to an early review in co-operation with neighbouring authorities, to fully address objectively assessed needs for housing (e.g. Hertsmere 'Revised Core Strategy', December 2012, and Suffolk Coastal 'Core Strategy and Development Management Policies Development Plan Document', June 2013).

7.8 Risks:

- There have been discussions by the officers of the Liverpool City Region authorities about participating in a joint Green Belt study consequent on the outcome of the sub-regional Strategic Housing Market Assessment, though no formal timetable has yet been agreed.
- The Inspector may take the view that, for the reasons outlined above, this is a reasonable approach which enables a Plan to be adopted and allows important development to go ahead while further work is being undertaken. Alternatively the Inspector might decide that it is essential for Sefton to agree a revised housing requirement to take account of the recently available household projections before the Plan can be examined.

7.9 Further work to support this option:

- The Council carried out a Consequences Study in 2013 to identify the implications for Sefton and adjoining authorities of various options, before the Council decided on its Preferred Option. It is recommended that the Council

commission an update of this study to fully assess the implications of meeting or not meeting a significantly higher housing requirement in the Borough. This should be undertaken urgently to be available before the examination hearings start (anticipated to be November).

- A further piece of work should also be commissioned, specifically to review the robustness of the economic forecasts for Sefton and the related labour supply issues, to help the Council determine where the housing land requirement figure should be within the range of 710 – 1,290.

8. Conclusions in relation to the 3 Options

- 8.1 Having taken legal advice, Option 3 is the recommended Option. This Option has the lowest level of risk, albeit it still carries a significant risk. This offers the best chance of getting a Plan in place and it will allow the Council to further address its objectively assessed needs, through an immediate review of the Plan, in a co-ordinated manner across the Liverpool City Region.
- 8.2 The Local Plan should therefore be submitted for examination using the current agreed objectively assessed needs for housing of 615 a year. At the same time it is acknowledged that a higher range of objectively assessed needs has been recommended for Sefton, based on economic needs, which the Plan will not meet.

9. Required action

- 9.1 If the Council agrees to proceed with Option 3, it is important that this is followed up with specific action, as set out below.
- 9.2 The Liverpool City region authorities are already committed at officer level to carrying out a sub-regional strategic housing market assessment and employment study. The Council will continue to work closely with the other authorities to urgently agree a timetable for these studies including a sub-regional review of the Green Belt.
- 9.3 The Council will commission, without delay, further studies as set out in paragraph 7.9. These comprise updating the Consequences Study and assessing in more detail the implications of the economic forecasts for the need for new homes in the Borough.

10. Next steps

- 10.1 If the Council agrees to Option 3, the Plan can be ready to be submitted within 2-3 weeks. The Inspector expects the key issues arising from people's comments to be summarised and made available at the time the Plan is submitted, and all relevant background evidence also must be made available to the Inspector and

to members of the public.

10.2 The examination begins as soon as the Plan is submitted. The Inspector will carry out an initial assessment of the Plan. If (s)he wishes to query any aspect before the formal oral examination, (s)he will hold an exploratory meeting.

10.3 These are the key dates for the next stages:

- End of July/ early August: submit Plan for examination
- Early September: possible exploratory meeting with Inspector
- Start of oral examination: early November.