ANNEX: Questions to Burscough Parish Council

Below are the responses (in blue) from Burscough Parish Council to the Examiner’s initial questions as set out in the Annex to his letter dated 7 March 2019. The Parish Council would be pleased to provide further information should the Examiner require any further clarification in relation to these or other matters.

1. Is the Plan aligned with the emerging West Lancashire Local Plan Review, particularly in its references safeguarded land at Yew Tree Farm?

No. The Burscough Parish Neighbourhood Plan is aligned to the development plan in force for the area which is the West Lancashire Local Plan 2012-2027 adopted in October 2013. The Burscough Parish Neighbourhood Plan recognises the Yew Tree Farm Strategic Development Site, both in terms of the allocation for housing and employment and the safeguarded land under policy SP3 of the adopted West Lancashire Local Plan. The Strategic Development Site, including the safeguarded land is shown on the Key Diagram to the Burscough Parish Neighbourhood Plan and it is referenced as a strategic policy of the adopted plan in Section 2 of the Burscough Parish Neighbourhood Plan.

The Planning Practice Guidance is clear that Neighbourhood Plans can proceed ahead of the preparation of a Local Plan Review. PPG Paragraph 009 Reference ID: 41-009-20160211 states ‘Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its Local Plan. A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition’.

The emerging West Lancashire Local Plan Review is still in its early stages. West Lancashire Council consulted on a Preferred Options at the end of 2018. At a meeting of West Lancashire Council’s Cabinet on 12 March 2019 it resolved in relation to a report entitled ‘Local Plan Review Preferred Options – Initial Feedback on Public Consultation’, ‘that the Local Delivery Scheme be amended to allow time for the reconsideration of the proposed Local Plan timescale and for the preparation of and consultation on a new Local Plan Preferred Options’. This suggests there is considerable uncertainty regarding both the content and timescale of the Local Plan Review. As such according to national policy and guidance it carries little weight and its policies are not those to which the policies within the Burscough Parish Neighbourhood Plan should be tested.

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1 https://democracy.westlancs.gov.uk/ieListDocuments.aspx?CId=143&MId=1828&Ver=4
2 https://democracy.westlancs.gov.uk/documents/g1828/Printed%20minutes%2012th-Mar-2019%2000%20Cabinet.pdf?T=1
2. In their consultation responses West Lancashire District Council, Lancashire County Council (the Lead Local Flood Authority), the Environment Agency, the Canal and River Trust and United Utilities have variously made comment on some or all of the following:

- Section 3 of the Plan;
- Policies BPl1, BPl2, BPl3 and their supporting text.

Would the Parish Council please respond to these comments? If the Parish Council accepts that the Plan should be modified in response to any or all of these comments would it please let me have the wording of the modifications which it considers to be acceptable?

**West Lancashire Borough Council**

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<th>Comment</th>
<th>Response</th>
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| **BPI1: Development and Infrastructure**
Second paragraph – add "highway safety or" to second sentence so that it reads "……this will not have an unacceptable adverse impact on highway safety or the amenity of residents and occupiers....."
Reason – highway safety is more likely to be the prime consideration. | BPC agree to proposed modification. The second paragraph could read (additional text in red) ‘The required infrastructure should be provided at the appropriate time during the construction of the development. It should normally be provided prior to the development becoming fully operational or occupied unless it is demonstrated that its provision after this will not have an unacceptable adverse impact on highway safety or the amenity of residents and occupiers within and adjacent to the development. Larger developments may need to be phased to ensure this requirement can be met’. |
| Final paragraph – after "will be supported" add "subject to accordance with other policies." Reason – WLBC acknowledge the Parish Council’s concerns in relation to local infrastructure provision, however the additional wording would give clarity that wider matters also need to be taken into consideration. | BPC consider this is unnecessary as proposals will have to, in order to be supported, be in accordance with the plan as a whole. |
| Paragraph 6.1.12 – this needs to be redrafted. WLBC previously expressed concerns that the criteria in relation to the IDS are unduly onerous upon an applicant and impractical and those concerns remain. In this regard, criterion iii) potentially refers to information that is outside the scope of an applicant to be able to obtain and criterion iv) would not be achievable in all instances, for example in relation to wastewater infrastructure. The preceding "where practical" to the criteria would not be a sufficient qualification to ensure that they would be interpreted and applied consistently and could give rise to different interpretation between the local planning authority, the | In response to the comments BPC considers that the following amendments could resolve the concerns.

Amend (additional text in red) criterion (iii) to read ‘iii. A review of any planned and proposed infrastructure improvement works related to the application site by the relevant providers or other parties.

BPC consider that criterion (iv) is consistent with the requirements that are set out in Policy IF3 ‘Service Accessibility and Infrastructure Growth’ parts 1 and 2 of West Lancashire Local Plan. This policy seeks to ensure that development is |
Parish Council and an applicant. 
Reason – as above. 
required to provide essential site services and 
communications infrastructure; mitigates any 
negative impacts on existing infrastructure as a 
result of new development, and, where 
appropriate, contribute towards improvements to 
extisting infrastructure and provision of new 
infrastructure as required to meet the needs of 
the development. 
The last sentence to paragraph 6.1.12 which 
precedes the criteria does not include the words 
‘where practical’. It states ‘where appropriate’ 
which is considered to be consistent with the 
wording in policy IF3.

### BPI2: Surface Water Drainage

First paragraph – amend to include the highway 
authority as the approach to surface water 
drainage should also be considered in liaison 
with them in relation to utilising highway 
drains. 
Reason – as above

In response to the comments BPC considers that 
the first paragraph could be amended (additional 
text in red) as follows: ‘The approach to surface 
water drainage should be considered in liaison 
with the Lead Local Flood Authority, the Local 
Planning Authority, the Local Highway Authority, 
the public sewerage undertaker and where 
appropriate the Environment Agency’.

Third paragraph – after DEFRA insert "and West 
Lancashire Local Plan Policy GN3 and associated 
WLBC guidance notes." 
Reason- It is not always possible to provide 
clear evidence of existing positive connections 
from previously developed land. If this is the 
case WLBC provide a developer with alternative 
approaches as detailed in WLBC guidance notes 
relating to Drainage, Flood Risk and 
Sustainability available via the webpage: 
https://www.westlancs.gov.uk/planning/planning-
applications-enforcement/applying-for-planning-
permission/theplanning-application-process/registration-and-validation.aspx

In response to the comments BPC considers that 
the paragraph could be amended as follows (new 
text in red); ‘On previously developed land, 
applicants should target a reduction of surface 
water discharge in accordance with the non-
statutory technical standards for sustainable 
drainage produced by DEFRA and, where 
appropriate, West Lancashire Local Plan Policy 
GN3 and associated WLBC guidance notes. 
Add after paragraph 6.1.19 in the Reasoned 
Justification the following ‘It is not always possible 
to provide clear evidence of existing positive 
connections from previously developed land. If 
this is the case WLBC can provide a developer 
with alternative approaches as detailed in WLBC 
guidance notes relating to Drainage, Flood Risk 
and Sustainability available via: 
https://www.westlancs.gov.uk/planning/planning-
applications-enforcement/applying-for-planning-
permission/theplanning-application-process/registration-and-validation.aspx

Reasoned Justification paragraph 6.1.19 – 
remove "including the adoption of SuDS" in the 
third bullet and replace with "including SuDS 
Management Plans". 
Reason – WLBC are not aware of any 
organisation that will routinely adopt SuDS.

In response to the comments BPC considers that 
the bullet point could be amended (additional text 
in red) as follows: ‘Incorporate maintenance and 
management arrangements within including SuDS 
Management Plans including, where possible, the 
adoption of the SuDs and a programme and 
delivery of the SuDs in relation to the planning of
**BPI3: Foul Water Drainage**

**Reasoned Justification paragraph 6.1.20** - there is now an IDP Update Stage 2 October 2018. Importantly, this paragraph is no longer an accurate reflection of the current situation because there are no capacity issues at New Lane Wastewater Treatment Works. Refer to the representation by United Utilities on this matter for amended text for this paragraph. Reason – factual accuracy.

This paragraph is suggested to be amended as a result of comments from United Utilities and the LLFA. Please see responses to these stakeholders below.

**Reasoned Justification paragraph 6.1.21** – amend first sentence to replace "necessary" with "possible". Reason – betterment is not allowed.

BPC agree to the proposed modification.

Amend second sentence to read "Reference should be made to BFG's flooding database and other relevant data when considering capacity before connections are made to the existing foul / surface water drainage systems." Reason – a wider range of data sources should be referred to of which the EA's flood maps would not be the primary source in this instance.

BPC agree to the proposed modification.

**Section 3**

**Comment**

Paragraph 3.56 - amend the 3rd and 4th sentences so that they read "However, should the Lead Local Flood Authority (Lancashire County Council) advise that Burscough (or part of) would benefit from a CDA designation for other reasons (such as surface water capacity issues), the local planning authority (West Lancashire Borough Council) may choose to designate a CDA. As such, the County Council will investigate surface water flood risks in Burscough and advise the Borough Council accordingly."

Reason - WLBC do not have a duty to investigate flooding to inform the Strategic Flood Risk Assessment. To investigate suggests that on-site inspections, dye testing and CCTV work are expected. This cannot sensibly be done at a strategic level due to resource and funding implications. A desk study is the appropriate method.

Please see suggested modification to this policy in the response to Lancashire County Council as LLFA below.

Paragraph 3.57 – amend final sentence to read "The BFG are supporting the Lead Local Flood Authority and West Lancashire Borough Council as they investigate surface water flood risks in..."
**Burscough.**  
**Reason – factual accuracy**  

Paragraph 3.61 - suggests that BFG are encouraging the public to use the BFG as the sole point of contact when reporting flooding. Amend the paragraph to reflect that the BFG should be encouraging the public to contact United Utilities in the first instance to undertake investigations into a flooding event as soon as possible.  

Reason – United Utilities is best equipped of all the Risk Management Authorities, the operatives are well versed in flood investigation and response times are subject to scrutiny by OFWAT. It also employs a systematic evidence gathering process.

In response to the comments BPC considers the paragraph could be amended (new text in red) as follows; ‘The Parish Council, through BFG will seek to work with LLFA on developing a Flood Risk Management Strategy for the Parish. As BFG have developed locally as a point of contact for providing details on flooding issues and for collecting all types of flooding incidents details and maintaining a register of flooding events, BFG will pass this information to the relevant authorities to ensure the appropriate organisations are informed to ensure their documents and policies contain the relevant flooding information. The BFG will also encourage residents and other property owners to contact the relevant authorities of flooding incidents. It is an objective of BPNP to reduce flooding across Burscough through ensuring that all key stakeholders, the Flood Risk Management Authorities, work with BPC through the BFG’.

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**Lancashire County Council (the LLFA)**

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<th>Section 3</th>
<th>Response</th>
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<td><strong>Comment</strong></td>
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<td>3.56 For clarification, the LLFA would like to point out that the Environment Agency is not responsible for designating Critical Drainage Areas (CDA). CDA's can be designated by a local authority for their own development management purposes. They do not trigger a statutory consultation with the EA. The EA have no responsibility for identifying these areas. This could relate to areas that have a high risk of localised flooding from, for example, watercourses, overland surface water flows, surcharging culverts or even the sewer network. Such a designation should be evidence based. An Area with Critical Drainage Problems (ACDP) is designated by the EA. The purpose of the designation would be to trigger a statutory consultation with the EA for development located in Flood Zone 1 which they would otherwise not be consulted on. A site specific FRA would be required. Neither of these designations would necessarily preclude future development. In addition, WLBC has been identified as having</td>
<td>BPC note that the Environment Agency did not make any comments in relation to this paragraph. According to Government guidance on flood risk assessments and critical drainage areas (<a href="https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zone-1-and-critical-drainage-areas">https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zone-1-and-critical-drainage-areas</a>) a site specific flood risk assessment for development (other than minor development) will be required if the site is in an area with critical drainage problems as notified by the Environment Agency and is in flood zone 1. Notwithstanding the comments from the LLFA this seems to suggest that CDAs are designated by the EA. In order to deal with the comments BPC would suggest the current paragraph be deleted and replaced with the following ‘A Critical Drainage Area (CDA) is an area within flood zone 1 that has critical drainage problems where surface water runoff causes flooding at locations within</td>
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<th>Duties to investigate surface water flood risks. The LLFA would like to clarify that WLBC would only have this responsibility if the flooding problem relates to assets owned by the Council. Otherwise, WLBC acts as a Risk Management Authority Partner (RMA) in flooding investigations. The LLFA is the authority responsible for investigating flooding incidents and will investigate, to the extent that it considers it necessary or appropriate, in accordance with the LCC Flooding Investigation Policy.</th>
<th>That area. The designation of a CDA would trigger a statutory consultation with the Environment Agency for development located in Flood Zone 1 which they would otherwise not be consulted on. A site-specific FRA would be required for all development other minor development. Currently there are no areas within the Parish designated as a CDA. However, with incidents of frequent surface water flooding in parts of the parish there may be evidence to support the possible designation of a CDA in the future.</th>
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<td>3.58 As stated above the LLFA is the authority responsible for investigating flooding incidents which meets LCC Flooding Investigation Policy.</td>
<td>The paragraph could be amended to (new text in red) 'Management of surface water flood risk is the role of Lancashire County Council in its capacity as Lead Local Flood Authority. As part of its duties, the LLFA is required to be responsible for investigating occurrences of flooding in line with the LCC Flooding Investigation Policy and preparing a Flood Risk Management Strategy (FRMS) for its area’. A footnote could be added to the LCC Flooding Investigation Policy providing a web link (<a href="https://www.lancashire.gov.uk/media/392349/Flood-Investigation-Policy.pdf">https://www.lancashire.gov.uk/media/392349/Flood-Investigation-Policy.pdf</a>).</td>
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<td>3.59 For clarification, the Local FRMS identified in this paragraph is a County-wide Flood Risk Management Strategy. This document is currently undergoing a refresh. A further review is planned when the National Flood Risk Management Strategy is published in the near future as any Local FRMS should follow the principles of the National Strategy.</td>
<td>A footnote could be added to the ‘Lancashire and Blackpool Local FRMS 2014 – 2017’ to refer to the refresh and review.</td>
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<td>3.60 The objectives mentioned in this paragraph are currently being updated as part of the Local FRMS refresh. Future objectives could be captured within a Business Plan model.</td>
<td>A footnote could be added to ‘number of objectives’ that refers to the refresh and review.</td>
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<td>3.61 The Local FRMS is a County-wide strategy. At present the LLFA has no capacity to develop a Parish specific FRMS mentioned in the referenced paragraph. However, we will be happy to comment on any Parish FRMS proposals and offer appropriate advice. For clarification, LLFA and other Risk Management Authorities encourage direct reporting of flooding incidents to an appropriate RMA. The information collected by the BFG serves as a relevant and useful record of flooding in the area, however only incidents reported directly to an appropriate authority can be recorded and actioned efficiently by the</td>
<td>Comments noted. No change is considered necessary to this paragraph as a result of the comments.</td>
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The LLFA in its overseeing role is interested in being informed about all flooding incidents, however for the reasons listed above prompt reporting of incidents directly to the responsible RMA is also encouraged.

**Section 6**

**Policy BPI1: Development and Infrastructure**
The LLFA has no specific comments to make regarding the wording of this policy. However, in regards to Reasoned Justification 6.1.15, we would like to emphasise that as a statutory consultee, the LLFA already makes full assessments of new development applications based on current legislation, planning guidance and recognised best practice. It is worth highlighting that there are constraints to what statutory consultees can request from applicants.

Comments noted. No change is considered necessary to this policy or Reasoned Justification as a result of the comments.

**Policy BPI2: Surface Water Drainage**
The LLFA fully supports the wording of this policy and welcomes its recommendations. The policy could also include a request for consideration for climate change in designing drainage systems and include a request for urban creep allowance to be included in drainage system design for residential development. A recommendation could also be given for construction phase flooding mitigation plans, to ensure development does not increase the risk of flooding during its construction phase. The LLFA is willing to provide BPC with further information regarding any of the above, should they wish to incorporate the above aspects into the Policy or its Reasoned Justification.

The support for the wording of this policy is noted and welcomed.

BPC would be happy to include both suggestions. However, BPC is aware that by introducing new elements to the policy at this stage consultees and other stakeholders would not have a chance to comment on it. As such it would be considered most appropriate to include them in the Reasoned Justification.

This could be added as a new paragraph to the Reasoned Justification after paragraph 6.1.19 as follows ‘Applicants should note that the LFFA has a preplanning application flood risk and land drainage advice service for planning applications. This is a charged for service and can be utilised by applicants to discuss the details of development surface water proposals prior to submitting a formal application. Further information regarding this service can be found on https://www.lancashire.gov.uk/business/business-services/pre-planning-applicationadvice-service/pre-planning-application-flood-risk-and-land-drainage-advice-service/.

**Policy BPI3: Foul Water Drainage**
The LLFA supports the wording of this policy. We suggest that within Reasoned Justification

The support for the wording of this policy is noted and welcomed.
6.1.20 for this policy a clarification is made in the last sentence to read: "It is therefore of great importance that the Surface Water Hierarchy (see below) is followed to reduce the impact of new development in the area." This is to make it clear that the hierarchical approach should refer to surface water and not foul water proposals. The LLFA understands why the surface water hierarchy is mentioned in this section as poor management of surface water can impact on the foul water drainage systems. In addition, in all of the sub-points of Reasoned Justification 6.1.20, approval from LLFA should be added to the list of necessary approvals. The LLFA is a statutory consultee on drainage for major planning applications and makes recommendations to the Local Planning Authority as to the surface water disposal method, rates and volumes. United Utilities or other body's comments are considered by the LLFA however it is the duty of the LLFA as a statutory consultee to make the recommendation to the Local Planning Authority. Similar to previous comments, Reasoned Justification 6.1.22 can include information about the LLFA pre-application advice for Flood Risk and Land Drainage Consents. This suggested amendment is considered to be acceptable and helps clarify the point (please see also response to United Utilities below on this paragraph).

The suggested amendments are considered to be acceptable.

This could be added to the Reasoned Justification after paragraph 6.1.22 as follows ‘Applicants should note that the LFFA has a preplanning application flood risk and land drainage advice service for planning applications. This is a charged for service and can be utilised by applicants to discuss the details of development surface water proposals prior to submitting a formal application. Further information regarding this service can be found on https://www.lancashire.gov.uk/business/business-services/pre-planning-application-advice-service/pre-planning-application-flood-risk-and-land-drainage-advice-service/.

The Environment Agency

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<td>Paragraph 6.1.21 states ‘Reference should be to BFG’s flooding database and the EAs surface water flooding maps when demonstrating capacity before connections are made to existing foul/surface water drainage system.’ We request that the following section is removed from the plan ‘and the EAs surface water flooding maps’ as the EAs surface water ...............................................................................................................................................................................................................................................................................................................................................................................................................................................................................................................................................................................................</td>
<td>This paragraph is suggested to be amended as a result of comments from West Lancashire Borough Council. Please see response to this above.</td>
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flood map is not a tool to be used to determine suitability of connection to the public sewer system.

The Canal and River Trust

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<td>BP12 – Surface water drainage</td>
<td>In response to the comments the policy wording at the third paragraph 4th sentence could be amended to (new text in red) ‘A discharge to groundwater or watercourse may require the consent of the Environment Agency or Lead Local Flood Authority and, in the case of potential discharge to a canal, the Canal &amp; River Trust’. The Reasoned Justification could be amended adding after paragraph 6.1.18 ‘Where sites are adjacent to the canal there may be capacity to accept surface water to the canal, subject to necessary consents being obtained. The Canal &amp; River Trust is not a land drainage authority, and such discharges are not granted as of right. Where they are granted, they will usually be subject to completion of a commercial agreement’.</td>
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United Utilities

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| 6.1.20 The West Lancashire Infrastructure Delivery Plan Update 2016/17 (Part 1) March 2017 highlights capacity issues with the sewer network and at the New Lane Waste Water Treatment Works (WWTW). In terms of the former there is a bottleneck in the system as the sewer narrows beneath the railway line. During intense rainfall the combined sewer network is unable to move the foul and surface water runoff through the network quickly enough leading to flooding of both surface and foul water. This is an unacceptable situation leading to public health issues as well as costs to people’s properties and livelihoods. It is therefore of great importance that the Water Hierarchy (see below) is followed to reduce the impact of new development in the area. In response to the comment BPC would suggest the current paragraph 6.1.20 is deleted and replaced with: ‘According to the West Lancashire Infrastructure Delivery Plan Update (October 2018)3, at paragraph 4.11, United Utilities have advised that New Lane WWTW is currently at capacity and that to treat any additional discharge, whilst maintaining accordance with Environment Agency (EA) standards, could be beyond financial and technical feasibility. There is likely to be further investment in the work to improve the quality of the treatment at New Lane WWTW, and this is currently anticipated to commence later in the UU AMP6 2015-2020 period or early in the AMP7 2020-2025 period. In terms of the sewer network there is a bottleneck in the sewer system as the sewer narrows

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United Utilities would strongly recommend amendments to the wording in 6.1.20, as it is not accurate of the current situation. There are no capacity issues at New Lane Wastewater Treatment Works. We would request removing this aspect as it isn’t correct and are happy to discuss this further.

We would like to suggest the following amendments, to replace 6.1.20:
There is a bottleneck in the sewer system as the sewer narrows beneath the railway line. In very intense rainfall this can lead to sewer flooding at locations within the Burscough sewer network. It is therefore of great importance that the surface water hierarchy is followed to prevent it from entering the combined sewer network and ensuring new development is delivered in the most sustainable way.

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3. Would the Parish Council please respond to the suggestion that the requirement in Policy BPI1 for Infrastructure Delivery Statements is unnecessary insofar as it applies to Yew Tree Farm because (as page 36 the Yew Tree Farm Final Masterplan Supplementary Planning Document makes clear) infrastructure provision will be co-ordinated and funded across the whole site.

It is considered that there is no conflict between the infrastructure requirements outlined within the Yew Tree Final Masterplan SPD and that within policy BPI1. The policy within the Burscough Parish Neighbourhood Plan could be considered to carry greater weight than the SPD due to the process that the Plan has been through. The provision of infrastructure associated with new development is a significant concern for local residents and businesses as highlighted during the various consultation events. The policy provides an additional level of detail and a distinct local approach to that set out in the strategic policy without conflicting with the requirements of the SPD or the strategic policy SP3.

4. Would the Parish Council please respond to the suggestion that Policy BPE1 does not recognise the role of uses such as cafes, gymnasiums, play centres and children’s nurseries which can play a complementary role in industrial estates.

Policy BPE1 part B criteria 4 allows for small scale ancillary use to meet the needs of those employed and working within the estate. This would include uses such as those listed above. These uses would be allowed under this policy subject to the proposed development satisfying other relevant criteria within this policy and other policies within the development plan.

5. A number of the Neighbourhood Green Spaces identified in Policy BPEV1 appear to be in Green Belt and thus are protected by that designation. What additional local benefit would be gained by designating such land as a Neighbourhood Green Space?

Policy BPEV1 part B, which relates to Neighbourhood Green Space, is considered to be complementary to Green Belt policy and ensures that the outdoor recreational function of a
Neighbourhood Green Space is taken into consideration, along with other material considerations, in assessing proposals on such sites.

6. A number of Neighbourhood Green Spaces identified in Policy BPEV1 are school playing fields. While Policy EN3 of the West Lancashire Local Plan 2012-2027 establishes that school playing fields are part of the Green Infrastructure Network, it may be that such land will be required for future school expansion. Policy BPEV1 would, on the face of it, preclude this. Is that correct? If so, is this justified?

Policy BPEV1 part B allows for development on Neighbourhood Green Spaces provided certain criteria are met. This includes demonstrating there is a surplus of green space provision through an objective assessment (criterion 1) or that the recreational function is retained on-site or provided off-site (criterion 2). It would only preclude development if the criteria could not be met and there were no other material considerations.

7. One of the Neighbourhood Green Spaces identified in Policy BPEV1 is within the Community Hub Opportunity Area identified in Policy BPC2 within which mixed use development will be supported. Are these two policies compatible?

It is considered that the two policies are compatible. Part A of policy BPC2 supports proposals for mixed use development which includes leisure, recreation and community uses providing certain criteria are met. Part B of policy BPC2 supports proposals for non-leisure, recreation and community uses provided it enables the delivery of enhanced leisure, recreation and community uses elsewhere within the Opportunity Area (policy BPC2 B criterion 1). Where an existing facility, such as a Neighbourhood Green Space, would be lost as a result of development and where it is demonstrated there is need for these facilities, then the proposal should include for the replacement of these facilities (policy BPC2 criterion 2). This is in line with policy BPEV1 part B criteria 1 and 2.

8. The supporting text to Policy BPEV2 makes clear that there are both designated and non-designated heritage assets in the Plan area. However, Policy BPEV2 itself appears to refer only to non-designated heritage assets. Is that correct?

Yes, policy BPEV2 deals with non-designated heritage assets only which are those buildings or structures on West Lancashire Borough Council’s Local List. Paragraph 6.7.12 in the Reasoned Justification provides the background to the designated heritage assets within the Plan area and cites the relevant development plan policy. Paragraphs 6.7.13 and 6.7.14 provide the context to those buildings and structures that are considered to be locally important and are dealt with by Policy BPEV2.