Re: Formby & Little Altcar Neighbourhood Plan

Dear Sir/Madam

I strongly support the proposed Formby and Little Altcar Neighbourhood Plan and its policies.

The Sefton Local Plan following the advice and presentation given by their consultants Nathaniel and Lichfield and Partners was specifically designed as a “top down plan”. It was conceived at the outset as a Plan to maximise revenue for the Local Authority. This poses a major problem for the people of Formby. Formby has a number of virtually unique environmental constraints both in terms of Sefton and the wider UK which means a “top down plan” was never going to be an appropriate approach for achieving sustainable development.

Firstly, to the west of the town is the environmentally important dune system which is continually under threat of erosion both from the sea and “recreational tramping” (see Section 4.3 of Habitats Regulations Assessment of the Proposed Modifications to Sefton Local Plan May 2016). A fact which is not properly understood by Sefton is that the Dune System is Formby’s main flood defence. It is estimated that 10 years erosion occurred in one night in 2017. The pumping station on the Alt is designed to protect those areas inland that are not protected by the Sand Dunes.

Secondly to the North of the town is the Freshfield Dune Heath and Wham Dyke which is one of the most important wildlife reserves in the country. A site which I might add has been put at risk by the Sefton Local Plan (see https://www.lancswt.org.uk/nature-reserves/freshfield-dune-heath).

Thirdly to the east of the town is Downholland Brook and the environmentally important Moss Land which acts as a major feeding ground for migratory birds and supports the RAMSAR site. This land is below sea level and without constant pumping it will flood, during periods of high rainfall in winter it floods. In south is the river Alt, Formby is effectively surrounded by water. On these grounds alone Formby should have had a plan with policies appropriate to its needs.

Studies for the Sefton Local Plan identified the fact that Formby had an ageing population and there was a problem of housing affordability. This problem has been exacerbated by past failures in planning policy. Firstly, a side effect of the Housing Market Improvement Policy undertaken in Bootle was that house building elsewhere in Sefton was suppressed. Secondly
Sefton’s planning department has allowed a disproportionate number of luxury housing developments to be built in Formby. Consider table A in the appendix. It clearly shows that planning decisions have resulted in a skewing in the type of houses being built in Formby, the percentage of detached houses in Formby (42.3%) is nearly twice the average England. This is because developers prefer to build luxury houses in Formby. During the Local plan hearing one developer argued that detached houses can be affordable. However, this is of course nonsense, in the latest development in Formby “affordable” houses were approximately £200,000 according to the Land Registry the average first time buyer in Sefton pays £129,000. Sefton’s policy HC1 will result in so called “affordable” house prices being set at levels way above what is needed to reduce the affordability problem.

Furthermore, under the Sefton Local Plan on new sites with more than 15 dwellings, for every 2 “affordable” houses 7 market houses will have to be built. Therefore, without a policy which specifies the type of housing we need i.e. Starter Homes, the houses being built will continue to skew the housing mix as shown by table A. On sites with viability problems i.e. flooding which is most of Formby, the likelihood is (based on past experience and evidence given at the Local Plan enquiry) that eventually the affordable housing quota will be varied downwards to around 4%, nowhere near Sefton’s 30% requirement.

However, it gets worse as table C shows because new housing is more expensive than existing property the likelihood is that Sefton’s housing policy given the fact that more than a 1000 new houses will be built on what was Formby’s greenbelt will increase the average price of property in Formby making houses more unaffordable not less! Moreover, any housing policy relating to Formby needs to tackle the ageing population problem as identified by the Parish Council’s own population study. This can only be tackled by providing appropriate housing and employment opportunities commensurate with Formby’s highly skilled workforce see tables D and E in order to combat outward migration.

This is why Neighbourhood Plan policy H4c seeks to encourage developers to build starter homes for young families. Policy WS1 seeks to provide employment opportunities appropriate for Formby’s workforce. A business Park is consistent with Sefton’s Local Plan and economic trends identified with Sefton’s own research. Unfortunately, Sefton’s Local Plan does not meet the employment needs of Formby’s young people given that their educational attainment is considerably higher than the rest of Sefton.

Neighbourhood plan policies H2 and H10 deal with housing density are included to bring the neighbourhood plan in line with recent changes to the NPPF. Sefton’s Local Plan is largely silent on these important issues. No mention is made of housing density and infrastructure these are strategic matters and are reserved for Sefton.

The Neighbourhood Plan’s policies ESD1 & ESD3 are to be welcomed given that Formby is now subject to the Merseyside Regional government ad Liverpool, St. Helens and the Wirral all have plans to build on their open spaces. Sefton’s own Open Space studies identified a shortage of such spaces on the eastern side of Formby. This is particularly important in terms of pressure on the coastal dune system (see above and policy ESD6). It is not clear how committed Sefton are to maintain our Open spaces. During the Local Plan hearing the inspector commented on the fact that without any planning justification being given changes were made to Open Space policies.
These policies compliment the Sefton Local Plan and are in no way in contradiction with its strategic aims.

Formby’s environmental constraints have come into sharp focus given that Sefton’s Local Plan promotes more housing than is actually needed (see the SHELMA report) and as a matter of policy is disproportionately allocated to Formby and Maghull (See Inspector Pike’s comments). Therefore, given the disproportionate housing allocation and environmental constraints it is entirely reasonable for Formby to have a Neighbourhood plan and policies tailored to Formby’s needs.

The Sefton Local Plan has placed Formby’s infrastructure under considerable strain (Drainage, Schools, Roads and Medical services).

Flooding is already a major issue in Formby with many residents already at risk from flooding (see table F). This is likely to get worse with the effects of new building and climate change. In fact, not only are many existing residents struggling to get insurance and properties on the newest housing site have already been flooded. A major problem is Formby’s Surface Water Management System. This is not the responsibility of the Environment Agency although in order to protect their interests they manage some parts of it along with United Utilities. It is Sefton Council who are nominally responsible as the lead flood authority. RSK produced an FRA for one of the developers which declared Formby’s “Surface system to be not fit for purpose” and bound to flood (see pages 8 – 10 of the Amended flood mitigation Strategy for Brackenway).

It is for these reasons and the fact that Sefton and United Utilities have been in long-term denial about these problems that residents feel that any Neighbourhood Plan must have robust flood policies There is nothing in the Local Plan (Policy E8) that deals with the existing surface Water flooding problem and its exacerbation through further development and as such Formby residents are largely dependent upon the goodwill and common sense of the developers.

The Parish Council are strongly in favour of protecting Formby’s trees. The Formby area has lower than the average amount of tree cover. It is felt that encouraging tree planting will mitigate flooding, improve air quality and promote wildlife hence Neighbourhood Plan Policy ESD7. Sefton are on record in saying there is no budget to replace trees destroyed by the developers and are needlessly cutting down many trees in the area including trees in the village centre.

Policy ESD6 is designed to help mitigate “recreational tramping” as identified by the revised HRA May 2016 it seeks to emphasise already in EQ9 as this is virtually a problem exclusive to Formby (currently with the exception of one site in Ainsdale). This will be increasingly important with the NT and the Sefton Coastal Plan seeking to promote visitor numbers. As yet Sefton have no solution to this problem and the attendant traffic and parking problems resulting from peak time visitors to the coast. Sefton’s response so far has been to offload responsibility to the NT.

The Parish Council’s own research has shown that Formby & Little Altcar has a higher car use than the national average. Many residents have multiple number of cars. East/west public transport links are non-existent. There are many roads in Formby that are impassable at peak times because of traffic congestion and on road parking. Given these facts it is
entirely reasonable to insist on new two bedroom plus developments having adequate parking facilities for at least two cars therefore, policy H8 entirely makes sense given Formby’s traffic problems. There is a real danger that the Sefton Local Plan will bring traffic to a halt in the town. Research for the Neighbourhood Plans showed that children are already cycling less as a result of road safety fears.

Sefton’s top down approach to planning has made no attempt to address Formby’s need for sustainable development and is essentially a revenue raising process. This means that it doesn’t provide the necessary mitigation for the disproportionate housing allocation. Sustainable development requires that resources should mitigate those areas most at risk from development. **However, Sefton have refused to introduce a Community Infra-Structure Levy consequently Formby has lost out on many thousands of pounds. However, more importantly it has made a strategic approach to dealing with Formby’s drainage and transport problems impossible.**

Secondly Sefton’s planning department has admitted as a matter of public record that they have neither the resources nor political will to enforce the policies in the Local Plan. This means that Formby’s residents have become 2nd class citizens where only the wealthy and large corporations can challenge planning decisions. This makes it impossible to protect the environment against inappropriate development particularly as MEAS and the planning department can receive funds from the developers in lieu of proper mitigation. The Neighbourhood Plan and its policies provides Formby residents with much needed transparency in what has become an opaque and one-sided planning process. Once the development process begins the value of the Neighbourhood Plan and its policies will become self-evident. Therefore, Sefton’s planning departments opposition to the Neighbourhood Plan is depressing and entirely predictable.

Yours faithfully
Appendix

Housing

Table A

<table>
<thead>
<tr>
<th>Figure 3.3: Dwelling types (2011)</th>
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</thead>
<tbody>
<tr>
<td>Source: 2011 Census</td>
</tr>
</tbody>
</table>

Table B

<table>
<thead>
<tr>
<th>Figure 3.5: Dwellings by Council Tax Band (2011)</th>
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</thead>
<tbody>
<tr>
<td>Source: ONS</td>
</tr>
</tbody>
</table>

Table C below shows how new housing costs more than existing property.
Source: Land Registry UK Gov

Workforce

Table D
Table E

Figure 4.11: Occupational Profile (2011)

Source: 2011 Census

Flooding
Table F

<table>
<thead>
<tr>
<th>Flood Event</th>
<th>Frequency</th>
<th>No of Homes and Businesses</th>
<th>% at Risk</th>
<th>Sefton Average</th>
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<tbody>
<tr>
<td>1 in 100</td>
<td>1%</td>
<td>3,287</td>
<td>34%</td>
<td>32%</td>
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<tr>
<td>1 in 30</td>
<td>3.33%</td>
<td>420</td>
<td>4%</td>
<td>2%</td>
</tr>
</tbody>
</table>

Source: SURFACE WATER MANAGEMENT PLAN
Final Report SMBC Aug 2011 Table C-6: Critical Drainage Area analysis