



Please set out your representation [including objections or comments in support] to the Sefton Local Plan. Please state clearly the relevant section, policy, paragraph, figure or site allocation that you are commenting on, using additional sheets if required. If you are submitting supporting information please list this here. Supporting information must also be submitted by 27 March 2015.

List of Supporting Information.

- Ainsdale Community Wildlife Trust...information brochure.
- Business Plan...to create a Low Dune Nature Reserve.
- Report Houston & Houston 2012 feasibility of site.
- Ecological Survey Reports...Smith & Lockwood 2013/2014
- Sefton Coast Partnership...information brochure.

MN2 Housing Allocations

MN2.8 Former Ainsdale Hope School, Ainsdale. Site ref SR4.06

As a Trust we are objecting to the proposed house building on the above site, in particular the playing fields as we consider the Local Plan unsound.

As a Trust we are putting forward an alternative proposal to create and maintain a **Low Dune Nature Reserve**.

We are supporting this site, in particular the playing fields, to create a nature reserve taking into account the richness and environmental importance of the playing fields and surrounding area of this location.

The following points are supportive of our objections to the Local Plan, and proposed house building within an area of such environmental importance.

1. The site lies adjacent to the Sefton Coast Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and supporting a fixed- dune vegetation...listed as a priority for conservation under an EU Habitats Directive (ecological reports enclosed).
There is an alternative proposal being put forward to create a Low dune Nature Reserve. This will provide both ecological and environmental benefits as the planned development will provide additional habitats for further plant and animal wildlife to flourish, while protecting existing habitats allowing nature to be enjoyed by all.
2. Ecological Survey Reports (enclosed) in 2013/2014 on the playing fields identified outstanding botanical Interest...153 vascular plants with 8 being regionally or nationally notable (reports enclosed). A recommendation to the Merseyside Environmental Advisory Service for Local Wildlife Site status following 2014 survey, this location we are advised may merit inclusion in the Sefton Coast SAC.
3. A colony of Sand Lizards including female breeders has recently been identified within 50 Mtrs of this site by the North Merseyside Amphibian & Reptile Group much respected within Sefton. They are regarded as a Species of Principal Importance for the conservation of biodiversity and are protected in England under Section 41 of the Natural Environment and Rural Communities Act 2006 and a Habitats Regulation Assessment.
This information is still to be recorded and taken into account.
4. The playing fields originated from levelled sand dunes adjacent to the Birkdale

Please return to local.plan@sefton.gov.uk or Local Plan Team, Magdalen House, Trinity Road, Bootle L20 3NJ by **Friday 27th March 2015**

**Sefton Local Plan
Publication Draft
Representation Form**

Sandhills Local Nature Reserve which is part of the Sefton Coast SSSI and SAC. Because the playing fields have not been used for this purpose since the closure of the school in 2007 its existing habitats have begun a slow process of reversion towards those resembling priority dune habitats. This process has occurred without any management of the site other than twice yearly mowing...this site if managed as is the proposal by the Ainsdale Community Wildlife Trust would become an important wildlife site (survey reports enclosed).

The above are some of the issues which we believe should be taken into account to meet our request for a Low Dune Nature Reserve at this location. This would require a change to be made within the Local Plan.

All the above facts indicate this location is rich and environmentally important in its own right recognising its heritage, recently identified plant and animal wildlife and its close proximity to both SSSI and SAC locations.

Concerns:

The site assessment form refers to this location as brownfield....it is considered Greenbelt?

Having identified both rare plant and animal wildlife either on site or in close proximity (SSSI and SAC locations) an HRA should not be dependent on a planning application but should be carried out in its own right recognising the plant and animal wildlife identified.

We recognise the right to build on the current footprint of the former school buildings. However building on the footprint of the school AND the playing fields would have a detrimental effect on SSSI and SAC locations because of the close proximity to the planned housing.

Please visit our website www.acwt.org.uk/visualwalkthrough and enjoy a journey through our proposed nature reserve.

Blank lined paper for writing.



Please set out the changes you consider necessary to the Sefton Local Plan to address the comments made in the previous sections. You will need to say why this change will make the Local Plan legally compliant or 'sound'. It would be helpful if you could suggest revised wording if appropriate. Please be as precise as possible. Use additional sheets if required.

As a Charitable Trust our alternative proposal is to create a Low Dune Nature Reserve recognising the environmental importance of the playing fields and surrounding area. SSSI/SAC. (ACWT brochure/feasibility/survey reports enclosed).

Our proposed changes to the Local Plan is for a change of use from a site for housing to a nature reserve which will recognise the current and past environmental importance of this location...

We request that the former Ainsdale Hope School, Ainsdale MN2.8 be removed from the Local Plan as a proposed site for house building.

As a Trust we find the Local Plan unsound because the evidence supporting this location as an environmentally and unique situation has not been taken into account by Sefton Council. Recognising the origins of the playing fields and following ecological surveys the site should be allowed to be returned to a low dunes habitat and as an important part of the Ainsdale Dunes SAC.

The biodiversity of the site has been acknowledged in reports, Smith & Lockwood 2013 & 2014 and Houston & Houston 2012 (reports enclosed).

The proposed nature reserve will ensure the rare plants, recently identified, and protected Sand Lizards and other endangered flora and fauna will be protected.

This is a magical area that cannot be lost.

As a Trust we would welcome the opportunity to meet with appropriate representatives to discuss in detail our plans and commitment for this project.

Project.....Low Dune Nature Reserve

The development of a low dune nature reserve with planned management will provide a safe and secure environment for all age groups including the elderly, those with disabilities and young people.

Educationally there will be the opportunity for young people, adults and organisations to take advantage of the environmental richness of the reserve.

The planned project will provide additional habitats for further plant and animal wildlife to flourish while protecting existing habitat allowing nature to be enjoyed by all.

The Trust will provide the community, and the wider area of Sefton, with a nature reserve



that can be easily accessed, and enjoyed, creating a sense of wellbeing to all those who visit the site.

Please refer to our brochure for further information on the additional advantages of a nature reserve. (brochure and business plan enclosed)

This proposal has been aided and supported by environmental professionals and we appreciate their guidance. Our project has been made known to Sefton Council Planning Department. The nature reserve will both compliment and highlight the environmental richness of Ainsdale's heritage for present and future generations to enjoy.

We have been gifted with an area that is continually changing providing additional rare and beautiful plant and animal wildlife and this should not be lost but promoted to be enjoyed by all.

This project will be fully funded, and maintained to the highest of standards, by the Trust who will work closely with the Council and other organisations in the best interest of communities and the wider area of Sefton. (business plan enclosed)

We have strong support from within the community including the Ainsdale Civic Society, Merefield Special School, North Merseyside Amphibian and Reptile Group and the Wildlife Trust for Lancashire, Manchester and North Merseyside, with many other groups both locally and further afield.

We have enclosed supporting literature as listed.

While not recommending a change to policies within the Local Plan we would ask that they are supportive to our "change of use" for the Ainsdale Hope site to become a Nature Reserve rather than a site for house building, in particular the playing fields.

While we acknowledge there is a right to build on the footprint of the former school buildings.

Local Plan policies

NH2 Protection and Enhancement of Nature Sites, Priority Habitats and Species

Development which may result in a likely significant effect on an Internationally important site must be accompanied by sufficient evidence to enable the Council to make a Habitats Regulations Assessment.

Policy NH4 Sefton Coast and Development

Development which may have an adverse effect on internationally important nature sites will only be permitted where it can be demonstrated there are no alternatives and imperative reasons of overriding public interest and where compensatory provision has been made.

Policy SD2 Principles of Sustainable Development.

Not adversely affect the integrity of Internationally important nature sites or their supporting habitats. Project specific habitats regulations assessments are undertaken where required ensuring the continued integrity upon European designated sites

Residential Allocations.

It is noted that MN2.8 has the potential to increase recreational pressure upon the



European sites. Any planning application should seek to avoid increased recreational pressure upon the SAC and address any likely significant effects upon these habitats as a result of the individual project alone.

Policy NH2 Existing Mitigation and Recommended Changes to Local Plan.

Development which may result in a likely significant effect on an Internationally important site must be accompanied by sufficient evidence to enable the Council to make a Habitats Regulations assessment. Adverse effects should be avoided, or where this is not possible they should be mitigated, to make sure that the integrity of Internationally important sites is protected.

Development which may adversely affect the integrity of Internationally important sites will only be permitted where there are no alternative solutions and there are imperative reasons of overriding public interest, and where compensatory provision has been made. THIS ALSO APPLIES TO SITES AND HABITATS OUTSIDE THE DESIGNATED BOUNDARIES THAT SUPPORT SPECIES LISTED AS BEING IMPORTANT IN THE DESIGNATIONS OF THE INTERNATIONALLY IMPORTANT SITES.

The proposed building of properties, 243 new homes, would prove detrimental to the plant and animal wildlife on SSSI and SAC sites which are in close proximity to the proposed housing development.

The recent identification of rare plants, and the quality of other fauna and flora on the playing fields, would be destroyed by the proposed development.

The human presence on such a development together with domestic animals would vastly increase the recreational pressure upon the SAC in addition to the harm to plant & animal wildlife (Sand Lizard)

The above policies (red) all provide for the importance of the Ainsdale location to be acknowledged. We therefore request that these policies are adhered to prior to any decisions being made.

We wish to acknowledge the Sefton Coast Partnership who follow the EU principles of management in developing plans and strategies for the Sefton Coast (brochure enclosed) and we advise we have respected their guidelines.

We particularly note the following....Conservation is the careful management of change. It is about revealing and sharing the significance of places and ensuring that their special qualities are protected, enhanced, understood and enjoyed by present and future generations.

We thank you for reading our submission.



If your representation is seeking a change to the Sefton Local Plan, do you consider it necessary to participate in the examination hearing? (please note this will be at the discretion of the Inspector)

No, I do not wish to participate in the examination hearings ☐

Yes, I do wish to participate in the examination hearings ☒

If you wish to participate in the examination hearings, please outline why you think this is necessary
To provide detailed evidence supporting our objections and proposals.

Please indicate whether you wish to be notified of any of the future stages of the Sefton Local Plan:

When the Sefton Local Plan has been submitted for independent examination ☒

Confirmation of the timetable for the examination hearings ☒

The publication of the Inspector's recommendations following the examination ☒

The adoption of the Local Plan ☒

NOTES TO ACCOMPANY THE REPRESENTATION FORM

The Sefton Local Plan is published between 30 January and 27 March 2015 in order for comments or 'representations' to be made prior to it being examined by an independent Inspector. All representations received will be submitted to the Inspector to be considered as part of the Local Plan examination.

Legal compliance

To be 'legally compliant' a local plan has to be prepared in accordance with the Duty to Cooperate and legal and procedural requirements. This is required by legislation and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

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Test of Soundness

To be 'sound' a local plan should be positively prepared, justified, effective and consistent with national policy. These terms are explained in the National Planning Policy Framework 2012 (paragraph 182):

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified - the plan should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence.

Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

General advice

If you wish to make a representation(s) seeking a change to the Sefton Local Plan Publication document, you should make clear in what way the Plan is not legally compliant or sound having regard to the four tests set out above. You should try to support your representation by evidence showing why the Local Plan should be changed. It will be helpful if you say precisely how you think the Local Plan should be changed.

Representations should cover succinctly all the evidence and supporting information necessary to back up your representation and suggested change. The representations received on the Local Plan will assist the Inspector in making recommendations to the Council in order for it to adopt the Sefton Local Plan.

Further detailed guidance on the preparation, publication, examination and adoption of local plans is provided in the National Planning Policy Framework and on the Planning Portal website

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<http://www.planningportal.gov.uk/planning/planningsystem/localplans>