

Planning Policy Team
Sefton Council
Planning Department
Magdalen House
Trinity Road
Bootle
L20 3NJ

SENT BY EMAIL
spd@sefton.gov.uk
25/02/2022

Dear Planning Policy Team,

INFORMATION NOTE: MANAGING AND MITIGATING THE IMPACT OF RECREATION PRESSURE ON THE SEFTON COAST

1. Thank you for consulting with the Home Builders Federation (HBF) on the Information Note on Sefton's Interim Approach to the mitigation and management of recreation pressure on the Sefton Coast.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The Information Note sets out Sefton Council's Interim Approach to the mitigation and management of recreation pressure arising from new housing development in Sefton on the internationally important nature sites on the Sefton Coast. These include the Sefton Coast Special Area of Conservation, Ribble and Alt Estuaries Special Protection Area (SPA) and Ramsar Site, Mersey Narrows and North Wirral Foreshore SPA and Ramsar Site and Liverpool Bay SPA. The Council states that the Information Note is a material consideration for proposals for new housing in Sefton.
4. The note sets out that the opt in mitigation measures are based on commuted sum contributions plus information leaflets for new first-time occupiers. The commuted sum contributions are:
 - £299 per new home in the core zone (closest to the Coast, this includes Bootle, Crosby, Formby and Southport).
 - £63 per new home in the outer zone (away from the Coast, this includes most of Sefton East).The Council states that these amounts are 2021-22 prices, and that the amount will be adjusted each year in line with inflation. It also states that these contributions will only be required for schemes of 10 or more new homes (net).
5. The Council also highlight that this is an opt in scheme and will not be compulsory, if applicants do not wish to opt-in to this scheme, they must make sure that sufficient bespoke information is provided with their planning application.



6. The HBF is concerned about the use of this Information Note as a material consideration and to introduce a financial burden on a planning application. It should be noted that PPG (ID: 61-008) states that *'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.'*
7. The HBF has concerns particularly in relation to the additional financial burden this Information Note would create for developers. Whilst the HBF note that currently this is an Opt-In scheme, the note suggests that applications could be made more complicated and require more costly evidence, take longer to determine and potentially still be subject to unidentified charges, reducing the option of not Opting into the approach set out in the note. The HBF would strongly recommend that the Council undertake a full viability assessment of this Information Note to ensure that it is viable and that it does not impact on the delivery of homes. The NPPF¹ establishes the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.
8. The HBF is also concerned that this Information Note is being introduced without the full consultation and examination that would have been given during the examination process, as would be befitting a new policy approach as is set out in this note. The HBF do not consider that this is appropriate and do not consider that the Information Note should be taken forward at this time.

Future Engagement

9. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
10. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



Joanne Harding
Planning Manager – Local Plan (North)
Email: joanne.harding@hbf.co.uk
Phone: 07972 774 229

¹ NPPF (2021) Paragraph 34