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

Re: Formby & Little Altcar Neighbourhood Plan

Dear Sir/Madam

I fully support the Neighbourhood Plan especially the attached policies. The Sefton Local Plan makes absolutely no allowance for Formby’s delicate eco-system (i.e. the coastal sand dunes and the Dune Heath and the many rare plants, insects and animals) The policies contained in the Local Plan do not sufficiently address the problem of coastal erosion arising from visitors and the effect of building over a 1000 houses on Formby’s greenbelt. This doesn’t take into account windfall development which has been substantial.

The Sefton Local plan seeks to build over 1,000 houses on greenbelt land which regularly floods. Formby suffers from a high-water table, fluvial and surface water flooding. The developers’ own flood risk assessments show that Formby’s surface water system is not fit for purpose. Unfortunately, the Sefton Local Plan does not adequately protect Formby residents against the Surface Water flooding problem. Local Plan policy EQ(8) makes very little reference to Surface Water flooding. Developers in their FRA’s continually use the Environment Agency to justify their flood policies but the Environment Agency has no responsibility for Surface Water Flooding and doesn’t allow for this type of flooding in their modelling. It is for these reasons we need a Neighbourhood Plan with strong flood policies.

In Formby we need a Plan with housing policies that promote affordable housing. Sefton’s approach will not work. Sefton has chosen to build on greenbelt land much of which has access and flood problems. This means that because of the need for mitigation and the resulting “viability” problems even the price of so called “affordable housing” is likely to be outside the means of many people in Sefton. It is our experience that developers try to reduce the affordability quota by offering money instead of building the houses we need. Sefton makes this possible see Section 9 of policy HC1 in the Local Plan.

The problem Formby has is that Sefton have actively promoted the construction of too many executive homes in Formby and with a housing policy which requires 7 market price houses for every 2 “affordable homes” this will only get worse under the Sefton Local Plan. The Neighbourhood Plan through policy H5 seeks not only to encourage developers to build the required quota as per HC1 but also encourages the government’s policy on starter homes this is consistent with HC1(section 10). If the developers do not build “affordable homes in the quantity specified by HC1 then there is no justification for building on Formby’s greenbelt.
Furthermore, Neighbourhood Plan policies H8 and GA3 are entirely justified as already there is a major problem of parked cars blocking roads causing congestion. The Sefton Local Plan makes no attempt to deal with the traffic congestion problem which is almost certainly going to occur once all of these new houses are developed.

Policy GA3 is especially important as cyclists, children and people with prams are finding Formby’s increasingly congested roads difficult to negotiate. Sefton seem to think there is no problem with traffic congestion in Sefton but the Local Plan is likely to make this worse.

The Neighbourhood Plan’s commitment to protecting our open spaces is to be welcomed. Already Sefton have sold off playing fields and demolished a relatively new Sports Hall at nearby Ainsdale. Neighbouring Authorities have already announced plans to build on their open spaces. Open spaces are essential to protecting the coastline as outlined by Sefton Policy EQ(9).

The Neighbourhood Plan’s environmental policies ESD3, 4 and 5 are to be welcomed and are way ahead of those in the Sefton Local Plan which are already out of date. The policy on trees ESD7 is to be welcomed as Sefton are not enforcing their own SPD and have categorically refused to budget for this SPD. There absolutely no point in having a Local plan if you don’t enforce it or conspire with developers to undermine its objectives. We need to retain our trees in Formby and ultimately plant more in order to reduce the flood risk and combat the air pollution which will be generated in Formby by Sefton’s Local Plan.

Formby and Little Altcar’s Neighbourhood Plan does not contradict the strategic Aims of the Local Plan, but they complement them and adapt the plan for Formby’s special requirements. Sefton seem to be more interested in raising money and wriggling out of their obligations rather than achieving sustainable development as understood by the NPPF.

Yours Faithfully,