Sefton Council,
Local Plan Team,
Magdalen House,
30 Trinity Road,
Bootle,
L20 3NJ

Dear Sir or Madam,

Formby and Little Altcar Neighbourhood Development Plan – Submission Draft

Thank you for notifying the National Trust about the above consultation. We have reviewed the plan and set out our comments below.

The National Trust

The National Trust is a charity and Europe’s largest conservation organisation with a current membership in excess of 5.2 million people. With the support of our Parliamentary Act we are legally responsible for the protection of some of the most beautiful, historically important and environmentally sensitive places in England, Wales and Northern Ireland. This is made up of nearly 250,000 hectares of land, including 700 miles of coast and 300 historic buildings.

National Trust and the Formby Coast

The Trust looks after over 400 hectares of land along the Formby Coast (shown in appendix 1). It’s ever changing landscape, sculpted by tide and wind, with a backdrop of pine green dune woodland provides a natural habitat for red squirrels, elusive plants, insects, reptiles and various amphibians.
Among this fragile habitat is evidence of a cultural history stretching back thousands of years; from tracks in shoreline silt-beds revealing the presence of an ancient marsh trodden by hunter gatherers, to the fields levelled by generations of asparagus farmers.

Today Formby is cherished as a favourite seaside destination for locals and those from further afield; a place for a simple family day out, exercise and relaxation, and somewhere to gaze across the sea and experience in every season a dynamic landscape and to find a sense of remoteness and seclusion.

Comments on the Neighbourhood Plan

Vision for Formby and Little Altcar
As one of the fast changing coastlines the Trust cares for, we consider coastal change to be one of the most pressing issues within the plan area. The mobile sand dunes provide an important habitat for some very rare wildlife. They also function as an excellent natural sea defence for the residential area of Formby. However this dynamic system also creates issues in terms of managing access to the coast as paths, car parks and other features become buried as the sand dunes roll back inland. We believe that an adaptive approach, which anticipates the impacts of coastal change is the best way to secure the multiple benefits of access and enjoyment, conserving dune habitats and biodiversity and maintaining a resilient, connected dune belt as the primary sea defence in the long term.

We would encourage the NDP to engage more fully with this extremely important issue which aligns closely with all five core objectives and is fundamental to the delivery of the plan's vision. It is suggested that section 3 includes more background to this effect and some recognition of the careful balance required to look after the internationally important habitats and sea defences, while also providing sustainable access and facilities for residents and visitors.

Housing
Policy H7: sits within the suite of policies relating to residential development; however it is not clear in the policy text whether this policy relates solely to residential development or whether it applies to all development within the plan area. This needs to be clarified. If it is intended to apply to all types of development, the policy would be better placed elsewhere in the NDP for the purposes of clarity.

Working and Shopping
WS Community Action 6: we are pleased to see that the important role of Formby as a visitor destination and tourist attraction is recognised and supported, however the wording of this action is misleading. Traffic nuisance and visitor pressure is not just confined to Lifeboat Road. In our view, the pressures are higher elsewhere including at Victoria Road where access to the car park is often heavily congested during peak visitor times. This will only increase with coastal change.
Formby is an extremely popular visitor destination for many thousands of people every year who come to enjoy the glorious beaches, dramatic sand dunes and rich wildlife within a spectacular setting. Managing visitor demand in the most sensitive and appropriate way is therefore a key priority for the Trust.

We would encourage the provision of more accessible green open spaces within the local area generally and would support initiatives which encourage visitors to the coast to use Formby town centre. However, there remains a need to manage visitor/recreational pressures at existing sites. The Trust is currently looking at ways of doing this in the most sustainable manner with involvement from the local community.

**Getting Around**

Policy GA1: the Trust supports the principle of enhancement of existing and provision of new public rights of way provided this takes account of environmental sensitivities. This policy could also help manage visitor pressure in a sustainable way. In particular we would strongly encourage greater emphasis on promoting west to east routes and facilitating access to the strategic cycle network, railway stations and town centre from Formby’s coast. Care needs to be taken when planning new or upgrading existing routes of any sort into the SSSI, SAC, RAMSAR, SPA, and Local Wildlife Sites to ensure that this does not increase pressure on these areas.

Policy GA3: ideally pedestrian and cycle routes will not share the same routes as vehicles. Each opportunity needs to be considered with separate routes, for example, Long Lane which is potentially attractive and provides safe linkages for pedestrians and cyclists. If segregated routes are felt to be unsafe because they are secluded, this should be addressed through design, lighting and encouraging use of them.

GA Community Action 3: should encompass visitor needs in addition to those of residents, particularly during peak visitor periods to alleviate some of the pressures highlighted above.

**Environment, Sustainability and Design**

Policy ESD4: given the ecological significance and high quality landscape, the wording of this policy is considered particularly weak. We would suggest it includes specific reference to landscape/seascape character and the need to conserve important habitats and species when considering development proposals. It is our view that fracking raises significant different issues to those involving renewable energy projects therefore should be included as a separate policy.

Policy ESD6: is generally supported, particularly the need to conserve the integrity of internationally important nature sites. However, as per our comments above, there remains a need to manage sensitively recreational/access pressures at existing sites by both visitors and local residents. The provision of more areas of public open space is unlikely to significantly reduce these pressures.

Policy ESD7: the management of trees and woodland on the coast is guided by the principles set out in the Sefton Coast Woodland Plan and detail is recorded in the National Trust’s Woodland Management Plan which is currently under review and will be subject to
further consultation. Management of the woodland needs to take account of coastal change adaptation especially in the vicinity of Victoria Road.

I trust that you will give full attention to our comments. Please do not hesitate to contact me if you require further information.

Yours sincerely,

[Signature]

[Name]
Assistant Planning Adviser