Planning Team

West Lancashire Borough Council

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Dear Local Plan Team,

I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester concerning **West Lancashire’s Local Plan 2023-2040 Scope, Issues & Options consultation**.

Please find an introduction to CPRE with links to recent research that I hope will be of use.

**CPRE**

CPRE, the countryside charity, campaigns for a thriving, beautiful countryside, and greenspace for everyone, which unfortunately, are under threat – from pollution, litter, irresponsible development, and a host of other pressures.

You might remember us as ‘The Campaign to Protect Rural England’ and for nearly 90 years we have brought about countryside protection and we are proud of our achievements including the establishment of National Parks, Areas of Outstanding Natural Beauty, Green Belt, Hedgerow Regulations, Quiet Lanes amongst other important planning policy tools.

At our heart we are advocates of a local development plan-led system, accepting the importance of democratic planning decisions and environmental goals.

We help CPRE members and the public to better engage with planning matters and throughout 2021, with an increased understanding from the pandemic of just how vital access to greenspace is for our health and well-being we continued to have success.

Our focus has been:

* nature and landscapes;
* better places to live;
* farming;
* sustainable transport; and,
* climate and energy.

**Campaigns**

Our award winning public affairs campaign, convinced the Government to scrap its ill-advised planning white paper reform, which threatened democracy, nature, and provision of [much needed rural affordable housing](https://www.cpre.org.uk/what-we-care-about/better-places-to-live/homes-people-can-afford/), among other harms.

That is not to say we are content with the planning system, as the National Planning Policy Framework (NPPF) is causing the loss of countryside for development that is not justified. This is due to the mandatory use out of date high growth ONS 2014 data, inflates job and housing targets resulting in councils being [Set up to Fail](https://www.cpre.org.uk/resources/set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside/) with the result of an acceleration in ‘off’ local plan countryside loss, when councils inevitably fail the stringent Housing Delivery Test. This leads to the development of greenfields, including Green Belt, in advance of brownfield, despite claims to the contrary.

Furthermore, it has an unsustainable road focus that has caused [rural transport deserts](https://www.cpre.org.uk/about-us/cpre-media/2020-transport-deserts/) and the most unpopular and costly to the public sector ‘planning by appeal’. The NPPF widely recognised as a ‘developers’ charter’ and CPRE will continue to campaign for planning policy changes to stop widespread degradation of our environment and the health problems and harm to biodiversity that result.

Consequently, we are lobbying Michael Gove in the ‘Levelling Up Reform’ to make the system more sustainable, based on integrated sustainable transport and local decisions. The NPPF must no longer trail so woefully behind public opinion on the value of the environment. Finally, CPRE objects to any attempt by ministers to throw out legal rulings that they do not like. This manipulation of the law to suit developer interests is not in the wider public interest.

**Brownfield first**

CPRE’s [Recycling our land: The state of brownfield report, 2021](https://www.cpre.org.uk/resources/recycling-our-land-the-state-of-brownfield-report-2021/), evidences there is a lot of available brownfield land in all regions, yet between 2006 and 2017, the proportion of brownfield land used for housing decreased by 38%. Over the same period the use of greenfield land has increased by 148%. The situation is worse for the North West due to its role in the industrial revolution, and especially in more urban areas neighbouring West Lancashire, which is predominately rural and of value to agriculture and biodiversity. As part of The Duty to Cooperate West Lancashire should only plan for what is really needed as not to undermine the brownfield regeneration that is necessary in neighbouring areas to overcome industrial decline.

CPRE produced a [brownfield land register toolkit](https://www.cpre.org.uk/resources/brownfield-land-register-toolkit/) with local community input to enable people identify more wasted brownfield sites for reuse, and we ask if you could please signpost people, perhaps have a link to it on your website’s Brownfield Register page.

**Neighbourhood Planning**

We also advocate more [neighbourhood planning](http://www.cpre.org.uk/resources/how-to-shape-where-you-live-a-guide-to-neighbourhood-planning/) take up, as we think the additional layer of policy can help protect local distinctiveness and help conserve rural characteristics and we are aware of a variable take up across Lancashire, Liverpool City Region and Greater Manchester. The environment is suffering as a result of this low take up in West Lancashire.

**Planning tools**

We encourage West Lancashire Council to take advantage of what control it has at its disposal to maximise opportunities to benefit the environment. This is vital through the local plan process. Developers should be encouraged to better design schemes, maximising clean energy and insulation ([Building for a Healthy Life](https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf)) with no loss of our natural assets including biodiversity, tranquility, high grade farmland, mature woodland, trees and hedgerows. Mitigation and compensation must be adequate and enforceable. Developments that do not support climate and biodiversity goals should be refused.

**Pandemic**

During Covid people have increasingly valued their local greenspace for recreation and the health and well-being benefits. The way people live has changed with less property needed for commercial use as people increasingly work from home, retail increasingly online, and more premises being repurposed in our towns and cities. We must revisit assumptions about land for employment and housing.

**Summary**

It is with all the above in mind that I offer in **Appendix 1.0** CPRE’s comments.

We hope that a truly sustainable local plan, representative of local concerns, will be adopted without unnecessary delay as without one in place our rural and urban greenspace, including designated Green Belt, is most vulnerable to speculative development, which is the least sustainable and most harmful form of development.

I hope this information is of help. Please contact me without hesitation if you require further information.

Yours sincerely

**Jackie Copley MA, BA, (Hons), PgCert, MRTPI**

Planning Manager

**Appendix 1.0: CPRE response to Issues and Option Consultation**

**What is special about West Lancashire?**

CPRE considers that West Lancashire is one of the most important rural areas of Lancashire. Not only does it provide jobs in agriculture and other rural sectors, but the Countryside has intrinsic value for its tranquillity, landscapes, dark night skies, woodland, trees, hedgerows, ecology, agricultural cultural and historical associations, public rights of way. It is valued and visited by residents and people from neighbouring conurbations for recreation and leisure.

West Lancashire is a high value area for natural capital due to the high grade of soils (including Best and Most Versatile Grade 1-3a), its wide-ranging biodiversity linked to the meres and mosslands, with Martin Mere and the Ribble Estuary where priority and red list species can be found. These are recognised as internationally important wetland habitats, particularly important as a winter-feeding ground for migratory wetland birds, including pink footed geese. There are also six Sites of Special Scientific Interest (SSSIs) and a number of local nature reserves.

West Lancashire has unique landscape character arising from its geology and history. The River Douglas located in the east, and the Leeds-Liverpool Canal which bisects the Borough and also branches off to the north at Rufford.

The area has a flat topography and large areas within the Northern Parishes (and to a lesser degree the Western Parishes) are at risk from potential flooding.

**What should the scope of the Local Plan 2023-2040?**

The plan should have strategic policies and allocations that enable the area’s needs to be met in a sustainable way, reducing greenhouse gas emissions, reversing years of environmental degradation, and affording future generations with high grade farmland, enhanced biodiversity and conserving the rural character of the area.

The rural economy should also be fully valued and championed to increase the quality of the life of residents, businesses and to support the visitor economy to attract inward investment in a way that enhances the natural and built environment.

**Strategic Policies:**

CPRE broadly agrees with those recommended, however suggests making the climate the highest priority as it is due to its effects of flooding to most of West Lancashire. It also highlights that the Council declared a climate emergency on July 17, 2019. We welcome this and trust that the Council will use the new local plan as a genuine opportunity to progress the issue. The new local plan policies and allocations should ensure a reduced carbon footprint. Building out greenfield land in rural areas is in the opposite direction of what we collectively need to be achieving.

We recommend that the Climate Change Committee’s [Guidance for Local Authorities](https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/) on its 6th Carbon Budget, and the RTPI and TCPA [A guide for local authorities on planning for climate change](https://www.rtpi.org.uk/climatecrisis) can help show the necessary pathway for the Council to follow.

* Climate emergency (replace for climate change to emphasise urgency) and securing environmental gain (to reflect Environment Act 2021)
* Delivering sustainable development – urban focus and a 'settlement hierarchy' no need to duplicate reference to the 'presumption in favour of sustainable development' from NPPF. CPRE hopes the planning reform will make the NPPF more balanced and as a result more sustainable. At the moment the NPPF does not deliver sustainable development.
* Housing need (not requirement), employment land requirements, distribution of development around West Lancashire
* Settlement boundaries, Protected Land and Green Belt
* Strategic sites

**Housing and Communities Policies**

The housing policies should limit the amount of housing to what is needed as opposed to what developer’s demand as their profit motive does not result in sustainable development.

* Strategic housing locations
* Efficient use of land – with a locally derived brownfield target to ensure a preference versus 'greenfield' development. Please refer to our comments on brownfield land in the covering letter and link to the national level brownfield research showing now brownfield is a resource that is not finite;
* Appropriate housing densities
* Dwelling sizes to reflect needs of the aging community
* ‘Genuinely’ Affordable housing – add genuinely (First Homes, which are not in perpetuity affordable dwellings)
* Quality housing for older people – emphasis on quality of life to give older people real reason to downsize from family housing
* Custom and self-build housing
* Accommodation for students
* Accommodation for caravan and houseboat dwellers
* Accommodation for Gypsies, Travellers and Travelling Showpeople
* Temporary agricultural workers' dwellings
* Principles of 'place-making' – ensure the rural character of West Lancashire’s rural settlements is respected and ensure adequate green space and green infrastructure.
* Preserving the Borough's heritage
* Community Facilities

**Economy and Employment Policies**

The value of West Lancashire’s rural economy should be championed by the local plan.

* Employment areas
* Employment site allocations
* The rural economy (policy control of sheds in Green Belt and other open landscapes)
* Town centres
* Education: Edge Hill University, skills and training

**Environment and Health Policies**

We are amid a biodiversity emergency, and the Natural Capital Committee has evidenced widespread degradation across all natural capital asset types. In West Lancashire there has been a loss and reduction of a wide range of biodiversity including mammals (including bats), birds, insects, amphibians, and the local plan should seek to reverse this trend by ensuring land is used as responsibly as possible. Mistakes and errors in the past should be acknowledged and corrected in the new local plan.

CPRE is therefore opposed to loss of designated Green Belt, and other wildfowl lowland farmland. We recommend proposed allocations are not functionally linked to Martin Mere SPA, Ribble & Alt Estuaries SPA, or the Mersey Estuary SPA.

The new Environment Act 2021 needs properly considered in light of the high value baseline across West Lancashire. To achieve 10% biodiversity net gain any mitigation and compensation is likely to be required on site or in proximity and should be discouraged off-site if appropriate. We echo the comments of Lancashire Wildlife Trust and other local environmental groups.

CPRE sits on the Local Nature Partnership that seeks natural solutions to the climate and biodiversity crises progressing the Local Nature Recovery Strategy and learning more about achieving biodiversity net gain. Green Infrastructure must be retained wherever possible, particularly mature woodland, trees and hedgerows.

In 2021, we published the [Hedge Fund Report](https://www.cpre.org.uk/resources/hedge-fund-full-report/), which shows one of the best ways to simultaneously tackle the climate crisis, boost nature and grow our economy is by restoring and increasing the UK’s hedgerow network. Shockingly, we have lost 50% of our hedgerows since the Second World War and they are still in decline. We will progress our work on hedgerows with local groups in 2022. We hope the new local plan will continue to protect and conserve existing hedgerow and promote new planting in new development to ensure an improved environment.

* Preserving and enhancing the Borough's nature
* Landscape and land resources – CPRE hopes this topic includes peat and high-grade soils. The policy should specify no development of peat as set out in Lancashire’s Mineral and Waste Plan and conservation of high-grade farmland.
* Flood risk and water resources
* Contamination and pollution
* Air quality
* Green infrastructure, open space, trees, woodlands and hedgerows:
* Healthy eating and drinking

**Transport and Infrastructure Policies**

Recognition of the poor performance of West Lancashire on greenhouse gas emissions from transport should be a key issue for the local plan. Every effort to reduce car dependency should be taken with strict focus of new development at existing urban settlements to drive down demand. Investment in public transport must result or the local plan will fail to deliver on sustainable development and climate emergency declaration goals.

* Transport networks and access. CPRE believes there should be focus on public transport to move the population away from the current levels of car dependency.
* Parking standards and electric vehicle charging points
* Digital connectivity
* Low carbon and renewable energy. CPRE recommends for the avoidance of doubt the local plan should specify that shale gas exploration is incompatible with climate emergency goals and will not be consented.
* Energy efficiency in new developments
* Water efficiency in new residential developments

**Other Policies**

* Sequential tests – where they are required and how to do them
* Viability of development – what the Council will expect (and no reneging out) of developer contributions in line with NPPF paragraph 58 .
* Developer contributions – adequate to cover all environmental

**Background and Evidence**

CPRE agrees with most of the information identified. The New Town of Skelmersdale with Up Holland needs revitalisation, and any previously developed land (brownfield) ought to be reused for the delivery of new development in advance of the loss of greenfield land.

Ormskirk with Aughton with the market town function and Edge Hill University and Burscough, which has been the focus of more recent development and needs more supporting infrastructure to tackle associated road congestion and flood risks.

West Lancashire’s rural settlements each have their own distinct characteristics that should be enhanced in the future. Adoption of neighbourhood plans would be a way to support local character and decision taking in the future.

Many of the villages have become transport deserts, as the CPRE report evidences, leading to rural isolation and social exclusion. The rural local road network is completely unsuitable for HGV traffic and despite local communities raising the problem the Highways Authority seems unable to enforce speed limits and weight restrictions. Increasing the rural settlements suffer from flooding and this is set to worsen with impacts of the climate emergency.

Northern parishes, such as Rufford, have nature reserves that need to be enhanced in the future. They are threatened with flooding and traditional farm businesses increasingly seek industrial type sheds for operations that harm Green Belt purpose and the five functions. Flood risk is a genuine problem.

Eastern and Southern parishes are isolated due to lack of public transport and are threatened by flooding. The lack of ‘genuinely’ affordable housing is a problem, particularly in older age groups.

Western parishes also suffer from isolation. There are peat deposits that must be conserved to properly provide carbon sequestration benefits. The Alt Crossens pumping arrangement is to be changed and there is concern over the flooding of high-grade farmland, due to harm to business viability.

The rural economy must be protected from harmful planning decisions. Farmland of high quality should be protected so future generations can grow its own food. Environmental designations and land that supports important ecology should be conserved and enhanced by the local plan.

**Social And Demographic Matters – Identify real housing need**

The new local plan must not saddle itself with an excessive requirement, due to the problems CPRE evidences in its ‘Set Up to Fail’ report (see hyperlink above). The Government has a clear mandate to focus on towns and cities and the Standard Method (2020, with cities and urban centres uplift) identified a Housing Requirement for West Lancashire of 193 dwellings per annum (dpa), whereas the adopted local plan sets a target of 324 dpa.

The Department for Levelling Up, Housing and Communities (DLUHC) published the 2021 Housing Delivery Test (HDT) measurement by local planning authority on the 14th of January 2022. Over the past 3 years 1,394 homes were completed when only 513 homes were identified as required in updated requirement figures, so delivery has out-performed by 272%.

The new local plan should cater for local housing need and avoid an inflated requirement. It ought not to compete unjustly with surrounding urban authorities that have brownfield land in need of reuse.

In rural areas like West Lancashire, genuinely affordable housing is needed at a size and tenure to meet local needs, and not larger family and executive homes for maximum developer profit, which leads to more people commuting long distances into Liverpool, Greater Manchester and beyond. Increasing car dependency in West Lancashire is inappropriate. This is not sustainable. The reduction in revenue to local authorities from Government has led to a shrinkage in bus services across Lancashire. Rural bus services have been disproportionately affected and now many villages are transport deserts (see link to CPRE research above).

**Safeguarded Land Policy**

In the current adopted plan Policy GN2a sets out Safeguarded ‘Plan B’ Sites, on pages 62 and 63.

Linked to this policy is also Policy RS6 concerning A "Plan B" for Housing Delivery in the Local Plan, on page 110. I consider that there are material considerations that require the sites that remain undeveloped to be assessed for protection by Green Belt redesignation. This is particularly the case with Land off Parrs Lane, Aughton L39.

The land maintains openness and should do so permanently and provide the five functions of Green Belt as set out in National Planning Policy Framework, paragraph 38:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is my opinion that the sites perform a mix of the five functions to a sufficient extent as to be considered for Green Belt redesignation.

**Highest grade farmland**

A key issue is that Safeguarded land is of very high grade (Best and Most Versatile Grade 1) agricultural quality and it should be considered as a national asset and protected as a land asset of value for future generations, so they are able to grow food and for food security reasons.

*Appeal Decision APP/P2365/W/15/3132596 Land off Parrs Lane, Aughton L39*

Mr Clive Sproule BSc MSc MSc MRTPI MIEnvSc CEnv dismissed an appeal by Redrow homes to develop 250 homes on Land off Parrs Lane, Aughton L39 following an inquiry that was held in May 2016. I draw your attention to the Appeal Decision Notice, which sets out some important planning background and five substantive reasons for refusal:

* + Housing Policy, in paragraphs 7 -76
  + Best and Most Versatile Land, in paragraphs 77 -81
  + Sustainable development,t in paragraphs 82 - 109

These issues remain, and in my opinion underpin the case against use for housing or other development in the future. In fact the weight that could be attributed against development has increased since 2016, and therefore the land should be returned to Green Belt. The public benefit in redesignation to Green Belt outweighs the likely costs of retaining the land as a safeguarded site for housing. The site as well as not being appropriate for development is not needed. There are other allocated sites to be considered for deletion from the local plan.