Please find below my comments re the Formby and Little Altcar Neighbourhood Plan

It appears that the Plan makes several statements which are in fact the opinion of the author rather than fact. The Neighbourhood Plan should be evidence-based not based on opinion.

On Page 1 it says 'Unfortunately the Planning system in its current form is unable to take an holistic approach when addressing flooding and flood risk to the community'. Where is the evidence for this?

On p25, section 3.1.3, it states "The perception is that many new developments are skewed towards larger dwellings. This is the case in Formby compared with the rest of the borough." Which new developments is this referring to? All the local plan sites will have a mix of dwelling size as per the requirements of the local plan. Where is the evidence that developments are skewed towards larger dwellings over and above the impression that FRAG councillors themselves have tried to give to the public. The local plan says sites should have 25% 1 or 2 beds and 40% 3 bed and that is the mix that has been achieved on the one large site in Formby that has progressed that far (Andrews Lane).
To say "this is the case in Formby compared with the rest of the borough" are they saying that sites in Formby are majority 'larger dwellings'? If so where is the evidence.

Support for housing
P7 1.2.5 it says "this plan does not allocate land for housing or employment but works with the various site allocations in the Sefton Local Plan which has been through a public enquiry."

There are several statements about flooding which don't appear to be backed up by evidence.
3.2.7.5 - "All water that enters Formby will eventually enter the River Alt"
3.2.7.6 "When the River Alt is running high enough to close the non-return flap valves, no water can leave Formby until the water level in the River Alt drops."
3.2.9.5 "Formby has well documented problems with watercourse locking."
3.2.10.4 - "Raising of land levels will push water elsewhere making flooding more likely"
3.2.10.4 paragraph d "Ground water storage systems are likely to cause additional flooding problems elsewhere."
3.2.11.6 - "(When the exception test is invoked) The Local Planning Authority know that the problem has not been solved and will make the flooding situation worse."
p58 4.8 "Given that roughly 25% of Formby is below high tide level there is a further risk of tidal flooding."
4.8.7 "Flooding occurs at significantly greater frequency than is claimed on the flood maps".
4.8.10 "Formby sits in a bowl of low lying saturated land with a high water table... During prolonged rainfall no water can leave Formby ... soakaways that serve the housing estates adjacent to the development sites fail, causing... flooding leading to foul water discharge from sewers."
4.8.11 "Preloading of the ground.... will cause increased flood risk to existing properties" p61 "It is clear that the same quantity of water being concentrated in a smaller available area will cause increased flood risk to existing properties"
"It has become apparent through the planning department and committee that there is a failure to follow their own policies in the local plan and when questioned we are told that they are only for guidance"
Evidence should be provided for the above statements.

Further comments:
On p34, section 3.2.9.2, it states: "Such water retention systems are often categorised as "reservoirs" and are therefore counted as a potential source of flooding." Are any "reservoirs" of that size planned for Formby?
3.2.10.1 "Priority will be given to information based on proven local knowledge rather than assumptions based on principles brought in from dissimilar areas."
Whose local knowledge are they expecting to rely on? Will it be evidence based? By "assumptions" do they mean modelling which is evidence-based? They want 'local knowledge' (opinion) to take precedence over evidence.

Support for housing and Sefton's local plan
p38 3.4.1 The "Vision Statement" states "In 2031, Formby will have grown to become a sustainable town that is able to meet its own needs for housing, jobs, community facilities, public and commercial services... It's population will have reached over 25,000 with 11,000 homes" This is explicit support for the local plan's 1,000 new homes for Formby.

p39 3.4.3 "Objective" to "provide new housing as per the Sefton Local Plan."
It also states as an "Objective" : Provide a greater range of affordable housing."
What is meant by this? Affordable housing in Sefton as per the local plan means 80% social housing and 20% intermediate (part rent part buy). Does this NP objective mean the PC thinks this should be broadened to include other types of "affordable" housing eg housing that is sold at 80% market value? I support the local plan's 80% social rented and 20% intermediate mix not a widening of the definition to include other homes that are actually less affordable due to being sold on the open market. There is a need for more social housing in Formby which offers more secure tenancies and better oversight of the maintenance of homes and help for people who live in them.

p43 "A Spatial Plan For the Town" states the the NP "promotes infilling up to (Formby's) settlement boundary the A565" - this is explicit support for the Liverpool Rd site. It goes on to say that "This approach, taken together with the housing allocations below, provides for sustainable growth ... whilst protecting the green belt from inappropriate development." Explicit support for Sefton's local plan.

p45 4.3.2 "The NP strongly supports sustainable growth and in doing so supports the delivery of more housing than that set out in the local plan."
As the NP is not allocating sites for development, where would they suggest these extra houses are built? Greater density on the sites already allocated?

4.3.5 -"The Sefton Local Plan required approx 640 dpa but the Inspector ordered that a sub-regional assessment be made (SHELMA). This produced a figure of 594 dpa which is significantly lower than the figure produced by the local plan."
This is irrelevant because there is a range of evidence is used to assess housing need. 594 was in no way suggested to be the definitive housing need. This statement should be removed.
"Formby's population is continuing to age" This is due to a lack of homes for younger people to move into which would be improved by new development (affordability will also improve through increase in supply)

Fracking
There is NO definitive policy opposing fracking. In fact the NP suggests Fracking applications will be supported "if there is evidence that it comprises sustainable development that the local community needs"

Sports facility
"The PCs ... will produce a sports facility strategy within 6m of the NP being adopted"
Where is the evidence that the public want this? The PCs own consultation showed that it was not supported by the community if it were to be publicly funded.

"Developer contributions will be sought from new residential developments to fund a sports strategy and implementation".
Developers can be asked to contribute to infrastructure that is necessary to make the planning application acceptable in planning terms eg to fund new school places or road widening/safety schemes or flood protection. Does the NP require money to be spent on a sports site rather than road/drainage improvements?

"development should not take place within 250m of a flood zone"
What type of 'development' - newbuilds only? house extensions?
"Flood zone’ - everywhere is a flood zone (1,2 or 3)
This would mean no development of any type anywhere.
"Encouraging building within those distances will result in new properties being difficult to insure."
Where is the evidence for this?

I would like the Inspector to take into account the above comments.

Many thanks

Labour councillor for Ravenmeols ward, Sefton MBC

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