

Our Considerations



Stage 2

November 2020 - February 2021



**LIVERPOOL
CITY REGION**
COMBINED AUTHORITY

METROMAYOR
LIVERPOOL CITY REGION

**PLANNING
AWARDS 2020**
WINNER

Energy and Resources – Our Considerations

1. Issues and Opportunities

- 1.1. The need to take action in response to the global climate change is well documented. [Towards a Green Future for the Liverpool City Region](#)¹ sets out the key challenges and actions that we as a City Region can take. These include **global warming** and the imperative to decarbonise the economy; as well as the need to better manage our resources and move to a zero-waste and circular economy.
- 1.2. In the context of the COVID-19 pandemic, the opportunity to achieve a [green recovery](#) in the City Region, driven by investment in low carbon industries and renewable energy projects, gives further impetus to act. Spatial planning can play a key role in implementing these actions, helping to facilitate and deliver them in land use terms².
- 1.3. With regards to carbon dioxide (CO₂) - the main greenhouse gas and contributor towards global warming – the Liverpool City Region (LCR) as an area has relatively high emission levels given its geographical size by national comparison (6,926 kilotonnes of CO₂ in 2018)³. However, per head of the population, the City Region has less emissions than the UK average⁴.
- 1.4. Estimates show CO₂ emissions in the LCR are falling faster than both the national average and the average for the North West and are now at less than 61% of what they were in 2005, indicating a significant improvement⁵.
- 1.5. In terms of existing renewable / low carbon energy generation, the LCR has a range of sources including solar, biomass, landfill gas, offshore and onshore wind⁶. Offshore wind is the most significant with Burbo Bank and the Burbo Bank extension capacity amounting to 4% of offshore wind capacity in the United Kingdom (17% of the North West)⁷.
- 1.6. Opportunities for renewable energy provision in the LCR to reduce carbon emissions and tackle climate change were previously identified in a 2010 study by

¹University of Liverpool Heseltine Institute (2019)

²[RTPI \(2020\) 'Plan the World We Need'](#)

³According to BEIS estimates for local authorities

⁴According to BEIS estimates for local authorities

⁵According to BEIS estimates for local authorities

⁶AECOM (2020) 'IIA Scoping Report'

⁷[Ostead](#) and [BEIS](#)

Arup⁸. This included large scale onshore wind, biomass and district heating. The need to undertake updated work on this matter as part of the SDS's preparation is being considered by the CA.

- 1.7. Harnessing the tidal power of the River Mersey is a key priority for the Metro Mayor and Combined Authority with the potential to generate significant long term renewable energy capacity, contributing towards both carbon reduction targets and benefitting the local economy. A range of potential schemes are currently being considered as part of this ongoing project.
- 1.8. The Combined Authority is also supporting initiatives with industry in the delivery of hydrogen as a clean fuel to power transport, and as a methane replacement in the gas grid contributing towards a zero carbon economy.
- 1.9. The move towards a '[circular economy](#)' will mean using fewer natural resources, producing less waste, reusing and recycling, and recovering value for residual material such as energy in line with the [waste hierarchy](#). Disposal of waste must be the last resort.
- 1.10. Planning for the management of waste in the LCR is dealt with by the [Merseyside and Halton Joint Waste Local Plan \(2013\)](#). It covers all aspects of waste management including waste prevention and the provision of a network of facilities to manage waste materials generated across a range of sources in line with the waste hierarchy.
- 1.11. The LCR generates lower levels of household waste per person than regional and national equivalent figures (2018/2019)⁹. Rates of recycling¹⁰ have been experiencing a decline in recent years although targets to limit the amount of residual waste sent to landfill are being met (currently approx. 4%), with almost all remaining residual waste being recovered for energy¹¹.
- 1.12. In terms of mineral resources, there is little in the way of extraction of land won (or primary) minerals in the LCR although historically this has been significant. The City Region does, by virtue of its port facilities, play a key role in the landing and subsequent distribution of marine-won aggregate resources (sand and gravel). It also has a number of facilities processing construction, demolition and excavation

⁸ Arup (2009/10) LCR Renewable Energy Capacity Study (Stage 1 & 2)

⁹ AECOM (2020) 'IIA Scoping Report'

¹⁰ Local Authority Collected Waste

¹¹ [Joint Merseyside and Halton Waste Local Plan Implementation and Monitoring Report 2018-19](#)

waste contributing to the supply of recycled aggregates. The LCR is one of the North West's main consumers of aggregate minerals needed in construction¹².

2. What is the Spatial Development Strategy required to do?

- 2.1. The issue of Climate Change and its consequences is one of the matters to which the LCR Spatial Development Strategy (SDS) must have regard in line with legislation¹³.
- 2.2. The [National Planning Policy Framework \(2019\)](#) sets out how the planning system should support the transition to a low carbon future in a changing climate, helping shape places in ways that contribute to radical reductions in greenhouse gas emissions. This includes encouraging the reuse of existing resources and supporting renewable and low carbon energy and associated infrastructure. Plans should also consider identifying suitable areas for renewable and low carbon energy¹⁴ sources, and supporting infrastructure; and facilitate the sustainable use of minerals, safeguarding mineral resources and infrastructure.
- 2.3. [National Planning Policy for Waste](#) outlines the role of planning in delivering Government's ambition for a more sustainable and efficient approach to resource use, driving waste management up the waste hierarchy.
- 2.4. The Government's [25 Year Environment Plan](#) seeks to put the environment at the heart of planning and development to create better places for people to live and work. It commits to making sure resources are used efficiently and kept in use for longer, promoting recycling and re-manufacture, and setting a target of eliminating all avoidable waste by 2050.
- 2.5. The Government's [Planning White Paper – 'Planning for the Future' \(2020\)](#) proposes significant reforms to the planning system. Central to the proposals is a move towards an interactive map and development 'rules' based approach to land use planning, supported by identification of renewal, growth and protection areas.
- 2.6. It also seeks to further the planning system's role in proactively promoting long term sustainability to meet the 25 Year Environment Plan's ambitions and envisages

¹² [Greater Manchester, Merseyside and Halton, and Warrington Local Aggregate Assessment 2019](#)

¹³ Greater London Authority Act 1999, Part viii as applied by Article 4(2) of the Liverpool City Region Combined Authority (Functions and Amendments) Order 2017, with modifications made by Part 1 of Schedule 1

¹⁴ Under current legislation, large scale renewable electricity generating schemes greater than 50MW (100MW for offshore) are considered [Nationally Significant Infrastructure Projects](#) (NSIPs) and are dealt with by the Planning Inspectorate on behalf of the government

planning playing a ‘strong part’ in efforts to mitigate and adapt to Climate Change. It refers to the role spatially-specific policies can continue to play in identifying opportunities where renewable energy creation could be accommodated.

3. What is being done by the Combined Authority?

- 3.1. The LCR Metro Mayor has set out the vision for the City Region to be the cleanest and greenest in the country and at the forefront of innovation in sustainable technology.
- 3.2. The Combined Authority (CA) declared a [Climate Emergency](#) in June 2019 with the target of making the LCR carbon neutral by 2040. The [LCR Climate Partnership](#) has been set up to co-ordinate the City Region’s response to the climate emergency and are preparing a Climate Action Plan.
- 3.3. The draft [LCR Local Industrial Strategy \(LIS\)](#) reaffirms the ambition to become a leading clean and green City Region, pioneering approaches and initiatives in the transition towards a zero carbon economy. Key commitments include the delivery of energy infrastructure including the [Mersey Tidal Energy Project](#); and embedding the principles of a [circular economy](#) and resource efficiency, with an ambition to be zero waste by 2040.
- 3.4. An emerging LCR Energy Strategy will provide a strategic framework to support the realisation of the LIS’s ambitions on energy.
- 3.5. In response to the COVID-19 pandemic, [Building Back Better](#) - the Economic Recovery Plan for the City Region – re-emphasises the CA’s commitment to tidal and hydrogen energy as key opportunities in generating investment and jobs as part of a low carbon economy and greener recovery.

4. What you told us

- 4.1. Responses to our previous SDS public engagement [‘LCR Listens: Our Places’](#) highlighted the following challenges and opportunities in relation to energy and resources:

Challenges

- The climate emergency is a matter of great concern to local communities in the Liverpool City Region. Taking meaningful action on climate change is about safeguarding future generations and ensuring the City Region is bold and visionary in its commitment to make the transition to a low carbon, circular economy, without leaving communities behind.
- We need to minimise waste and pollution to mitigate climate change.
- The need to facilitate renewable energy production – this includes wind energy (the use of which is restricted by national planning policy), solar power, and a potential tidal energy project.
- Rapid growth in renewable energy is needed to wean the off UK fossil-fuels. Sustainable energy infrastructure and renewable energy production must be delivered across the region in partnership with local authorities, communities, the renewable energy sector and energy utilities.
- We need to see a lot more training and job opportunities in the green economy.
- It is critical to ensure the protection of public water supply.
- Recognition of the role of mineral infrastructure in supplying building materials - wharfs and other infrastructure should be safeguarded from other development.
- It's critical we deliver sustainable waste infrastructure for the future competitive and carbon performance of the City Region.

Opportunities

- Promote sub-regional priority projects for clean energy - there needs to be a significant push on clean energy given the resources presented by the LCR's estuarine and maritime location.
- Designate areas potentially suitable for renewable energy production – for example wind turbines and solar farms, supported by evidence.
- Take a sustainable approach to waste, including a design approach which encourages the re-use of materials (e.g. building materials), improved or enhanced water management and use of sustainable materials and resources .
- Zero waste/ less biodegradable waste to landfill – increase in recycling, more re-use rather than single-use.
- Take a sustainable approach to using mineral resources.

5. How we could respond

5.1. Based on the above considerations and feedback we have received, a suggested policy approach is set out below.

To plan strategically for energy and resources, taking account of climate change, we suggest a policy approach that would:

- Support and identify strategic and sustainable opportunities for renewable and low carbon energy provision and associated infrastructure to help meet carbon reduction targets and support a green economic recovery. This will be in alignment with LCR's [Economic Recovery Plan](#), [Local Industrial Strategy](#) and Energy Strategy (when finalised) and informed by updated evidence.
- Ensure the management of LCR's waste is driven up the waste hierarchy to meet targets in alignment with the [Merseyside and Halton Joint Waste Local Plan](#) (or any subsequent update).
- Reinforce the principles of resource efficiency in building design and construction, including maximising the use of high quality recycled and sustainable building materials.
- Promote the use of secondary and recycled materials to conserve primary resources and reinforce the need to safeguard mineral resources and associated supply infrastructure (to be identified, where relevant, in Local Plans).
- Reinforce the need to ensure protection of water resources for public supply, consistent with advice from United Utilities and the Environment Agency.

We are also suggesting separate policy approaches for energy and resource (including water) efficiency of new buildings as part of Placemaking & Communities policy considerations.

5.2. We welcome your views on this. Comments received will help us in drafting a policy. We will review and refine this suggested policy approach in response to any further details that emerge following the Planning White Paper and as we develop our evidence base.

6. Which Objectives will this approach help to achieve?



Tackling Climate Change and creating a greener City Region



Delivering an Inclusive Economy

7. How can we make sure this approach would work?

7.1. Suggested ways and resources could include:

- Using digital tools (e.g. [SCATTER](#)) to plan, measure / monitor climate mitigation / adaptation improvements.
- Monitoring the percentage of renewable energy generated in the LCR ([Govt. data](#)).
- Updated evidence base on renewable energy capacity (TBC).
- Waste data and recycling rates (including [Waste Local Plan Monitoring Reports](#)).
- Monitoring of primary and secondary mineral production detailed in sub-regional [Local Aggregate Assessments](#).

Climate Change & The Environment

Natural Environment and Green Infrastructure - Our Considerations

1. Issues and opportunities

- 1.1. The need to take action in response to the global climate and ecological emergencies is well documented. [Towards a Green Future for the Liverpool City Region](#)¹ sets out the key challenges and actions that we as a City Region can take, in particular:
- **Global warming** and how we enable effective climate resilience.
 - **Biodiversity loss** and how we arrest species decline and conserve / re-wild habitats.
- 1.2. Spatial planning can play an instrumental role in meeting these challenges, with land–use policies concerning the natural environment and Green Infrastructure capable of delivering positive change.
- 1.3. The Liverpool City Region (LCR) comprises 80% blue / green space, providing a unique and valuable asset estimated to be worth £100bn². This diverse network of green and blue spaces or ‘Green Infrastructure’ is both urban and rural including agricultural land, woodland, coastal areas, rivers, parks and open spaces, playing fields, street trees, allotments and private gardens.
- 1.4. Green Infrastructure is multi-functional and provides a wide range of environmental and quality of life benefits. Work carried out by [The Mersey Forest](#) highlights the importance of the LCR’s Green Infrastructure as a significant asset, helping to support and deliver:
- **Economic growth** – providing an environment attractive to investment and jobs.
 - **Health and wellbeing** – contributing to improved physical and mental health, reduce health inequalities, reduce costs for the NHS³ plus opportunities to increase cycling and walking.
 - **Climate Change resilience** – providing natural adaptation and mitigation measures.

¹University of Liverpool Heseltine Institute (2019)

² Nature Connected: <http://www.natureconnected.org/key-message-2/>

³ Natural Health Service: <https://naturalhealthservice.org.uk/wordpress/>

- **Recreation, leisure and tourism** – providing attractiveness and setting to support the visitor economy.
- **Ecology** – safeguarding and improving biodiversity and providing opportunities for creation of larger, more connected and better managed habitats.
- **The rural economy** – supporting food and energy production, jobs and rural diversification opportunities.

- 1.5. Predicted climate change effects for North West England are drier summers with more frequent and severe periods of drought, and wetter winters with increased rainfall⁴. Combined with rising sea levels, flooding (including surface water, coastal and rivers) is of key concern to the LCR with considerable properties potentially at risk⁵.
- 1.6. Planned, well designed, and managed Green Infrastructure can offer effective Climate Change adaptation and mitigation measures. For example managing flood risk naturally through [sustainable drainage systems](#) ('SuDS'), reducing run-off to '[slow the flow](#)' of rivers and streams across catchment areas, and managing coastal change. It can also offer urban cooling.
- 1.7. It is also important to ensure that Climate Change impacts do not further social and economic inequalities. Considering the ability of different communities to cope with and recover from impacts, such as flooding, can help inform approaches to climate change mitigation or adaption and reduce disadvantages. The concept of '[Climate Justice](#)' seeks to address this, with mapping tools such as [Climate Just](#) available to inform where vulnerable communities lie. This is something we will consider further in developing the SDS's policy approach.
- 1.8. The COVID-19 pandemic and lockdown measures have further emphasised the importance of accessible, safe and quality green and open spaces for our physical and mental health and wellbeing. It has also highlighted existing inequalities of provision– especially in urban and more deprived areas⁶. Whilst mapping data indicates a good overall level of access to formal open space and informal

⁴ [The Mersey Forest \(2013\) 'LCR and Warrington Green Infrastructure Framework Technical Document'](#)

⁵ Environment Agency Flood Risk data and Merseyside Flood & Coastal Erosion Risk Management (FCERM) Partnership, see: <https://thefloodhub.co.uk/your-local-area/merseyside/#section-2>

⁶ RTPI (2020) '[Plan the World We Need](#)'

recreation areas across the LCR, this does not take account of its quality⁷. Various local authority level studies detail the quantity, quality and accessibility of open space in their areas, informing appropriate local standards set by Local Plans.

- 1.9. Tree planting and well-designed woodland creation in particular has been shown to deliver many benefits such as absorbing carbon dioxide and improving air quality⁸. In the LCR, significant levels of tree planting and woodland creation have already been achieved over the last 25 years through the work of the [Mersey Forest Partnership](#), delivering multiple social, economic and environmental benefits. The Mersey Forest Plan - [More From Trees](#) – seeks to build on this achievement setting out a long-term strategy for tree planting and woodland delivery in the City Region (with north Cheshire and Warrington).
- 1.10. Furthermore, potential to achieve even greater benefits at a sub-national scale exists in the creation of the [Northern Forest](#) with its ambition to plant 50 million trees across the north of England over the next 25 years. The Government has also set out its ambition to significantly increase tree establishment and woodland creation nationally as part of an emerging England Tree Strategy [England Tree Strategy](#).
- 1.11. The City Region’s natural environment contains a wide range of sites, areas and reserves designated for their high biodiversity value including ⁹:
- 4 international Ramsar Sites
 - 5 European Special Protection Areas
 - 3 National Nature Reserves
 - 19 Sites of Special Scientific Interest
 - 384 Local Wildlife Sites
 - 28 Local Nature Reserves
- 1.12. These biodiversity ‘assets’ in themselves serve many purposes such as providing important habitats for species, research opportunities, landscape value, leisure and recreation, health and wellbeing¹⁰.

⁷ AECOM (2020) ‘IIA Scoping Report’

⁸ Forestry Commission (2020) ‘Managing England’s woodlands in a climate emergency’

⁹ Nature Connected: <http://www.natureconnected.org/key-message-2/>

¹⁰ AECOM (2020) ‘IIA Scoping Report’

1.13. The well documented rate at which wildlife species are in decline – ‘biodiversity loss’ – has serious implications for humanity, who depend on a healthy natural environment for the provision of natural resources (such as food, pharmaceuticals, construction materials), a good physical environment (including air, soil and water quality), a functioning climate, and for general health and wellbeing¹¹. This highlights the importance of protection, conservation and enhancement measures.

2. Why does the Spatial Development Strategy need to address this?

- 2.1. The issue of Climate Change and its consequences is one of the matters to which the LCR Spatial Development Strategy (SDS) must have regard to in line with legislation¹².
- 2.2. There is also a strong legislative and policy framework already established to protect and enhance biodiversity, with the need to reverse its decline being addressed through new legislation requiring ‘biodiversity net gain’ from new development as part of the Environment Bill (see below). Subsequent stages of the SDS’s drafting will also be supported by a [Habitats Regulations Assessment](#) in line with regulations to assess any potential impacts on European designated sites.
- 2.3. The [National Planning Policy Framework \(2019\)](#) expects plans to take a proactive approach to mitigating and adapting to climate change, taking account of long term implications for flood risk, coastal change, water and biodiversity, amongst other matters.
- 2.4. It sets out what strategic planning policies should cover to meet priorities, including: the conservation and enhancement of the natural environment and green infrastructure; planning measures to address climate change mitigation and adaptation; and infrastructure for flood risk and coastal change management. Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital.
- 2.5. [Planning Practice Guidance](#) further highlights the benefits provided by multi-functional green infrastructure and details the role of strategic policies in identifying locations and setting protection and enhancement measures. It also sets

¹¹ RTPI (2019) ‘Biodiversity in Planning’

¹² Greater London Authority Act 1999, Part viii as applied by Article 4(2) of the Liverpool City Region Combined Authority (Functions and Amendments) Order 2017, with modifications made by Part 1 of Schedule 1

out the key planning considerations relating to biodiversity, geodiversity and ecosystems and how 'biodiversity net gain' can be secured.

- 2.6. The Government's [25 Year Environment Plan](#) seeks to put the environment at the heart of planning and development to create better places for people to live and work. It embeds a 'net environmental gain' principle for new development to deliver environmental improvements. It outlines how the '[natural capital approach](#)' - looking at the sum of the components of nature that either directly or indirectly bring benefit to people - will be taken to make choices and decisions. It aims to reduce the risks of flooding through expanding the use of natural flood management solutions.
- 2.7. The [Environment Bill 2020](#) sets out the statutory changes to implement the 25 Year Environment Plan. Key measures include:
- **Biodiversity net gain:** A mandatory requirement for housing and development to achieve at least a 10% net gain in value for biodiversity - habitats for wildlife must be left in a measurably better state than before the development. If net gain is not achievable on-site, the biodiversity gain plan will need to include off-site habitat enhancements.
 - **Local Nature Recovery Strategies:** New mandatory strategies for nature recovery that will identify opportunities and priorities for enhancing biodiversity and supporting wider objectives such as mitigating or adapting to climate change in an area.
- 2.8. The Government's [Planning White Paper – 'Planning for the Future' \(2020\)](#) proposes significant reforms to the planning system. Central to the proposals is a move towards an interactive map and development 'rules' based approach to land-use planning, supported by identification of renewal, growth and protection areas. It places emphasis on the use of digital technology and tools in plan making.
- 2.9. It would retain the principle of environmental protection recognising the 'vital role' of plans in identifying environmental designations. It also seeks to further the planning system's role in proactively promoting environmental recovery to meet the 25 Year Environment Plan's ambitions. It envisages planning playing a 'strong part' in efforts to mitigate and adapt to climate change as well as making our towns and cities more liveable through better green spaces and tree cover.

2.10. The Government are also assessing the extent to which their policies and processes for managing flood risk may need to be strengthened, along with developing a national framework of green infrastructure standards. Development of the SDS will therefore need to be mindful of these changes where relevant.

3. What is being done by the Combined Authority?

- 3.1. The LCR Metro Mayor has set out his vision for the City Region to be the cleanest and greenest in the country and at the forefront of environmental conservation and sustainability.
- 3.2. The Combined Authority (CA) declared a [Climate Emergency](#) in June 2019 with the target of making the LCR net carbon neutral by 2040. Following the 2019 LCR Year of the Environment and Environmental Summit, the [LCR Climate Partnership](#) has been set up to co-ordinate the City Region's response to the climate and ecological emergency.
- 3.3. The draft [LCR Local Industrial Strategy](#) recognises the City Region's unique natural environment as a valued asset, emphasising its importance in the making of a thriving and distinctive place. It sets the ambition to enhance this 'natural capital' through a partnership approach, creating and sustaining green spaces.
- 3.4. In response to the COVID-19 pandemic, the Economic Recovery Plan for the City Region - [Building Back Better](#) – embeds environmental sustainability as one of six principles guiding recovery initiatives. The Plan outlines the opportunities and imperative for a 'greener recovery' committing to engaging with Government on the devolution of tree planting and conservation in alignment with Mersey Forest Partnership's programme to 'Grow Back Greener'.
- 3.5. Work commissioned by the CA and undertaken collaboratively by the LCR Natural Capital Working Group¹³ on the creation of a LCR '[Natural Capital Baseline](#)' is nearing completion. This will provide an evidence base in the form of 'spatial dataset' or map based tool to support the implementation of the natural capital approach in the City Region. The tool enables the measuring and monitoring of natural capital levels across the City Region allowing an understanding of the range of goods and services this provides (known as 'ecosystem services'). For

¹³ A subgroup of '[Nature Connected](#)' (the LCR Local Nature Partnership).

example, woodland that sequesters and stores carbon contributes towards climate change regulation; or parks and open space provide access to nature giving mental and physical health benefits. It also allows us to model where the natural environment has capacity to provide certain ecosystem services alongside the areas where they are in demand¹⁴.

3.6. This baseline can be utilised to estimate environmental net gains from proposals and plans and to inform and identify where any strategic improvements / investments should be focussed to provide greatest benefit or meet greatest needs.

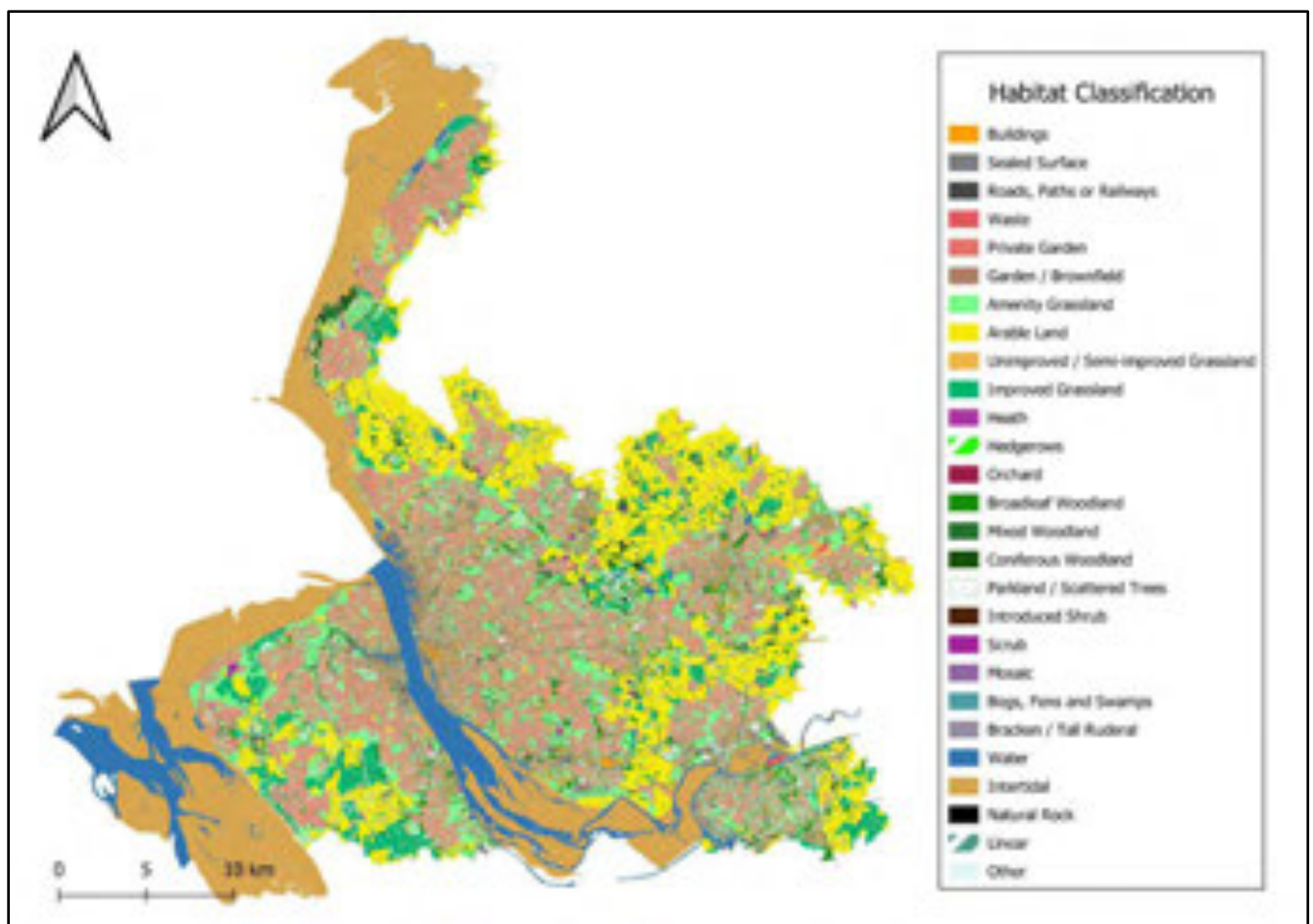


Figure 1. LCR Natural Capital Baseline

¹⁴ See: <http://www.natureconnected.org/wp-content/uploads/2020/06/Liverpool-City-Region-Natural-Capital-Baseline-June-2020.pdf>

Building on the existing [LCR Ecological Network](#) and Nature Improvement Areas, the baseline can contribute towards development of a Nature Recovery Network.

- 3.7. The Combined Authority also intends to commission work on assessing flood risk (from all sources) at a strategic level in the City Region with advice from EA and other partners in order to further develop policy.

4. What you told us

- 4.1. Responses to our previous SDS public engagement '[LCR Listens: Our Places](#)' highlighted the following challenges and opportunities in relation to the natural environment, Green Infrastructure, and climate impacts including flooding:

Challenges

- Protecting and maintaining our green and open spaces such as parks for their importance to health and wellbeing.
- Increasing people's access of green spaces.
- When targeting spending for climate change adaptation, it is crucial we are guaranteeing that the communities most at risk of the effects of climate change (e.g. flooding) are prioritised.
- Habitat loss is the biggest threat to biodiversity – we need to stop the decline of wildlife populations.
- Mitigating climate emergency impacts, including proactively managing flood risk.
- The Liverpool City Region has a significant flood risk and is particularly vulnerable to the risk of surface water flooding due to its urban nature and impermeable surfaces generating surface water flows.
- Tree cover is low in the LCR, this needs to be addressed.
- Need to reprioritise planning to create a sustainable balance of land uses to the benefit of people, nature and the environment.

Opportunities

- Creating more opportunities for people to experience nature by improving access to and provision of parks, green spaces, woodlands, habitats, the coast, rivers and canals (green and blue infrastructure).

- Making sure we have better integration of Green Infrastructure into development.
- The protection, conservation and enhancement of the natural assets of the LCR should be a key focus within the SDS and it should advocate net gain for biodiversity (or even more progressively for natural capital).
- Identify open space assets and habitats of sub-regional value that should be protected / enhanced / managed.
- Put in place infrastructure (including green and blue) to help limit negative impacts from extreme weather.
- Making space for water - this is a vital and increasingly important part of sustainable water management on a catchment scale.
- The City Region should adopt an ambitious tree planting target and identify land for tree planting. Increasing tree cover and green spaces to capture more carbon naturally.
- The LCR is well-placed to tackle the climate and biodiversity emergencies and move this forward at pace because of existing collaborations, partnerships and evidence.
- Work collaboratively to deliver natural capital investment and opportunities in LCR and adopt the Natural Capital Baseline as spatial evidence base.

5. How we could respond?

5.1. Based on the above considerations and feedback we have received, a suggested strategic policy approach to cover this subject is set out below.

To plan strategically for the natural environment and Green Infrastructure, taking account of climate change, we suggest a policy approach that would:

- Seek to ensure that Green Infrastructure is planned, designed and managed in an integrated way to achieve multiple benefits.
- Embed the 'natural capital approach' into plan and decision making, securing lasting benefits offered by the natural environment. This would utilise the LCR Natural Capital Baseline to prioritise and identify strategic opportunities for Green Infrastructure and habitat provision or improvement, and act as a consistent measure for achieving environmental net gain from new development.

- Support and identify opportunities for strategic tree planting and woodland creation in the City Region and ensure its lasting management.
- Reinforce the protection of the LCR's network of green and open spaces and promote its improvement, ensuring new provision is accessible to communities and is of a high standard with lasting management in place.
- Reinforce the protection of the LCR's sites of biodiversity and geodiversity value and promote their conservation and enhancement.

It would also:

- Set out a strategic approach to water management, flooding and flood risk informed by updated strategic level flood risk information for the City Region.

5.2. We welcome your views on this. Comments received will help us in drafting a policy. We will review and refine this suggested policy approach in response to any further details that emerge following the Planning White Paper and as we develop our evidence base.

6. Which Objectives will this approach help to achieve?

6.1. The suggested policy approach will help achieve the following SDS objectives:



Tackling Climate Change and creating a greener City Region



Delivering an Inclusive Economy



Addressing health inequalities and creating a healthier City Region



Embedding Social Value in all aspects of development

7. How can we make sure this approach would work?

7.1. Suggested ways and resources could include:

- LCR Natural Capital Baseline to plan, measure and monitor environmental improvements.
- Utilising [digital tools](#) (e.g. [SCATTER](#), [Climate Just](#)) to plan, measure and monitor climate mitigation / adaptation improvements.
- Utilising the [LCR Ecological Network](#) evidence base (Merseyside Environmental Advisory Service) on habitats / biodiversity.
- Mapping and monitoring accessibility to open and green space.
- Measuring and monitoring tree cover and levels of carbon sequestration.
- Evidence and data on flood risk and coastal management (multiple sources including Environment Agency) plus any updated strategic flood risk assessment for LCR.

Active Travel – Our Considerations

1. Issues and Opportunities

- 1.1. [Public Health England](#) notes that taking physical activity is key to reducing poor health. In addition, there is growing recognition in government policy and guidance regarding the role the environment can have in helping people keep active, encouraging walking and cycling, and in designing beautiful places. This is sometimes referred to as ‘active travel’ and has a number of benefits wider than increasing physical activity, including its role in reducing vehicular emissions and contributing towards climate change goals. The concept of ‘active travel’ is summarised in section 2 below.
- 1.2. On the whole, the City Region performs poorly in terms of physical activity compared to the national average. Currently, 64.6% of adults in the City Region are physically active compared to the English average of 67.2%¹, and 62% agree that more cycling would make the City Region a better place to live and work². In addition, data indicates that residents of Knowsley and Wirral are less likely to walk than the national average, and that residents of Knowsley are less likely to regularly cycle compared to the national average³. Furthermore, motor vehicle and car use has increased over the last two decades and continues to rise⁴.
- 1.3. The City Region also faces a weight problem whereby almost every district has an obesity or overweight rate above the national average. In some areas obesity levels measured in year 6 children are as high as 30%⁵. Every district within the Liverpool City Region (except Sefton) between 2015/16 and 2017/18 had a higher obesity rate amongst children aged 10-11 than the national average⁶ (see Figure 2).

¹ LCRCA Evidence Research & Intelligence.

² (Sustrans BikeLike Project LCR, 2019), https://www.sustrans.org.uk/media/5952/bikelife19_liverpool_web_updated.pdf

³ LCRCA Evidence Research & Intelligence.

⁴ LCRCA Evidence Research & Intelligence.

⁵ LCRCA Evidence Research & Intelligence.

⁶ LCRCA Evidence Research & Intelligence.

Prevalence of Obesity Among Year 6 Children (Aged 10-11) by Middle Super Output Area (MSOA), 2015/16 – 2017/18

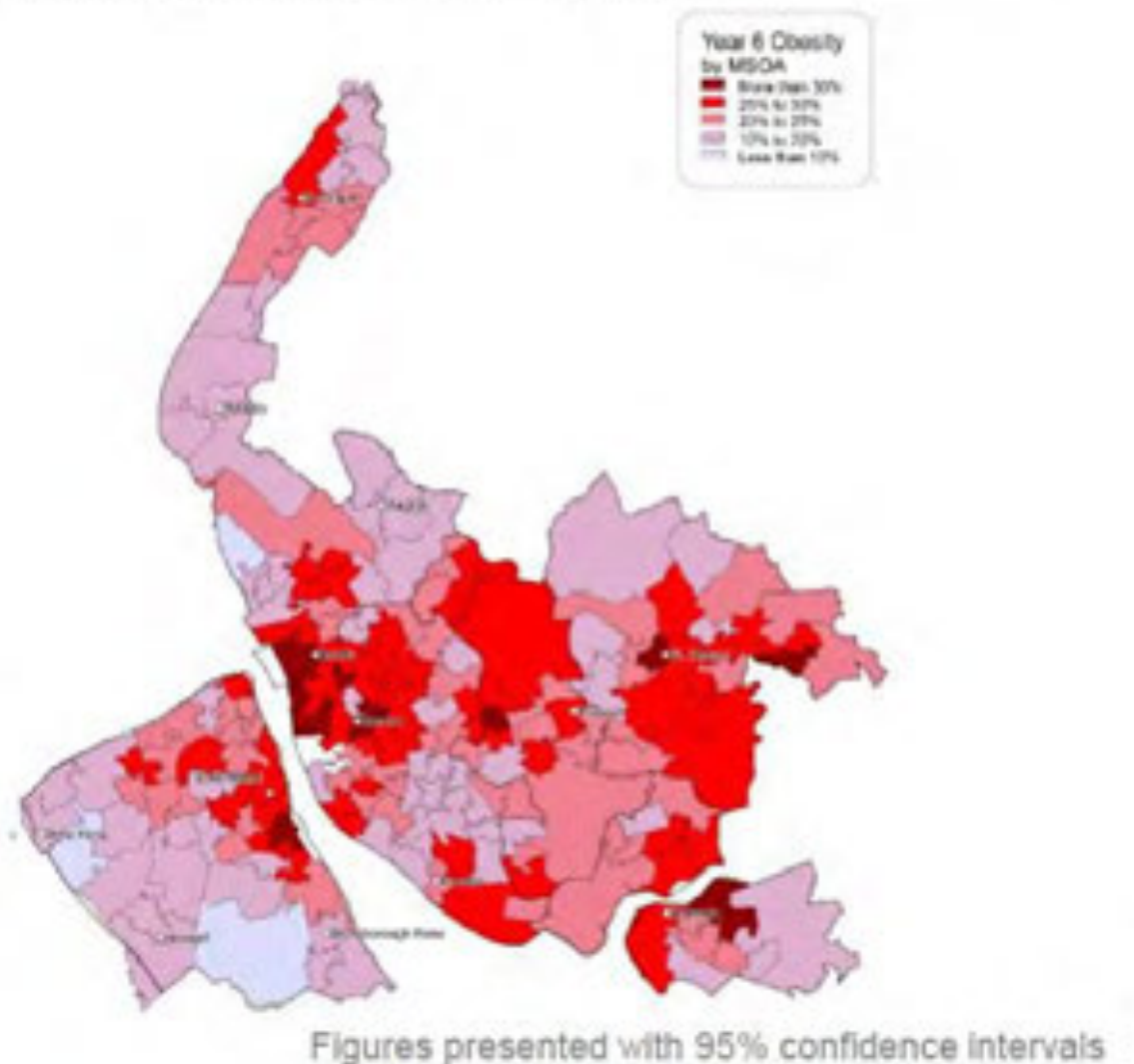


Figure 1. Liverpool City Region Prevalence of Obesity Among Year 6 Children.

2. Why does the Spatial Development Strategy need to address this?

2.1. The role the environment can have in achieving healthy places is set out in a number of Government publications. Of particular relevance the [National Planning Policy Framework](#) sets out that planning policies should aim to achieve healthy, inclusive and safe places which include layouts that encourage walking and cycling, and should provide for high quality networks for walking and cycling. In addition, the [Manual for Streets](#) seeks to assign a higher priority to pedestrians and cyclists by setting an approach to residential streets that works for all members of the community.

- 2.2. The [Building Better Beautiful Commission](#) also recognise the importance of walking, noting ‘a beautiful place is a place in which people wish to walk, rather than a place that the car helps them to avoid’. Movement is also one of ten characteristics identified in the [National Design Guide](#) that make a well-designed place and determines the success of development. Amongst other street features, the Design Guide identifies that a well-designed movement network defines a clear pattern of streets that; is safe and accessible for all; limits the impacts of car use by prioritising and encouraging walking, cycling and public transport; and promotes activity and social interaction, contributing to health, well-being, accessibility and inclusion. Furthermore [Sport England’s Active Design Guide](#) recognises that the design of where we live and work can play a vital role in keeping active, and identifies 10 principles to inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces to promote sport and active lifestyles.
- 2.3. In light of the above and the statutory duty to ensure that the SDS addresses health and health inequalities, there is a compelling case to consider a policy approach that supports active travel across the City Region. The need to increase physical activity across the City Region is particularly important in the context of the Government’s [Obesity Strategy](#) which highlights the link between obesity and the risk of becoming ill and dying from COVID-19.

3. What is being done by the Combined Authority?

- 3.1. As part of his Manifesto, the Metro Mayor proposes to tackle health issues in the City Region by:
- Integrating public health to encourage healthy and active lifestyles by promoting sport, walking and cycling, and delivering a strategy to make these sustainable and more healthy forms of transport safer and more attractive to all;
 - Delivering joined-up initiatives with local authorities and NHS Trusts that encourage healthy and active lifestyles across the City Region as part of an integrated public health strategy.
- 3.2. The City Region already has a number of initiatives and strategies that support active travel including the [Liverpool City Region Combined Authority Cycling and Walking Infrastructure Plan](#) and the [Liverpool City Region Combined Authority](#)

[Local Journeys Strategy](#). The strategies promote and set investment priorities for region-wide active travel, and should challenge a number of health, climate and economic issues including physical inactivity, lack of access to local services, reducing levels of greenhouse gas emissions, and improving the air quality of our city region communities.

- 3.3. Of particular relevance, developing a mobility system that enhances health and wellbeing and boosting healthy forms of travel for short trips form part of strategic objectives identified in the [Liverpool City Region Combined Authority Transport Plan](#). The importance of quality of place and placemaking is also recognised by being a priority action in the Transport Plan. This action sets out that plans, policies and programmes will be used to create high quality environments that encourage active travel, and which make walking, cycling and public transport more attractive, more convenient, and safer for all. An ambition to develop a Key Route Network for walking and cycling journeys is also identified as an ambition in the Transport Plan. In addition, as part of a series of actions to address poor air quality, the [Interim Air Quality Action Plan](#) seeks to boost active travel. A [people-powered future](#) is also envisaged for the City Region, which will enable people to get out of their cars and walk and cycle more.

4. What you told us

- 4.1. Of relevance to the topic of active travel, responses to our previous SDS public engagement highlighted:

- That health matters and that more could be done across the City Region to improve it.
- That roads and walkways should feel safer so people feel more confident to cycle or walk to work or to town centres.
- Poor connectivity for active travel is a major challenge.
- Better design of active travel routes and improved public realm could encourage uptake in walking or cycling.

5. How we could respond

5.1. We consider that a policy which embeds active travel into the design of new development could play an important role in addressing poor health and health inequalities across the City Region. We suggest a policy approach whereby:

New development would prioritise street design, and the creation of a good quality attractive and safe public areas that promote active travel (e.g. cycling and walking). Open spaces that encourages sport and active lifestyles would also be prioritised. Where possible, proposals would be required to connect to the City Region's walking and cycling network and green infrastructure.

5.2. We note that the Government's [Planning White Paper](#) envisages a move towards a map and rule based approach as opposed to vague statements of policy. The White Paper also sets out that a National Design Code will be published in due course. Once further details emerge regarding the White Paper and the National Design Code, we will review the above suggested policy approach. Should the White Paper proposals be enacted, we envisage that any subsequent design rules in the City Region for new development could have a strong emphasis on active travel. However, at this stage we are seeking views on the general principle of embedding active travel into the design of development. For clarity, green infrastructure is defined by the NPPF as 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. In addition, a map of the strategic cycling and walking network can be found on page 27 [here](#).

6. Which Objectives will this approach help to achieve?



Addressing health inequalities and creating a healthier City Region



Tackling Climate Change and creating a greener City Region



Creating high quality buildings and places that allow our communities to flourish



Delivering an Inclusive Economy



Embedding Social Value in all aspects of development

7. How can we make sure this approach would work?

7.1. We would monitor whether the suggested policy approach works around the following indicators:

- Obesity levels of children in year 6 and adults;
- Uptake of walking and cycling across LCR;
- Levels of physical activity; and
- Air quality in certain areas across the LCR.

Health & Wellbeing

Air Quality - Our Considerations

1. Issues and opportunities

- 1.1. Air pollution contributed to almost 1 in 20 deaths in Liverpool City Region, equivalent to around 1,040 deaths per year in 2018¹. This figure is higher than the North West average, but is slightly below that of England (which includes London). Nearly two thirds of the local authorities within Liverpool City Region have roadside levels of nitrogen dioxide (NO₂) that breach legal limits, whilst all six of the districts have at least one area with levels of particulate matter (PM_{2.5}) over the level recommended by the World Health Organization (WHO)². Higher concentrations of nitrogen oxides, which can cause lung irritation and can lower resistance to respiratory infections and illness, tend to be found around major roads and urban centres within the City Region³. This is reflected in Figure 1, which shows the average amount of nitrogen dioxide across the City Region in 2018.
- 1.2. Poor air quality costs the Liverpool City Region an average of £480 million per year⁴ by way of absence from work, reduced productivity and direct costs to the NHS.
- 1.3. There is international academic consensus that air pollution is bad for human health. In addition, the UK has reduction commitments for five damaging air pollutants which comprise fine particulate matters, ammonia, nitrogen oxide, sulphur dioxide and non-methane volatile organic compounds, noted for their harm to public health, habitats, biodiversity and the environment⁵.
- 1.4. Locally, Liverpool City Region Combined Authority has declared a Climate Emergency and identified that addressing poor air quality is a necessary component of its response.

¹ British Lung Foundation and Kings College London, 'The health and economic impacts of toxic air in Liverpool City Region', January 2020.

² Defra (2018) Modelled background pollution data. <https://uk-air.defra.gov.uk/data/pcm-data>.

³ LCRA Evidence Research & Intelligence.

⁴ Royal College of Physicians and Royal College of Paediatrics and Child Health, Every breath we take, February 2016, p.xiii.

⁵ Planning Practice Guidance, reference ID: 32-001-20191101.

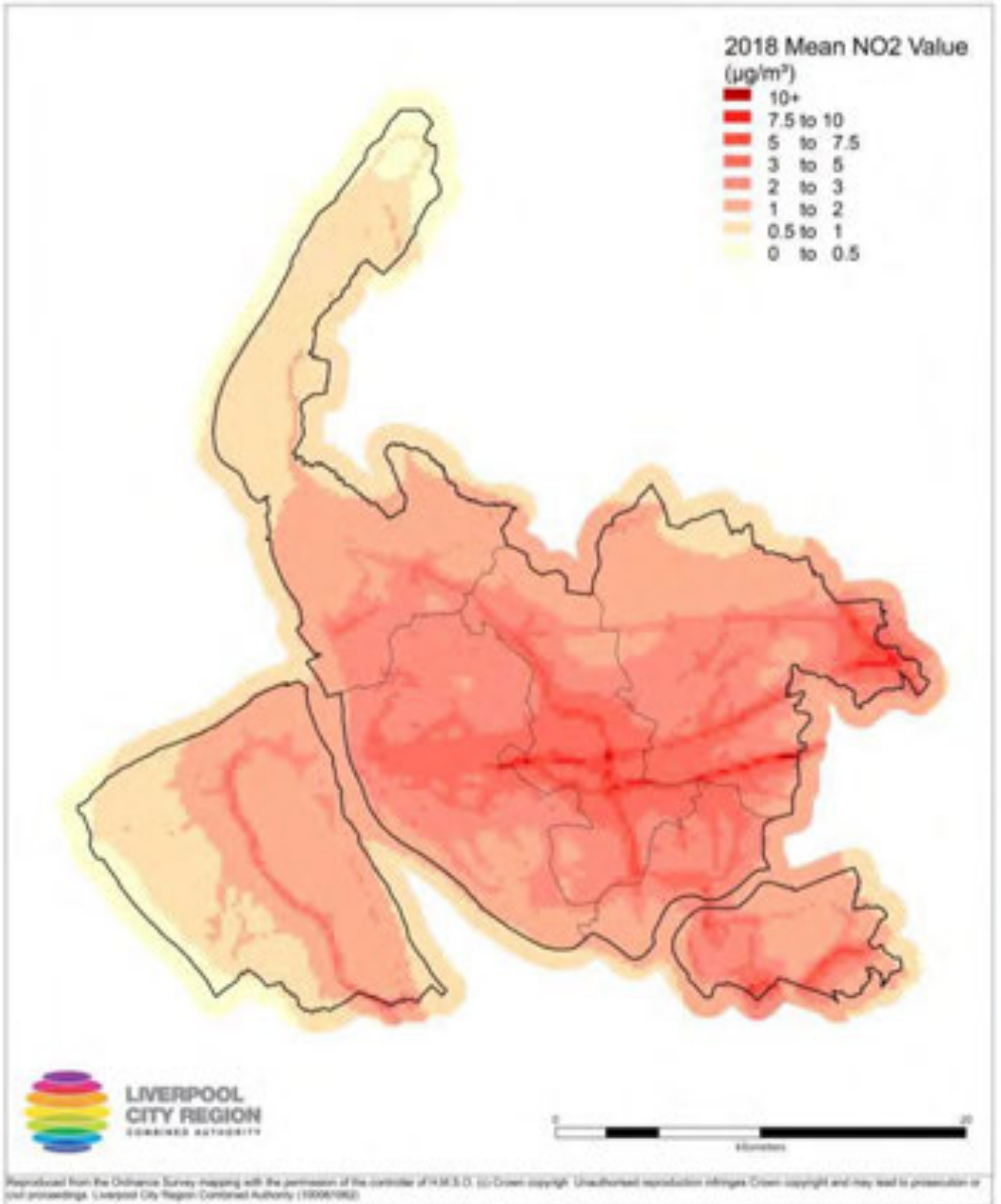


Figure 1. Liverpool City Region Average Nitrogen Levels

- 1.5. Poor air quality particularly impacts deprived areas in the City Region. This has consequences for equality and fairness in the City Region, with high rates of car usage in more affluent areas contributing towards significant air quality challenges in the less affluent areas through which the bulk of this traffic flows⁶. Compounding this is that greenspace and natural capital, which could help improve air quality, is less prevalent in areas of the City Region that need them the most⁷. Furthermore, motor vehicle and car usage has increased in the City region over the last two decades and continues to rise⁸.
- 1.6. The City Region also has a number of declared [Air Quality Management Areas](#) (AQMA – areas that national air quality objectives are not likely to be achieved) which are identified in Figure 2.

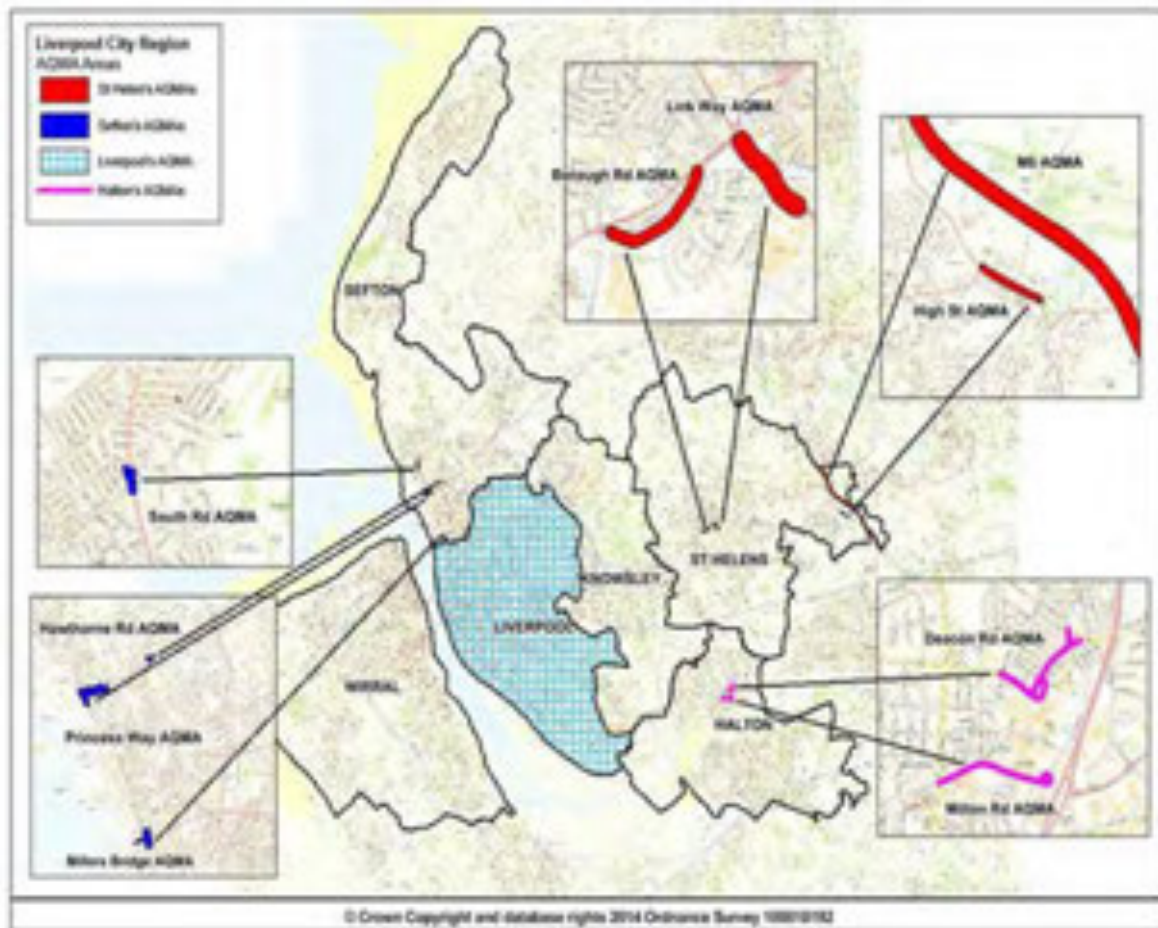


Figure 2. Liverpool City Region AQMA

⁶ Liverpool City Region Combined Authority Transport Plan.

⁷ LCRCA Evidence Research & Intelligence.

⁸ LCRCA Evidence Research & Intelligence.

2. Why does the Spatial Development Strategy need to address this?

- 2.1. The SDS has a statutory duty to address health and health inequalities in the Liverpool City Region. Addressing poor air quality will be a key component of achieving this.
- 2.2. The [National Planning Policy Framework](#) also recognises the importance of addressing poor air quality, and sets out that planning policy should:
 - Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account AQMAs and Clean Air Zones, and the cumulative impacts from individual sites in local areas;
 - Identify opportunities to improve air quality or mitigate impacts, such as through traffic and travel management and green infrastructure so far as possible opportunities can be considered at the plan making stage;
 - Ensure that new and existing developments do not contribute to, or are put at risk of unacceptable levels of air pollution and wherever possible development helps improve air quality; and
 - Manage patterns of growth and focus on significant development on sustainable locations to reduce congestion and emissions, improve air quality and public health.
- 2.3. [Planning Practice Guidance](#) sets out what specific issues may need to be considered when assessing air quality impacts, how detailed air quality assessments need to be, and how an impact on air quality can be mitigated.

3. What is being done by the Combined Authority?

- 3.1. Poor air quality is recognised in the Metro Mayor's Manifesto which seeks to tackle this by:
 - Creating an affordable, reliable and integrated transport network;
 - Promoting low carbon technologies and industries in the green economy sector.
- 3.2. The Combined Authority have created an Air Quality Task Force to improve air quality in the City Region. A recent output of the task force has been an Interim Air Quality Action Plan, which makes a number of recommendations, some of which will

inform the SDS, such as using better data to support decision-making, boosting active travel, promoting clean fuels and technologies, reducing Strategic Road Network emissions, using public transport, tackling domestic emissions, reducing freight emissions, providing green infrastructure and pollution mitigation (including greening development and investigation into air quality barriers) and cleaner, greener national and inter-city connectivity. Specifically, the Action Plan also sets out that the Combined Authority will ensure air quality is not considered in isolation when developing plans and projects, and that local planning powers should be used to create clean, liveable and safe places.

3.3. The Combined Authority [Transport Plan](#) is also relevant to air quality, and sets a strategic objective to develop a mobility system that enhances health and wellbeing and developing a liveable and resilient City Region that addresses the challenges of poor air quality. A number of priority actions related to this strategic objective are set throughout the Transport Plan. The recently published [Building Back Better Recovery Plan](#) has reaffirmed the Combined Authority's commitment to addressing poor air quality by proposing investment into hydrogen buses and a hydrogen refuelling station to introduce a green route service that would pass through several AQMAs.

4. What you told us

4.1. Of relevance to air quality, responses to the previous SDS engagement highlighted that:

- Tackling poor air quality is a major issue for residents across the City Region.
- Congestion as a result of heavy traffic and pollution caused by harmful greenhouse gas emissions is acknowledged as contributing to poor air quality.
- There are some opportunities to improve poor air quality such as via electric vehicles and charging points and promoting public transport use rather than using the private car.
- Air quality monitoring would help tackle poor air quality in the City Region.

5. How we could respond?

5.1. Tackling air quality will require more than one SDS policy and interventions that are outside the remit of the planning system. In addition, the Government's White Paper [Planning for the Future](#) envisages a move towards a map and rule based approach as opposed to vague statements of policy. Nonetheless the SDS will seek to ensure that new development is located in sustainable locations to maximise sustainable forms of transport and minimise the need to travel by private vehicle. Other SDS policies suggested as part of this consultation (such as those relating to housing standards, design quality, green infrastructure, and active travel) will also play a key role in addressing poor air quality. As the SDS would be read as a whole, it would not be necessary to repeat these requirements within an air quality policy. However, ensuring that individual development accounts for, and where necessary appropriately mitigates poor air quality, would be make an important contribution to addressing poor air quality.

5.2. As such we suggest that the SDS should include an air quality policy that would:

Set out what locations and types and sizes of development would be required to undertake an Air Quality Impact Assessment.

Where the evidence indicates it is necessary, it would be required that the development delivers appropriate mitigation measures to monitor and address air pollution through design and throughout construction.

5.3. We envisage that the above requirements would be particularly pertinent in AQMAs or locations that could affect them, for defined sensitive uses and users (such as schools), or within areas where the evidence indicates that there are health problems associated with poor air quality. The suggested approach would apply to development proposals that are sources of pollutions and/or include receptors to poor air quality. We will continue to develop our evidence base on air quality and give further consideration to what locations, types and sizes of development any Air Quality Assessment requirement could apply.

5.4. This suggested policy, in conjunction with the other noted strategies, will form part of a comprehensive package to improve air quality. It would also support the Combined Authority's objective to support decision-making with better data, and

the data driven approach articulated by the Government in the Planning White Paper.

6. Which Objectives will this approach help to achieve?

6.1. The suggested policy approach will help support the following SDS objectives:



Addressing health inequalities and creating a healthier City Region



Tackling Climate Change and creating a greener City Region



Delivering an Inclusive Economy

7. How can we make sure this approach would work?

7.1. The following data sets could be used to monitor the effectiveness of the suggested policy:

- Emissions data (NO₂, PM, sulphur dioxide etc).
- Relevant health data relating to air quality (though this is long term and the day-to-day impacts in the short term are negligible).
- The proportion of mitigation measures identified in air quality impact assessments that are implemented.

Health Impact Assessments – Our Considerations

1. Issues and Opportunities

- 1.1. The World Health Organisation define a Health Impact Assessment (HIA) as ‘a practical approach used to judge the potential health effects of a policy, programme or project on a population, particularly on vulnerable or disadvantaged groups. Recommendations are produced for decision-makers and stakeholders, with the aim of maximising the proposal's positive health effects and minimising its negative health effects.’ The Combined Authority acknowledge the role HIAs can play in understanding health implication, and the SDS will be subject to a HIA via the Integrated Impact Assessment.
- 1.2. Liverpool City Region has an estimated population of just over 1.5 million of which 19% are aged 65 or over, higher than the national average of 18.4%¹. The Government’s 2019 English Indices of Deprivation show that almost a third of the City Region’s neighbourhoods are within the top 10% most deprived in England. As such the City Region is significantly more deprived than the national average. Furthermore, based on these indices, almost half of the City Region’s neighbourhoods are within the top 10% most health deprived within England, with areas of high health deprivation tending to be those also affected by high levels of multiple deprivation. Figure 3 shows Liverpool City Region LSOA by deprivation decile in terms of health and disability (2019).
- 1.3. Healthy life expectancy at birth is [defined](#) by Public Health England as the estimate of the average number of years that babies born in a given time period will live in a state of ‘good’ general health. This is dependent on average mortality levels at each age, and the level of good health at each age, remaining constant in the future. Within most areas of Liverpool City Region healthy life expectancy is below the national average for males and females and is particularly low within areas impacted by high levels of deprivation².
- 1.4. In 2017, the prevalence of common mental health disorders is at or above national levels across the six boroughs of the City Region, whilst during 2017/18 severe mental health disorders are more prevalent within the City Region than nationally³.

¹ LCRC Evidence Research & Intelligence.

² LCRC Evidence Research & Intelligence.

³ LCRC Evidence Research & Intelligence.

City Region school pupils are more likely to have social, emotional and mental health needs compared to the national and regional average, and young people are more likely to be admitted to hospital because of a mental health disorder⁴.

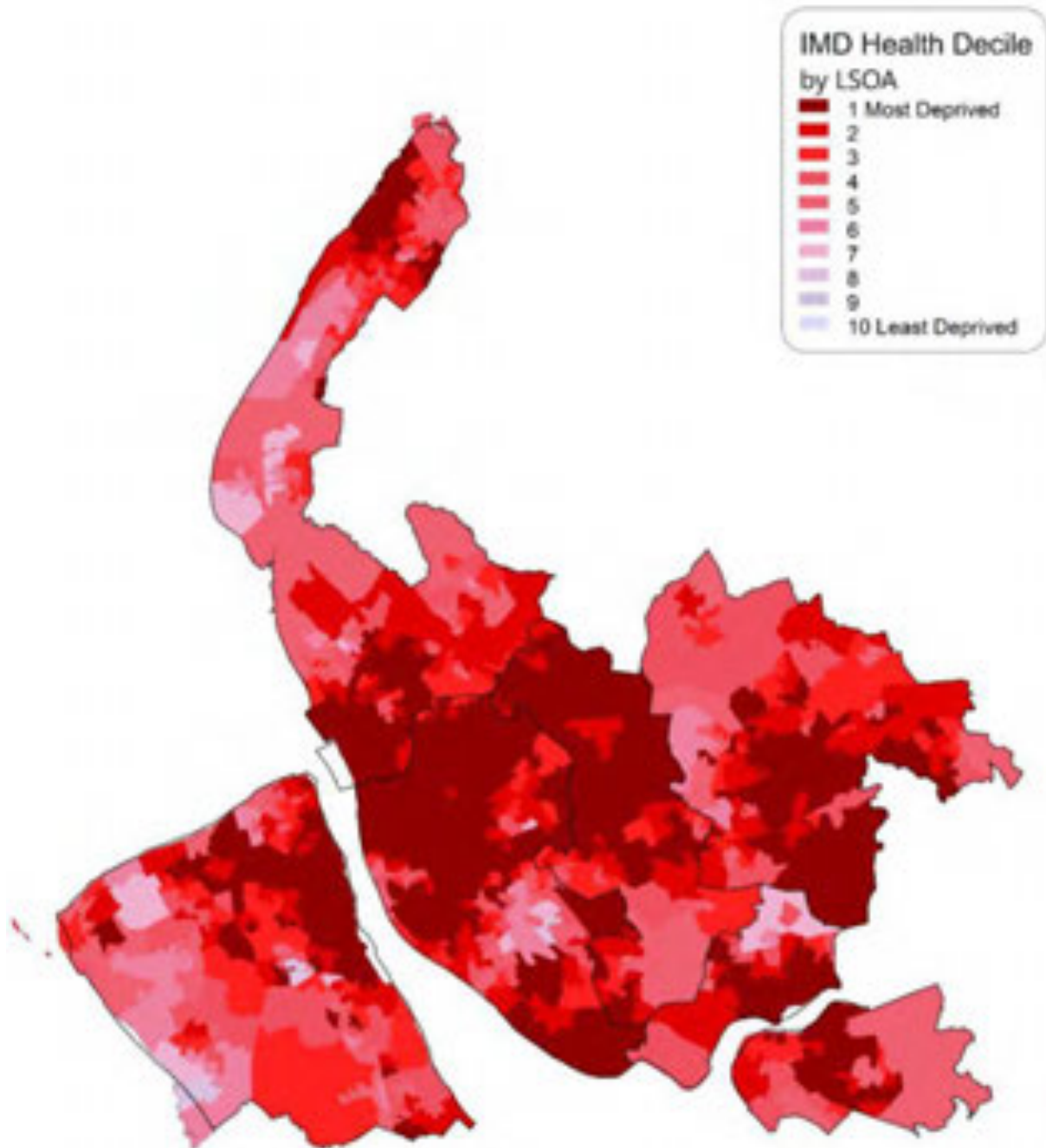


Figure 1. Liverpool City Region IMD Health Decile by LSOA.

⁴ LCRA Evidence Research & Intelligence.

2. Why does the Spatial Development Strategy need to address this?

- 2.1. The SDS has a statutory duty to address health and health inequalities.
- 2.2. The importance of health in achieving sustainable development and the promotion of healthy lifestyles and healthy living are recognised in the [National Planning Policy Framework](#) (NPPF). Of relevance, the NPPF sets out that planning policies should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles; especially where this would address identified local health and well-being needs. Examples of this include the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- 2.3. [National Planning Policy Guidance](#) recognises Health Impact Assessments (HIA) as a useful tool to use where there are expected to be significant impacts associated with a planning application. HIAs have also been identified by public health organisations such as the [World Health Organisation](#) as playing a vital role in raising awareness, promoting public participation, and placing health on the agenda of all development sectors. Three forms of HIA exist which are: desk based HIA, a rapid HIA or a comprehensive HIA, ranging from 2 to 6 weeks up to 6 months for an in-depth assessment of potential health impacts. As set out here, a 'desk-top' appraisal is generally undertaken by an organisation's own officers, a 'rapid appraisal' generally uses existing information and involves workshop/stakeholder participation, whilst a 'comprehensive HIA' involves the collection of new data and greater participation.

3. What is being done by the Combined Authority?

- 3.1. Health forms part of the Metro Mayor's Manifesto, wherein he identifies that he will tackle City Region health issues by:
 - Integrating public health to encourage healthy and active lifestyles by promoting sport, walking and cycling, and delivering a strategy to make these sustainable and more healthy forms of transport safer and more attractive to all;
 - Delivering joined-up initiatives with local authorities and NHS Trusts that encourage healthy and active lifestyles across the City Region as part of an integrated public health strategy.

- Being an advocate for people impacted by poor mental health and dementia, tackling the stigma and championing the services they need.

3.2. The Combined Authority have also produced a number of plans and strategies to help improve health and address health inequalities across the City Region. The City Region already has a number of initiatives and strategies that support active travel including the [Liverpool City Region Combined Authority Cycling and Walking Infrastructure Plan](#) and the [Liverpool City Region Combined Authority Local Journeys Strategy](#), both of which will help increase physical activity and reduce use of vehicular transport, with associated reductions in emissions. The Combined Authority have also created an Air Quality Task Force to improve air quality in the City Region. A recent output of the task force has been an [Interim Air Quality Action Plan](#), which makes a number of recommendations, some of which will inform the SDS. The Combined Authority [Transport Plan](#) is also relevant to air quality, and sets a strategic objective to develop a mobility system that enhances health and wellbeing and developing a liveable and resilient City Region that addresses the challenges of poor air quality.

3.3. Of relevance to skills, a [Health and Care Growth Action Plan](#) has also been produced by the Combined Authority. Based on the critical mass of scientific assets within the City Region, open health innovation is recognised as a transformational opportunity in the [draft Local Industrial Strategy](#). In addition, a HIA has been incorporated in the Integrated Impact Assessment⁵ of the SDS which would help address health and health inequalities in a holistic and overarching way that complements existing City Region plans and strategies.

4. What you told us

4.1. Of relevance to health and health inequalities, responses to our previous SDS engagement highlighted:

- Health is important and that more could be done across the City Region to improve it.

⁵ AECOM (2020) 'IIA Scoping Report':

- There is recognition that the built environment can help tackle poor health outcomes.
- HIAs should be incorporated into planning frameworks.

5. How we could respond

5.1. We consider that requiring specified types of development proposals to be accompanied by a HIA could be an effective way of helping address health and health inequalities in the City Region. In addition, we consider that there could be a role for HIAs in local plan making in the City Region, and we intend to include a HIA in the Spatial Development Strategy Integrated Impact Assessment. The suggested SDS policy is set out below:

Specified planning applications and development plans made in the City Region would need to be accompanied and informed by Health Impact Assessments.

5.2. The suggested policy approach would require collaborative working between planning and public health teams. In addition we note that the Government's White Paper [Planning for the Future](#) envisages a move towards a map and rule based approach as opposed to vague statements of policy. The White Paper also proposes that major development would be accompanied by one key standardised planning statement of no more than 50 pages to justify it against local and national policy. As such we will be considering how a concise and more focussed form of HIA that remains effective could be achieved.

6. Which Objectives will this approach help to achieve?



Addressing health inequalities and creating a healthier City Region



Creating high quality buildings and places that allow our communities to flourish



Embedding Social Value in all aspects of development

7. How can we make sure this approach would work?

7.1. The following data sets could be used to monitor the effectiveness of the

- Number of applications with HIAs submitted – either desk-based, rapid or comprehensive.
- Qualitative review of the impact HIAs have on development proposals.
- Health indices of deprivation and outcomes.

Healthy Food Businesses – Our Considerations

1. Issues and Opportunities

- 1.1. Public Health England has [set out](#), that whilst not all fast food is unhealthy, it is typically high in saturated fat, salt and calories, with excess calorie consumption a root cause of the obesity crisis. In addition, [National Planning Policy Guidance](#) (PPG) notes that planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. In light of this and the wider context set out below, we are considering what role the SDS could have in supporting healthy food businesses across the City Region.
- 1.2. The Government's 2019 English Indices of Deprivation show that almost a third of the City Region's neighbourhoods are within the top 10% most deprived in England. As such the City Region is significantly more deprived than the national average. Furthermore, almost half of the City Region's neighbourhoods are within the top 10% most health deprived within England, with areas of high health deprivation tending to be those also affected by high levels of multiple deprivation. The City Region also faces an obesity problem whereby almost every district has an obesity rate above the national average for children in year 6 as shown in Figure 4¹.
- 1.3. Compounding this, two thirds of schools and colleges in the City Region are within 400 metres of a takeaway², which is considered to be the distance most young adults are willing to walk. Furthermore there are areas in the City Region that have a large number of takeaways and no supermarkets, with a number of 'food deserts' identified by a [Kellogg's Report \(2018\)](#). 'Food deserts' are defined as areas which are poorly served by food stores, especially stores that sell fresh, healthy products at affordable prices. Living in a food desert can sometimes be more challenging for those on low incomes, or vulnerable individuals which may limit their ability to travel to stores that are further afield. The Kellogg's Report found that some areas in Sefton, Liverpool, Halton and Knowsley are among the top ten most deprived food deserts in England.

¹ LCRC Evidence Research & Intelligence.

² LCRC Evidence Research & Intelligence.

Prevalence of Obesity Among Year 6 Children (Aged 10-11) by Middle Super Output Area (MSOA), 2015/16 – 2017/18

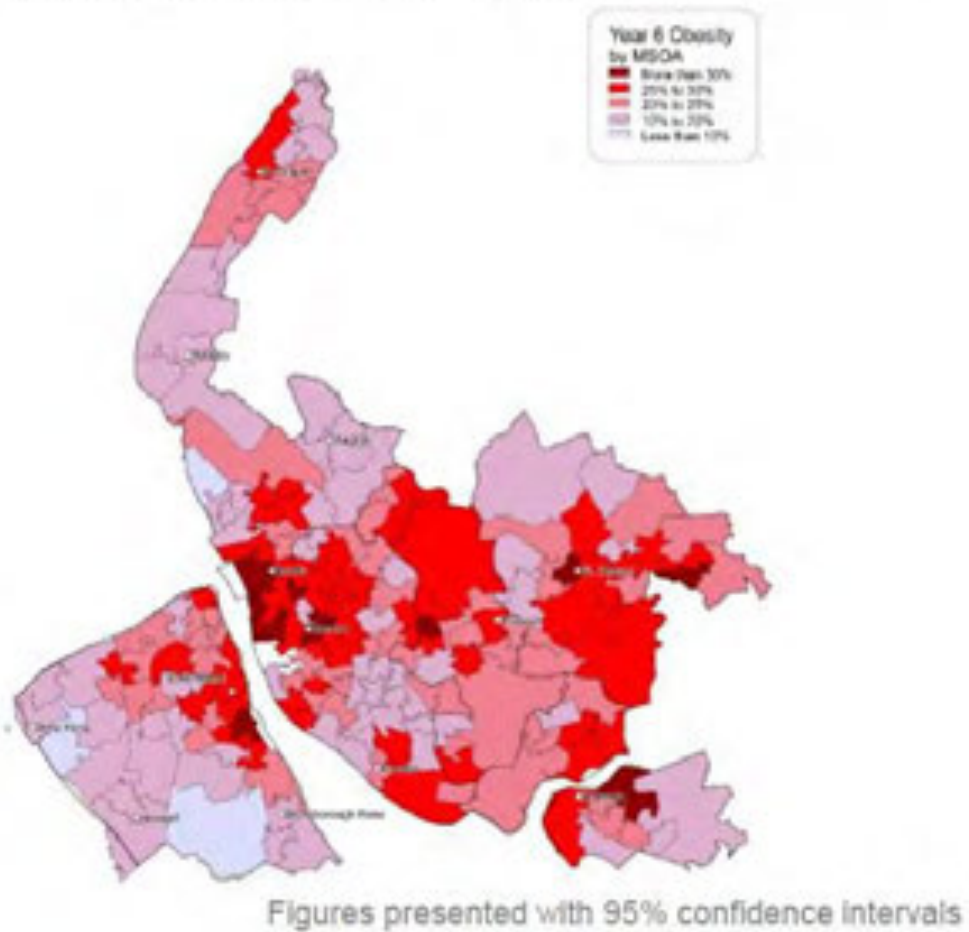


Figure 1. Prevalence of Obesity Among Year 6 Children.

2. Why does the Spatial Development Strategy need to address this?

21. The importance of health in achieving sustainable development and the promotion of healthy lifestyles and healthy living are recognised in the [National Planning Policy Framework](#) (NPPF). Of relevance, the NPPF sets out that planning policies should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles; especially where this would address identified local health and well-being needs. Examples of this include the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
22. As set out above, the PPG notes that planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Where

justified, it goes onto say planning policies can seek to limit the proliferation of particular uses where evidence demonstrates that this is appropriate and where such uses require planning permission. Issues that such a policy would need to have regard to cited in the PPG includes proximity to locations where children and young people congregate, evidence indicating high levels of obesity, deprivation, health inequalities and general poor health in specific locations, and over-concentration of certain uses within a specified area.

23. Guidance produced by [Public Health England](#) demonstrates that the planning system can be used to support individuals and local communities in maintaining and achieving a healthy weight. They identified that one way to maintain a healthy weight can be achieved by encouraging access to healthier food and drink options through the local food environment.
24. As hot food takeaways do not fall into use classes E (Commercial, Business and Service) and F (Including learning and non-residential institutions and local community) in recent changes to the planning use class order, planning permission would not be required to change between these land uses. As such the SDS could potentially influence the development of hot food takeaways in the City Region.
25. The Government as part of its recently published [Obesity Strategy](#) have highlighted the link between obesity and the risk of becoming ill and dying from COVID-19. Whilst it cannot be assumed all takeaway food is unhealthy, the Obesity Strategy cites evidence that on average the portions of food or drink that people eat out or eat as takeaway meals contain twice as many calories as their equivalent bought in a shop. In response, the Government propose that customers are given the right information to make healthier choices, as well as changes to food deals and the way food is marketed to children.

3. What is being done by the Combined Authority?

- 3.1. The SDS has a statutory duty to address health and health inequalities.
- 3.2. Health forms part of the Metro Mayor's Manifesto, wherein he identifies that he will tackle City Region health issues by:

- Integrating public health to encourage healthy and active lifestyles by promoting sport, walking and cycling, and delivering a strategy to make these sustainable and more healthy forms of transport safer and more attractive to all;
 - Delivering joined-up initiatives with local authorities and NHS Trusts that encourage healthy and active lifestyles across the City Region as part of an integrated public health strategy.
33. The City Region already has a number of initiatives and strategies that support active travel including the [Liverpool City Region Combined Authority Cycling and Walking Infrastructure Plan](#) and the [Liverpool City Region Combined Authority Local Journeys Strategy](#). The strategies promote and set investment priorities for region-wide active travel, and should challenge a number of health, climate and economic issues including physical inactivity, lack of access to local services, reducing levels of greenhouse gas emissions, and improving the air quality of our city region communities.
34. The Combined Authority already has a number of initiatives and strategies that will help address obesity through supporting active travel including the [Liverpool City Region Combined Authority Cycling and Walking Infrastructure Plan](#) and the [Liverpool City Region Combined Authority Local Journeys Strategy](#). Of relevance to skills, a [Health and Care Growth Action Plan](#) has also been produced by the Combined Authority

4. What you told us

- 4.1. Of relevance to this topic area, responses to our previous SDS public engagement highlighted that many felt that the location of hot food takeaways and other unhealthy uses were too close to schools and often caused anti-social behaviour, and even obesity in some cases.

5. How we could respond

- 5.1. To complement other SDS policies suggested as part of this engagement and the Government's proposals in the Obesity Strategy, we are considering including a policy in the SDS to manage the location of hot food takeaways.

52. The proliferation of unhealthy outlets such as hot food takeaways have typically been restricted on the basis of prioritising retail shops (previously defined as use class A1) and on grounds of impacts on neighbouring living conditions and litter. However, managing hot food takeaways against health-based planning criteria is being used more in adopted development plans. Our suggested approach to tackling obesity levels across young people would be:

To restrict new hot food takeaways in locations where obesity levels are high or near where children and young people congregate, such as schools, community centres and playgrounds.

53. The suggested policy approach would seek to promote healthy places by restricting the proliferation of unhealthy outlets and would include greater detail on how its criteria would apply. An example of one approach could be restricting hot food takeaways where schools, and other places young people congregate are located within 400m³.
54. We are also considering how we could measure and define when an area becomes over concentrated with hot food takeaways, and how the suggested policy could manage new hot food takeaways in such circumstances. We also note that the Government's White Paper [Planning for the Future](#) envisages a move towards a map and rule based approach as opposed to vague statements of policy, and proposes growth, renewal and protection areas. In this context we will be considering how this policy could also define and positively support the delivery of healthy food businesses, particularly in deprived areas.
55. In suggesting the above policy approach, we recognise that hot food takeaways encompass a variety of food types. However, controlling what specific types of hot food are served to customers at takeaways lies beyond the control of the planning system. In addition, whilst planning rules have been relaxed so that [pubs and restaurants can operate as hot food takeaways](#) in response to COVID-19, this will only apply for a 12 month period. We also consider that the suggested approach set out above could still have a positive impact on addressing obesity, despite the availability of delivery services provided in the sector. As the suggested policy approach would only apply in certain circumstances, our initial view is that it is not

³ Public Health England (2020), Using the planning system to promote healthy weights environments.

likely to unduly restrict businesses. We will however be further developing our evidence base around the suggested policy approach.

- 5.6. The suggested policy approach, alongside other suggested policy approaches in the SDS and other obesity and health strategies outside of the planning system, would help address health and health inequalities across the City Region.

6. Which Objectives will this approach help to achieve?

- 6.1. The suggested policy approach will help support the following SDS objectives:



Addressing health inequalities and creating a healthier City Region



Creating high quality buildings and places that allow our communities to flourish



Delivering an Inclusive Economy



Embedding Social Value in all aspects of development

7. How can we make sure this approach would work?

- 7.1. Data sets around the following areas could be used to monitor the effectiveness of the suggested policy:

- The performance of planning applications against the suggested policy approach;
- Obesity levels of year 6;
- Number of fast food outlets (Food Standard Agency);
- IMD data sets

Social Infrastructure – Our Considerations

1. Issues and Opportunities

- 1.1. We envisage that the SDS would protect and support the delivery of facilities that promote health, wellbeing and social cohesion and that these facilities would be defined as ‘social infrastructure’. The suggested SDS definition of social infrastructure would include community, education, health, indoor and outdoor sport and leisure facilities, and communal/public buildings/places where people can meet.
- 1.2. We will be further developing our evidence base on existing and planned social infrastructure in the City Region. But 2017 evidence suggests that travel times to general health practices are generally good across most of the City Region; especially for those who have access to a car, though in some areas the nearest GP is over 20 minutes away for those without car access¹. Hospital accessibility in the City Region in some areas can involve a 45-minute journey by foot or public transport, or roughly a 30-minute journey by car².
- 1.3. Owing to health inequalities in the City Region, the need to ensure sufficient social infrastructure is pressing. The Government’s 2019 English Indices of Deprivation show that almost a third of the City Region’s neighbourhoods are within the top 10% most deprived in England. As such the City Region is significantly more deprived than the national average. Furthermore, based on these indices, almost half of the City Region’s neighbourhoods are within the top 10% most health deprived within England, with areas of high health deprivation tending to be those also affected by high levels of multiple deprivation.
- 1.4. Healthy life expectancy at birth is [defined](#) by Public Health England as the estimate of the average number of years that babies born in a given time period will live in a state of ‘good’ general health. This is dependent on average mortality levels at each age, and the level of good health at each age, remaining constant in the future. Within most areas of Liverpool City Region healthy life expectancy is below the national average for males and females and is particularly low within areas impacted by high levels of deprivation³. The prevalence of common mental health disorders is at or above national levels across the six boroughs of the City Region, whilst severe mental health disorders are more prevalent within the City Region than nationally⁴.

¹ LCRC Evidence Research & Intelligence.

² LCRC Evidence Research & Intelligence.

³ LCRC Evidence Research & Intelligence.

⁴ LCRC Evidence Research & Intelligence.

2. Why does the Spatial Development Strategy need to address this?

- 2.1. The SDS has a statutory duty to address health and health inequalities.
- 2.2. Paragraph 20 of the [National Planning Policy Framework](#) (NPPF) sets out that strategic policies should make sufficient provision for infrastructure and community facilities. To provide the social, recreational and cultural facilities and services the community needs, paragraph 92 of the NPPF sets out that planning policies should: plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; take into account and support delivery of local strategies to improve health, social and cultural well-being; guard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
- 2.3. Paragraph 94 of the NPPF sets out that it is important that a sufficient choice of school places are available to meet the needs of existing and new communities. At paragraphs 96- 97 the NPPF then notes the evidential requirements and importance of opportunities for sports and physical activity for the health and well-being of communities, and how sports and recreations facilities should be protected. The [National Design Guide](#) is also of relevance, and notes the role that schools, nurseries, community facilities, parks, other open spaces, health, and religious or cultural facilities can have in promoting social interaction and integration, and helping combat loneliness.

3. What is being done by the Combined Authority?

- 3.1. Health forms part of the Metro Mayor's Manifesto, wherein he identifies that he will tackle City Region health issues by:
 - Delivering joined-up initiatives with Local Authorities and NHS Trusts that encourage healthy and active lifestyles across the City Region as part of an integrated public health strategy.

- Being an advocate for people impacted by poor mental health and dementia, tackling the stigma and championing the services they need.

3.2 The Combined Authority have also produced a number of plans and strategies to help improve health and address health inequalities across the City Region. The City Region already has a number of initiatives and strategies that support social infrastructure including the [Liverpool City Region Combined Authority Cycling and Walking Infrastructure Plan](#) and the [Liverpool City Region Combined Authority Local Journeys Strategy](#), both of which will help increase physical activity and reduce use of vehicular transport, with associated reductions in emissions. Based on the critical mass of scientific assets within the City Region, open health innovation is recognised as a transformational opportunity in the [draft Local Industrial Strategy](#).

4. What you told us

4.1. Of relevance to social infrastructure, responses to our previous SDS engagement highlighted:

- That health matters and that more could be done across the City Region to improve this.
- That access to health and social services is a major issue that contributed to poor life expectancy and quality of life.
- Services should be more ‘joined up’ and not require a car to access.
- Parks and green spaces should be protected and enjoyed for leisure purposes.
- There is not enough sports pitch or facility provision to meet current and future demand.

5. How we could respond

5.1. To help address health and health inequalities in the City Region, a suggested social infrastructure SDS policy approach is set out below:

Existing strategic social infrastructure would be identified and protected, and support would be given to the growth of strategic social infrastructure in locations that are highly accessible by walking, cycling, public transport and to all of the community.

5.2. We note that the [Government's Planning White Paper](#) proposes a move towards a map and rule based approach as opposed to vague statements of policy, and use of renewal, growth and protection areas. Furthermore, the White Paper proposes the introduction of a national levy to replace the Community Infrastructure Levy and planning obligations. The suggested policy approach above could be further developed to be consistent with these proposals. We will review and refine the suggested policy approach in response to any further details that emerge on the White Paper and as we develop our evidence base.

6. Which Objectives will this approach help to achieve?

6.1. The suggested policy approach will help support the following SDS objectives:



Addressing health inequalities and creating a healthier City Region



Creating high quality buildings and places that allow our communities to flourish



Delivering an Inclusive Economy



Embedding Social Value in all aspects of development

7. How can we make sure this approach would work?

7.1. Data sets around the following areas could be used to monitor the effectiveness of the suggested policy:

- Population projections;
- Mapping of social infrastructure facilities;
- Travel time/accessibility; and
- Levels of physical activity/obesity levels.

Digital Connectivity - Our Considerations

1. Issues and Opportunities

- 1.1. From fibre broadband to 5G, the Combined Authority has a goal for the City Region to become the most digitally connected region in the UK, recognising that ultrafast connectivity can transform the economy, and the way we all work, live and play.
- 1.2. Fixed broadband infrastructure is generally good across the City Region, with 97.6% of premises having access to superfast broadband capability (although rural areas have a slightly lower level of access) whilst 72% have access to ultrafast broadband¹. Whilst fibre to the premises (FTTP) coverage is greater than regional and national levels, it is clustered in certain areas in the City Region². However, despite the infrastructure in place, the take up of broadband is still relatively low, and City Region broadband speeds have scope for improvement, as can be seen in Figure 1.
- 1.3. A number of different types of digital connections are available, with FTTP recognised as the fastest and most capable digital connection. This is evident in the comparison with other typical broadband speeds (measured by megabits per second - Mbps) below:
 - Superfast broadband, speeds in excess of 30 Mbps.
 - Ultrafast broadband, speeds in excess of 300 Mbps.
 - FTTP, speeds in excess of 1,000 Mbps.
- 1.4. For the City Region, other notable digital connectivity related statistics show that:
 - 16.4% of premises have access to full fibre in the Liverpool City Region which remains lower than Leeds City Region³.
 - Over 60% of Liverpool City Region neighbourhoods in the 10% most nationally deprived areas are characterised as 'e-withdrawn', compared to just 23% overall⁴.

¹ LCRCA Evidence Research & Intelligence.

² LCRCA Evidence Research & Intelligence.

³ Ofcom Connected Nations summer update 2020

⁴ Alexiou, A. and Singleton, A, 2018.

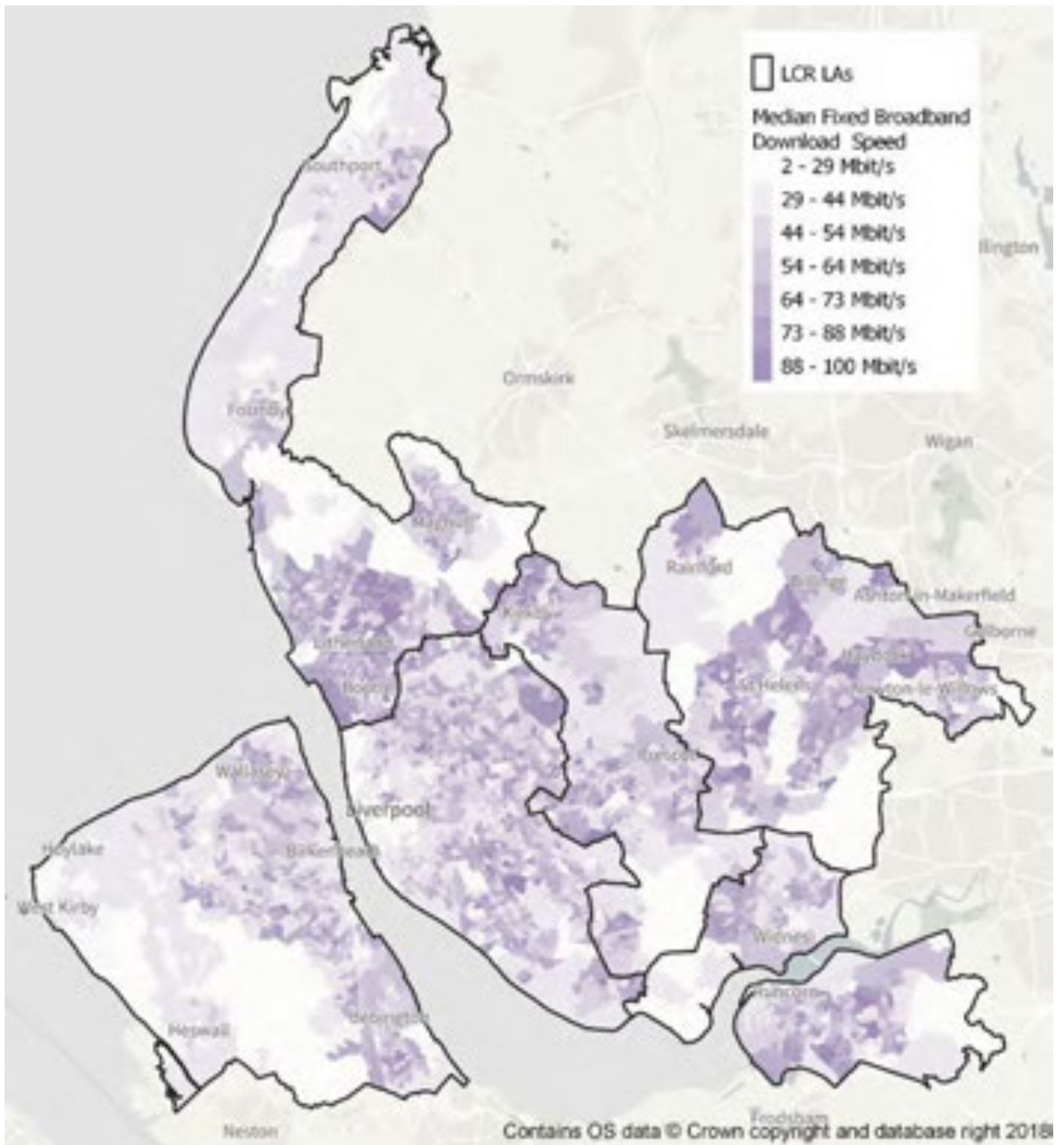


Figure 1. Median Fixed Broadband Download Speeds, 2019

- Rural areas have a slightly higher proportion of premises without access to superfast broadband infrastructure (around 5%⁵).
- Despite having more widespread broadband infrastructure than average, take up is still relatively low, this could be partly down to the lack of skills and affordability⁶.
- Compared to national and regional averages, a greater proportion of City Region premises have good 4G services from all operators both outdoors and indoors⁷.

2. Why does the Spatial Development Strategy need to address this?

- 2.1. The [National Planning Policy Framework](#) (NPPF) states that planning policies should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. It goes on to say that policies should set out how high quality digital infrastructure accessible from a range of providers is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments.
- 2.2. The NPPF also states that planning policies should have regard to Local Industrial Strategies when setting out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. 'Digitalisation' is a recurring theme throughout the [draft Liverpool City Region Local Industrial Strategy \(LIS\)](#).
- 2.3. The [National Infrastructure Commission](#) have set a nationwide full fibre broadband coverage target by 2033. This target would ensure full fibre connectivity is available to 15 million homes and businesses by 2025, 25 million by 2030, and all homes and businesses by 2033. The Government has also set an ambition for the UK to be a global leader in the next generation of mobile technology - 5G (see '[A 5G Strategy for the UK](#)'), and in March 2018 the [Liverpool 5G Testbed was awarded Government funding](#). Recently the Government set out its intention to

⁵ Ofcom Connected Nations, 2020.

⁶ LCRCA Evidence Research & Intelligence

⁷ LCRCA Evidence Research & Intelligence.

support the deployment of 5G infrastructure through [reforming permitted development rights](#).

- 2.4. The COVID-19 pandemic has further emphasised the growing importance of digital connectivity, with an increasing number of people remotely working, socialising and accessing services from home. However the ability to work remotely varies across sectors, for example homeworking is less likely in manufacturing, construction, retail, and health and social care. Although we are not in a position to predict with certainty what the long term trends will be, it appears likely that homeworking will increase, particularly for some sectors, and accessing services and socialising online may well become more common owing to improved familiarity and user confidence. This would mean that those places without access to adequate and reliable digital infrastructure, alongside people who do not have the necessary skills or resources, are at risk of being left behind economically and socially.

3. What is being done by the Combined Authority?

- 3.1. The Metro Mayor in his Manifesto sets out his belief that the City Region's future prosperity will depend on its ability to renew and modernise its connections, including revolutionising digital capacity. Of specific relevance to digital connectivity, the Manifesto envisages:

- The City Region as an exemplar smart city and a connected digital city.
- Expanding opportunity and ensuring digital equality to ensure everyone in the City Region have the skills and online access they need.
- The City Region becoming a hub for expertise in artificial intelligence, virtual reality, augmented reality and robotics.

- 3.2. Digitalisation is one of five core competencies identified in the LIS, which when applied to key City Region assets results in a number of ambitions including 'industrial digitalisation for sustainability'. The LIS envisages that this particular ambition 'will play a key role in supporting the City Region's clean growth ambitions, harnessing and applying the innovations of the fourth industrial revolution to clean growth and creating a sustainable industrial future'. Infrastructure is a key foundation of productivity, namely 'connecting all of our communities to opportunity'. Key priorities to strengthen this foundation of

productivity include future readying and integrating infrastructure and connecting all homes, businesses, and communities to the fastest possible fibre broadband.

- 3.3. It is the above aspects of the LIS that a digital connectivity policy in the SDS could specifically address. More widely and outside of the direct influence of the SDS, analysing and addressing gaps in digital skills in the City Region forms part of the [Digital and Creative Skills for Growth Action Plan 2018 – 2020](#).
- 3.4. A key part of being the most digitally connected region will be creating a full fibre network through the ‘LCR Backhaul Network’ to cover the six local authority areas in the City Region, connecting key assets such as the Hartree Centre in Daresbury, and one of the UK’s main transatlantic fibre optic cables which comes ashore in Southport and carries internet traffic between the UK, North America and the rest of the world. The LCR Backhaul Network will be developed using a ‘dig once’ principle, ensuring that digital infrastructure is installed at the same time as highway works to save time, money and disruption.

4. What you told us

- 4.1. Of relevance to digital connectivity, responses to the previous SDS engagement highlighted:
- A lack of high speed internet across the City Region.
 - That not all places have sufficient digital infrastructure, particularly in rural areas.
 - The importance of residential and employment properties having access to sufficient internet speeds, to allow optimum use and flexible working.

5. How we could respond

- 5.1. As noted, the Government intends to reform permitted development rights to support the deployment of 5G. In addition we note the Government’s planning system reform white paper [Planning for the Future](#) which envisages a move towards a map and rule based approach as opposed to vague statements of policy. Whilst the Combined Authority is supportive of improving 5G provision across the City Region, we consider that the SDS is not in a position to set out specific requirements for its deployment at this stage. We will review what role the SDS could have in

5G provision once the Government's permitted development proposals are fully set out.

- 5.2. In its response to its consultation on [delivering gigabit-capable connections](#), the Government intends to amend Building Regulations to place obligations on housing developers to work with network operators to install gigabit broadband where this can be done within a commercial cost cap. However, at the time of writing the Building Regulations have not been amended. Whilst we will review our options should the Building Regulations be amended to deliver gigabit-capable connections, we are considering whether the SDS should have a policy that requires gigabit connections for specified residential development proposals.
- 5.3. We are also considering whether the requirement for a gigabit connection could be widened to non-residential development, particularly specified types of workplaces and social infrastructure facilities. An example of a policy that requires FTTP for residential and non-residential schemes is included in [Ashford's Local Plan](#), adopted February 2019 (see Policy EMP6). However we appreciate that any Gigabit policy requirement must be considerate of viability, site feasibility, other equivalent technological solutions, and the investment plans of telecom operators.
- 5.4. A suggested SDS policy approach to enhance digital connectivity across the City Region is set out below:

A gigabit connection requirement for specified thresholds and types of residential and non-residential planning applications would be set prior to residents or businesses moving in.

Where certain connections are demonstrated not viable or site feasibility is an overriding issue, the requirement would be for the next fastest broadband speed to be secured.

- 5.5. We will continue to develop our evidence base on digital connectivity and give further consideration to what thresholds, types and sizes of development the gigabit connection requirement could apply to. This will include consideration of bringing forward the changes to building regulations proposed by the Government,

as noted above. We also envisage that the suggested policy approach would recognise the strategic significance of the backhaul network. In addition, by avoiding the need to retrofit digital infrastructure, the suggested policy approach would help support the ‘dig once’ principle. Notwithstanding this, we are considering other ways the SDS could further support the ‘dig once’ principle, for example by ensuring public and private sector investment is fully coordinated.

6. Which Objectives will this approach help to achieve?



Delivering an Inclusive Economy



Tackling Climate Change and creating a greener City Region



Addressing health inequalities and creating a healthier City Region



Creating high quality buildings and places that allow our communities to flourish



Embedding Social Value in all aspects of development

7. How can we make sure this approach would work?

- 7.1. We could measure the number of new development that delivers gigabit connectivity in accordance with the suggested policy approach, and the overall levels of digital connectivity across the LCR.

Inclusive Economy

Employment Skills - Our Considerations

1. Issues and opportunities

- 1.1. Ensuring that residents have the required employment skills necessary to access employment will help widen economic opportunities in the City Region. Of relevance to employment skills is the [draft Liverpool City Region Local Industrial Strategy \(LIS\)](#) building on the approach set by the [Government's Industrial Strategy](#), identifies five foundations of productivity that require strengthening to unlock the full potential of the opportunities that exist in the City Region.
- 1.2. The LIS 'people' foundation is particularly relevant and seeks to ensure people in the City Region have the health, skills and opportunities to realise their full potential. Key priorities to address identified under this foundation include: improving skills mobility and opportunities for career progression and lifelong learning; ensuring skill sets and training evolve to reflect the changing economy and reflect business needs, and increasing the number of high quality employment opportunities in the City Region to attract and retain skilled workers.
- 1.3. The LIS highlights that a barrier which exists for some people, including graduates coming out of Liverpool's universities, is a lack of good quality jobs and opportunities within the Liverpool City Region. For others the challenge is having the right skills to access and sustain well-paid, high-quality work. For example, in order to match the national average for NVQ4+ qualifications, LCR would need a further 59,000 residents qualified to that level¹.
- 1.4. The Liverpool City Region Employer Skills Survey identified a total of 18,620 current workers lacking the necessary skills for the job, with 29% of the City Region employers unable to recruit employees with the relevant skills in comparison to 27% nationally². Furthermore, 23.7% of our working age population is inactive and as it stands, we have the fourth highest rate of economic inactivity of all LEPs in England³, with long term health problems identified as a key underlying cause by

¹ Liverpool City Region Combined Authority Local Industrial Strategy Draft, 2019.

² Liverpool City Region Combined Authority Skills Survey, 2017.

³ LCRCA Evidence Research & Intelligence.

the LIS. The high levels of inactivity that persists has a relationship with those with lower levels of qualifications⁴.

1.5. There are a number of additional headline statistics of relevance to employment skills in the City Region:

- For a City Region its size, it has a relatively low number of jobs⁵.
- 37% of neighbourhoods fall in the top 10% of most employment deprived neighbourhoods nationally⁶.
- A higher than average proportion of residents have no qualifications⁷;
- A decline in apprenticeships has become more prevalent from 2016/17⁸.
- During 2018/19 there were 22,245 total enrolments, whilst 5,797 apprenticeships were achieved⁹.

1.6. As a result of COVID-19 there is likely to be a dramatic increase in unemployment and poverty. The UK economy shrank by an unprecedented 20% in April as the country went into lockdown¹⁰. According to the latest figures, there have been 3.3 million new claims for Universal Credit since March 16th¹¹, 9.3 million employees have been furloughed¹² and a further 2.4 million people have applied for the Government's Self-Employment Income Support Scheme¹³. More recently the Metro Mayor has [announced](#) support for apprentices made redundant during the COVID-19 crisis.

1.7. The measures the SDS could use to address employment skills are confined to those related to the development and use of land. This includes measures such as ensuring sufficient provision of key strategic social infrastructure like schools and directing both the amount and location of land available for specific types of businesses, matters that would be set out by other SDS policies. However, where backed by evidence, planning policies elsewhere have been used to secure employment opportunities from development proposals.

⁴ LCRCA Evidence Research & Intelligence.

⁵ ONS Business Register and Employment Survey, 2018; ONS Mid-Year Population Estimates, 2018.

⁶ MHCLG Indices of Multiple Deprivation, 2019.

⁷ Liverpool City Region Combined Authority Local Industrial Strategy Draft, 2019.

⁸ DfE Apprenticeships and Traineeships, 2014/15 – 2018/19.

⁹ DfE Apprenticeships and Traineeships data.

¹⁰ ONS (2020). GDP monthly estimate, UK: April 2020. Office for National Statistics.

¹¹ Department for Work and Pensions (2020). Universal Credit declarations (claims) and advances: management information.

¹² HM Revenue & Customs (2020). HMRC coronavirus (COVID-19) statistics.

¹³ Billard, L. and Allen, D (2020). Statistical bulletin Self-Employment Income Support Scheme (SEISS) Official Statistics Press Queries.

2. Why does the Spatial Development Strategy need to address this?

- 2.1. The [National Planning Policy Framework](#) (NPPF) sets out that planning policies should help create the conditions in which businesses can invest, expand and adapt. It goes on to say that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The NPPF explains that the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 2.2. The NPPF also states that planning policies should have regard to Local Industrial Strategies when setting out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. [Planning Practice Guidance](#) sets out that in gathering evidence to plan for business uses, strategic policy making authorities will need to liaise closely with the business community, taking account of the Local Industrial Strategy to understand their current and potential future requirements.

3. What is being done by the Combined Authority?

- 3.1. The Metro Mayor's Manifesto places a strong emphasis on the role skills will have in achieving his economic ambitions for the City Region, which of relevance aims to:
 - Create a high-skill, high-value economy.
 - Align skill and training investment with identified skill deficits.
 - Improve education standards, career advice, and develop links between education and businesses.
 - Increase opportunities to study and train later in life.
 - Radically improving the quality and scope of apprenticeship provision.
 - Remove barriers and expand opportunities for all, including sectors under represented by women and extending access for BAME groups to every employment sector.
- 3.2. The Liverpool City Region Combined Authority (LCRCA) has a number of strategies to help improve employment skills in the City Region, which include:

- The [LCRCA Skills Strategy 2018-23](#), which building on eight years of successful partnership working that has contributed to rising skills levels among young people and adults, sets out a vision for an improved skills system, to ensure residents are equipped to respond to changing global and local conditions.
- The [LCRCA Employability Skills for Growth Action Plan 2018-20](#), which draws on evidence and primary research with key stakeholders to identify actions to address employability skills gaps and potential future employer demands.
- The [LCRCA Apprenticeship Growth Plan 2018-20](#), sets a vision to ‘increase the volume, breadth & relevance of apprenticeships across the Liverpool City Region enabling more employers and learners to access and benefit from apprenticeships’ and an aspiration to deliver 20,000 apprenticeships per annum by 2020.
- The [LCRCA Construction Skills Growth Action Plan 2018-20](#), which sets out an ambitious programme of work to help people into construction, to ensure they realise their potential and to ensure that businesses can access the construction skills they need now and in the future. It notes that there are 47,000 people working in construction in the Liverpool City Region. Based on an appraisal of anticipated construction, the document highlights that the City Region’s construction workforce will not meet demand.
- The [LCRCA Build Back Better Economic Recovery Plan](#), which includes a number of skill related programmes including fully funded offers for school leavers, a young person’s guarantee, and increased numbers of apprenticeships.

4. What you told us

4.1. Of relevance to employment skills, responses to our previous SDS public engagement highlighted:

- A lack of accessible high quality employment opportunities for locals and graduates.
- A lack of investment in training, education and apprenticeships in certain areas across the City Region.
- The need for better access to public transport, and that new employment should be focussed around transport hubs.
- That alongside reducing barriers to employment, inequalities require addressing.

5. How we could respond?

5.1. Individual development proposals could play an additional role in enhancing employment skills across the City Region, particularly larger scale development. However, mechanisms to secure obligations from development (such as section 106 agreements) have to satisfy a number of tests, namely to be necessary to make the development acceptable, directly related to the development proposed, alongside being fairly and reasonably related in scale and kind. In addition, the Government's planning system reform white paper [Planning for the Future](#) envisages a move towards a map based and clear rule approach rather than general policies for development. These factors, alongside a robust evidence base, is the context in which any employment skills policy requirement would be formed in.

5.2. In this light, a suggested SDS employment skills policy is set out below:

Major development proposals would be required to support a proportion of apprenticeships in construction, with a preference towards apprenticeships for City Region residents to secure sustainable employment.

5.3. We would need to consider how we define 'major development' and arrive at a justified figure to quantify the proportion of construction apprenticeships required. However, at this early stage we are seeking feedback on the principle of this policy approach, which we consider could help address employment skills gaps across the City Region whilst satisfying the tests and context set out above. Alongside the LCRCAs identified above, this suggested policy area would form part of a wider strategic approach to employment skills in the City Region.

6. Which Objectives will this approach help to achieve?

6.1. The suggested policy approach will help achieve the following SDS objectives:



Addressing health inequalities and creating a healthier City Region



Delivering an Inclusive Economy



Embedding Social Value in all aspects of development

7. How can we make sure this approach would work?

7.1. To ensure this suggested policy approach is successful, we could monitor policy performance around the following areas:

- Unemployment rates;
- Number of apprenticeships enrolments for construction;
- Number of apprenticeships awarded for construction;
- The number of planning permissions granted in accordance with or contrary to the suggest policy approach.

The Rural Economy - Our Considerations

1. Issues and Opportunities

- 1.1. The importance of food production, food security addressing externalities associated with agriculture and supporting high efficiency farming are recognised by the Government, as summarised in section 2 below. The City Region's rural economy includes around 320 agriculture, forestry and fishing businesses and 1250 associated jobs which produces £100m GVA per year. When compared with the North West and nationally these figures do not indicate a high concentration of jobs, businesses or GVA in this sector. However, the City Region contains a notable amount of best and most versatile agricultural land. Agricultural land classed as grades 1, 2 and 3 is set out in Figure 3.

2. What is the Spatial Development Strategy required to do?

- 2.1. The [National Planning Policy Framework](#) sets out that planning policies should contribute to and enhance the natural and local environment by: protecting and enhancing soils (commensurate with their statutory status or identified quality in the development plan); recognising the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and by preventing development from contributing to, being put at unacceptable risk from, unacceptable levels of soil pollution. The NPPF also sets out that planning policies and decision should recognise that some undeveloped land can perform many functions such as food production. The 'best and most versatile agricultural land' is defined by the NPPF as land in grades 1, 2 and 3a of the Agricultural Land Classification.
- 2.2. The Government's [25 Year Environment Plan](#) includes goals and policies related to reducing emissions and pollution associated with agriculture and food supply chains, sustainable soil management, and ensuring food is produced sustainably and profitably. In a global context, the Environment Plan identifies a need for resilient and sustainable food production, noting that climate change and the deterioration of natural environments are prime drivers of poverty, food insecurity and instability and can trigger conflict and migration. Whilst national emissions

associated with agriculture are 16% below 1990 levels¹, no progress has been made in agriculture emission reductions since 2008.

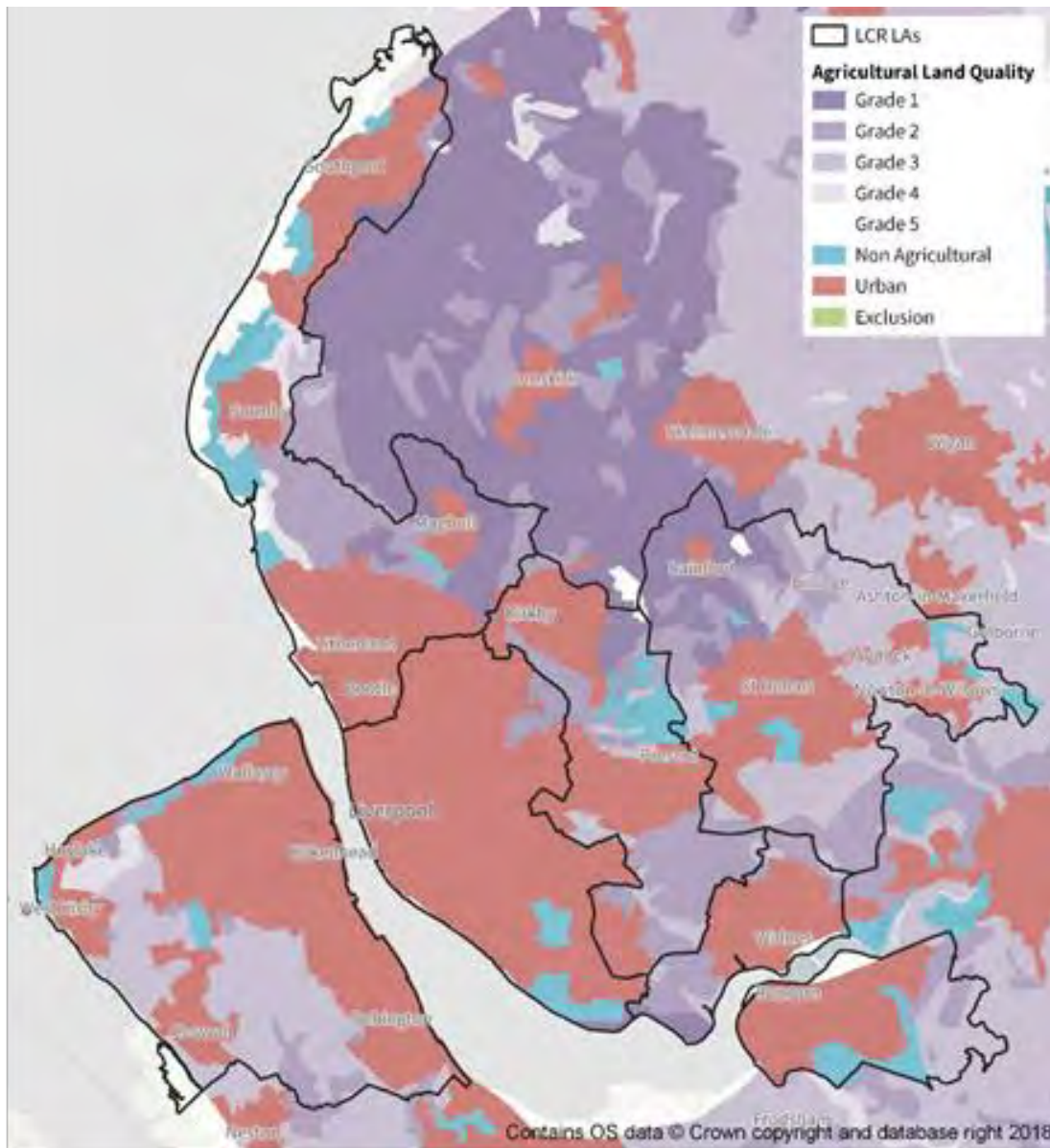


Figure 1. Liverpool City Region Agricultural Land Quality.

2.3. Furthermore, under the Grand Challenge of clean growth, the Government sets the aim to put the UK at the forefront of the global move to high-efficiency agriculture in its [Industrial Strategy](#). This in part is in recognition of the rising global demand for food and water which is increasing the need for agriculture to produce more

¹ Reducing UK emissions Progress Report to Parliament, Committee on Climate Change, June 2020.

from less and the role precision technologies can have in transforming food production whilst reducing emissions, pollution, waste and soil erosion.

- 2.4. [Part One of the National Food Strategy](#) details some of the wider implications to the food system (such as food insecurity, diets and hunger levels) as a result of COVID-19, alongside some of its wider negative externalities, such as pollution and biodiversity loss. Indeed, the proposed requirement in the [emerging Agriculture Bill](#) for the Secretary of State to prepare a report for Parliament relating to UK food security at least once every five years highlights the growing importance of food security. In addition, the February 2020 [Farming for the future: Policy and progress update](#) indicates that the Government are placing importance on food production and food security.

3. What is being done by the Combined Authority?

- 3.1. The Mayor's Manifesto notes that liveability and environment are increasingly key differentiators in determining how places are seen and how attractive and desirable they are. It also cites a need to ensure that the City Region is at the forefront of environmental conservation and sustainability, including safeguarding our natural assets.
- 3.2. The role locally sourced goods and produce that reduce food miles is acknowledged as having a role in reducing freight emissions in the City Region [Interim Air Quality Action Plan](#).

4. What you told us

- 4.1. During our previous engagement, 'protecting agricultural land' was a tag frequently included in responses. More detailed responses highlighted a concern around protecting best and most versatile agricultural land to protect food security for future generations, and challenges to agricultural land (due to climate change and increased risk of flooding). The need for policy to recognise the importance of food production, balanced against the need to allow nature to thrive, reduce climate impact and increase accessibility in rural areas was also raised

5. How we could respond

- 5.1. Uncertainties are associated with the UK's exit from the European Union and COVID-19. We also note the aspiration for farming to achieve [net zero greenhouse gas emissions by 2040](#) set out by the National Farmers Union. These factors, in combination with the plans and strategies noted above, have informed our initial view that a rural economy policy approach in the SDS that helps improve food security and support clean growth could bring economic and environmental benefits.
- 5.2. One way of addressing the issues identified above could be by further protecting the best and most versatile agricultural land in the City Region. We will be gathering further evidence to establish whether the SDS should offer protection to the best and most versatile agricultural land in excess of that set out by the NPPF. If justifiable, the SDS would set out a strong presumption against the loss of such land. A suggested SDS rural economy policy is set out below:

To enhance food security and reduce food miles by protecting the best and most versatile agricultural land in the City Region.

- 5.3. We note that the [Government's Planning White Paper](#) proposes a move towards a map and rule based approach as opposed to vague statements of policy, and use of renewal, growth and protection areas. Subject to underpinning justifying evidence, the above suggested policy approach could potentially be further developed to be consistent with these proposals.

6. Which Objectives will this approach help to achieve?



Delivering an Inclusive Economy



Tackling Climate Change and creating a greener City Region



Addressing health inequalities and creating a healthier City Region

7. How can we make sure this approach would work?

7.1. To ensure the suggested policy approach works, we could use monitoring indicators around the following areas:

- The amount of best and most versatile agricultural land in the City Region; and,
- Carbon dioxide and greenhouse gas emissions associated with agriculture in the City Region.

Social Economy - Our Considerations

1. Issues and opportunities

- 1.1. The [draft Local Industrial Strategy](#) (LIS) sets out the City Region’s long-standing reputation for social innovation and identifies the social economy as a key foundation for building thriving places and an inclusive economy, with approximately 45,000 people across 1,400 organisations working in this sector in the City Region. The LIS notes that the social economy incorporates grassroots, neighbourhood, community and voluntary groups, registered charities, social enterprises, cooperatives, and mutual societies. More recently, a [publication](#) by the Women’s Organisation has highlighted the importance and benefits of the City Region Social Economy, and sets out it is a priority sector which should be a focus of Liverpool City Region’s recovery plan.
- 1.2. The University of Liverpool Heseltine Institute publication entitled ‘[The Scale, Scope and Value of the Liverpool City Region Social Economy](#)’ uses a social economy definition that includes specified charities, social enterprises, cooperatives, and self-help initiatives along with universities and housing associations that hold a clear social purpose. The University of Liverpool publication also makes a link between where social enterprise locate and areas of deprivation, with over 39% of social enterprises located in neighbourhoods that are in the top 10% most deprived neighbourhoods nationally.
- 1.3. The City Region has a thriving social economy and Figure 2 sets out its value.

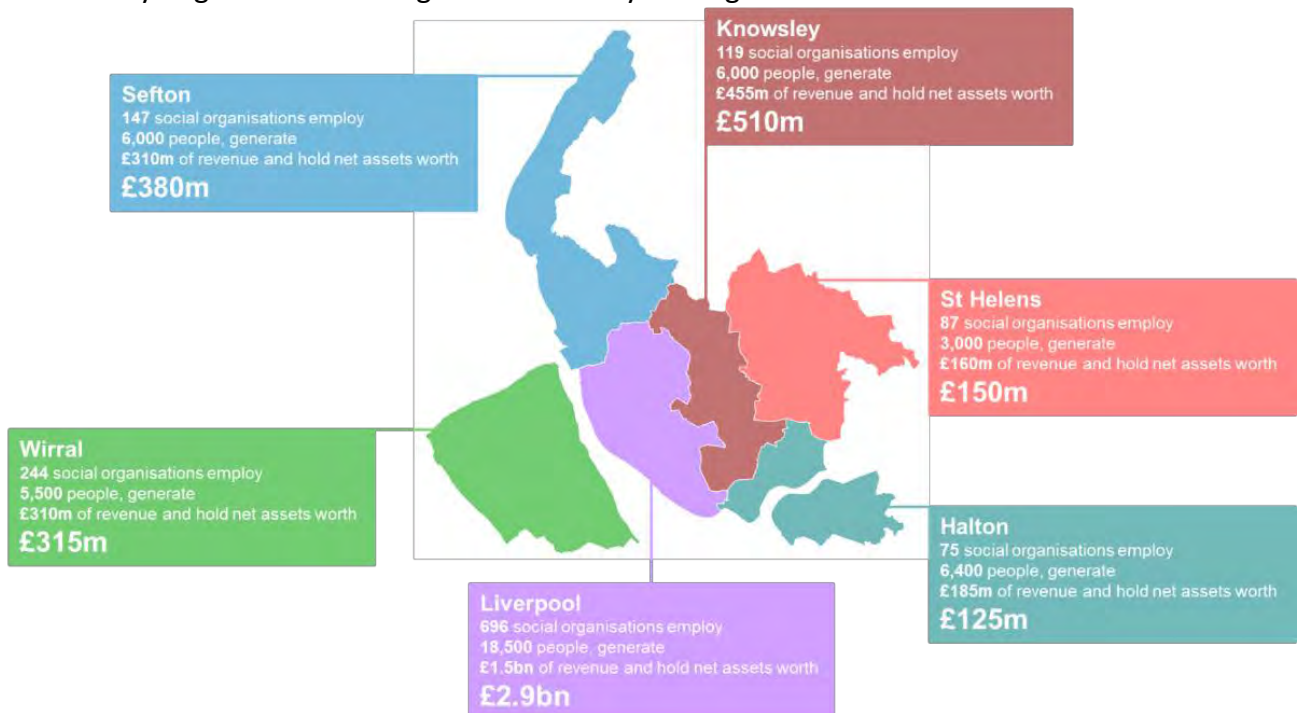


Figure 1. Liverpool City Region Social Economy

1.4. With the above in mind, the City Region social economy provides a strong starting point upon which to further enhance social capital, support community development, and accelerate innovation to help maximise the potential of people and places. A policy in the SDS that supports land uses and development associated with the social economy could have a key role in helping address City Region deprivation and delivering an inclusive economy.

2. Why does the Spatial Development Strategy need to address this?

- 2.1. The [National Planning Policy Framework](#) (NPPF) sets out that planning policies should help create the conditions in which businesses can invest, expand and adapt. It goes on to say that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The NPPF explains that the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 2.2. The NPPF also states that planning policies should have regard to Local Industrial Strategies when setting out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. [Planning Practice Guidance](#) sets out that in gathering evidence to plan for business uses, strategic policy making authorities will need to liaise closely with the business community, taking account of the Local Industrial Strategy to understand their current and potential future requirements.
- 2.3. To provide the social, recreational and cultural facilities and services the community needs, paragraph 92 of the NPPF sets out that planning policies should: plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; take into account and support delivery of local strategies to improve health, social and cultural well-being; guard against the unnecessary loss of valued facilities and services particularly where these would reduce the community's ability to meet its day-to-day needs; ensure that established shops, facilities and services are able to develop and modernise and are retained for the benefit of the community; and ensure an integrated approach

to considering the location of housing, economic uses and community facilities and services.

3. What is being done by the Combined Authority?

- 3.1. Within his Manifesto, to achieve a fair and just economy the Metro Mayor seeks to reward and promote fair and ethical business, using a City Region Fair Employment Charter to engage with the social economy. The CA has established the Fairness and Social Justice Advisory Board (FASJAB), which would alongside other groups, helps give a voice to the social economy.
- 3.2. The LIS seeks to support the expansion of the social economy by providing investment opportunities for new start-ups and scale ups, including through Kindred, an innovative and locally owned organisation that seeks to support Socially Trading Organisations through investment, partnerships and support. In delivering the City Region's Local Grand Challenge 'the home of the most inclusive economy in the UK' adopting a community wealth approach and supporting the social economy are as some of the key actions.
- 3.3. As part of our Building Back Better Economic Recovery Plan, support from Government has been sought to deliver a community and voluntary sector resilience programme and funding is planned to support Kindred. The particular importance of socially trading organisations during the COVID-19 pandemic has been [highlighted by the Metro Mayor](#).

4. What you told us

- 4.1. Of relevance to social enterprises, responses to the previous SDS engagement highlighted we should:
 - Bring back community driven shops.
 - Engage more with the community sector.
 - Support social enterprises and encourage organisations to be anchor institutions.
 - Explore how to optimise conditions for the development of the social economy.

5. How we could respond?

5.1. Social economy uses do not fall into a single planning use class. Nor does it appear that there a consistent way of referring to or defining the overall sector, which different descriptions used. In addition, a review of existing national and local planning policies suggests that the role of the social economy has not been widely recognised by the planning system. As this is a relatively new topic in planning policy, we are keen to receive responses on what role the SDS could have in supporting the land use and development needs of the social economy. To support the important role the social economy has in the City Region, a suggested SDS policy approach is set out below:

To protect against the unjustified loss of land and buildings being used by social enterprises and social organisations, and support the development of new social economy uses to grow; particularly in areas located in the highest levels of deprivation.

5.2. We acknowledge that the types of uses and development the suggested policy approach would apply to would need to be precisely defined and we will be considering this matter further. We also note the Government's planning system reform white paper [Planning for the Future](#) which envisages a move towards a map and rule based approach as opposed to vague statements of policy. As such the suggested policy approach could require revision and a more spatial led approach. Notwithstanding this, for this public engagement we are seeking views on the principle of the suggested policy approach.

6. Which Objectives will this approach help to achieve?

6.1. The suggested policy approach will help achieve the following SDS objectives:



Delivering an Inclusive Economy



Embedding Social Value in all aspects of development



Creating high quality buildings and places that allow our communities to flourish

7. How can we make sure this approach would work?

7.1. To ensure the suggested policy approach works, we are considering using monitoring indicators relating to:

- Social Enterprise start-ups and death rates;
- The GVA value, and number of organisations and employees in the SE sector;
- The number of planning permissions that have resulted in the creation, enhancement or loss of a social enterprise.

Placemaking & Communities

Design Quality - Our Considerations

1. Issues and opportunities

- 1.1. The importance of new development achieving good design is well established in the planning system. The importance of good design is also recognised by the Metro Mayor, and has been reflected in a number of development projects in the Liverpool City Region that have won design awards, which include:
- Everyman Theatre – RIBA Stirling Prize winner.
 - Alder Hey Children's Hospital - RIBA North West Award 2019.
 - Liverpool's Royal Court - RIBA North West Award 2018, RIBA North West Conservation Award 2018 and RIBA National Award 2018.
 - Farnworth House – RIBA North West Award 2019.
 - Royal Liverpool Philharmonic - RIBA North West Award 2017 and RIBA National Award 2017.
- 1.2. The important role the planning system has in achieving high design standards is becoming increasingly recognised. The [Building Better, Building Beautiful](#) Commission set out that beauty must become the natural result of working within the planning system, which to achieve requires three aims; ask for beauty, refuse ugliness, and promote stewardship. The Commission advocate an integrated approach in which placemaking is considered from the outset and subjected to a democratic or co-design process. Values that matter to people - beauty, community, history, landscape being safe guarded, places, not units; high streets, not glass bottles; local design codes, not faceless architecture that could be anywhere, illustrate the Commission's perspective on design in the planning system.
- 1.3. The Combined Authority are keen to ensure that development within the City Region is designed to the highest standards, to achieve beautiful, safe, and sustainable buildings and places that enable healthier and happier lives.

2. Why does the Spatial Development Strategy need to address this?

- 2.1. [The National Planning Policy Framework](#) sets out that high quality places and buildings are fundamental to what the planning and development process should achieve. It also sets out that good design is a key aspect of sustainable development, that creates better places in which to live and work and helps make development acceptable to communities.
- 2.2. [National Planning Practice Guidance](#) identifies that strategic policies can be used to set key design requirements for strategic site allocations to explain how future master planning and design work is expected to be taken forward for these sites.
- 2.3. [The National Design Guide](#) establishes 10 characteristics of well-designed places, which comprise; context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan. The guide notes that well-designed places work to create physical character, a sense of community and positively address climate change.
- 2.4. In addition, the Government's planning system reform white paper [Planning for the Future](#) has a strong focus on design, and highlights the importance of preparing local design guides and codes and pattern books. This autumn, the Government intends to publish a National Model Design Code setting out more detailed parameters for development in different types of locations, alongside a revised version of the 'Manual for Streets'.

3. What is being done by the Combined Authority?

- 3.1. Of relevance to design quality, the Metro Mayor in his Manifesto sets out he will:
 - Promote good design and supporting concerted action to improve the quality and attractiveness of neighbourhoods across the City Region.
 - Appoint a Liverpool City Region design champion to promote good design (Paul Monaghan has since been appointed).

3.2. The Combined Authority are keen to ensure that development within the City Region is designed to the highest standards, to achieve beautiful, safe, and sustainable buildings and places that enable healthier and happier lives. In February 2020, the Combined Authority in association with the Liverpool City Region Design Champion and RIBA North West held a 'Forgotten Spaces' competition. Further details on this initiative can be found [here](#) and [here](#).

4. What you told us

4.1. Here is a summary of what you told us during our 12 week engagement last year in relation to design:

- Promote sustainable inclusive design and layouts that reflects a visionary design code.
- Introduce mandatory design and energy efficiency standards.
- Appoint a design champion for the LCR.
- Ensure that the density, design and materials will be appropriate and enhances its context.
- Have better designed buildings and places.
- Involve the community and architects in the design process.

5. How we could respond?

5.1. We consider that the SDS should have a positive role in setting out how development will achieve beauty that respects the City Region's unique characteristics, is future ready, safe, sustainable, and enables healthier and happier lives. In this light, we have listed a number of recognised design tools. An SDS design policy would need to be mindful of the planning system reform white paper which indicates that good design can be achieved by tools such as design guides, codes and pattern books, and envisages a move towards a map and rule based approach as opposed to vague statements of policy. We await the outcome of the Planning White Paper. In the meantime, we are keen to establish which

design tools would be most appropriate for securing good design; below is a list of planning tools that could be potentially utilised.

<p>Independent Design Review Panels (for example, Design Council/Places Matter/ a dedicated LCR panel).</p> <p>The Design Council have produced further details and guidance on design reviews which can be found here.</p>
<p>A City Region Supplementary Planning Document (SPD) on design.</p> <p>SPDs provide more detailed guidance that accompany development plan policies. Further details on SPDs can be found in the Planning Practice Guidance.</p>
<p>Masterplans.</p> <p>The Building Better, Building Beautiful Commission definition states that ‘a masterplan sets out proposals for blocks, buildings, spaces, street hierarchy, movement strategy green infrastructure and land use in three dimensions and matches these proposals to a delivery strategy.’</p>
<p>Design Codes.</p> <p>A Design Code is defined by the NPPF as ‘a set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.’</p>
<p>Context (or site and area) appraisal.</p> <p>Defined by the Design Council as ‘a detailed analysis of the features of a site or area (including land uses, built and natural environment, and social and physical characteristics) which serves as the basis for an urban design framework, development brief, design guide, or other policy or guidance.’ Design and Access Statements incorporate a form of context appraisal and are required for certain types of planning applications. The SDS could be informed by or require detailed context appraisals for certain sites and areas in the City Region.</p>

Design competitions (for example, RIBA design competition e.g. University of Liverpool School of Architecture).
Design Awards (for example, RIBA NW awards, LCR specific awards and Stirling Prize).
Dedicated Design Officers to advise/support Local Authorities.
Any others, please specify.

5.2. Sustainable design was a common suggestion from the previous engagement. We will be considering how we can achieve energy efficiency standards for non-residential development when the Government further details its Planning White Paper proposals. Our suggested approach to housing standards is set out elsewhere in this engagement.

6. Which Objectives will this approach help to achieve?

6.1. The suggested policy approach will help support the following SDS objectives:



Creating high quality buildings and places that allow our communities to flourish



Addressing health inequalities and creating a healthier City Region



Tackling Climate Change and creating a greener City Region



Delivering an Inclusive Economy



Embedding Social Value in all aspects of development

7. How can we make sure this approach would work?

- 7.1. Depending on which design tool is chosen as part of the suggested policy approach, we could measure whether the development constructed accords with the relevant requirements, and review whether the development post-completion achieved good design.

Housing Standards – Our Considerations

1. Issues and Opportunities

1.1. The [Liverpool City Region Housing Statement \(2019 – 2024\)](#) sets out that the Combined Authority want to ensure that the quality of new housing is of a high standard, well designed, accessible, thermally efficient, technologically linked and future proof. To help tackle climate change, a target of ‘net zero’ carbon by 2040 has been set in the City Region and a [climate emergency](#) was declared in 2019. The Metro Mayor has also [challenged house builders](#) to make the City Region an exemplar for innovation, sustainability and design excellence. In addition, where justified, national planning policy and guidance allows certain types of additional housing standards to be a requirement for new residential development. The national and City Region policy context is summarised further on in this document.

1.2. Key statistics relevant to housing standards in the City Region include:

- Based on 2019 Council Tax data from the Value Office Agency, 44% of properties in the City Region were built pre-1939, compared to 37% nationally.
- Of the EPCs lodged since 2008, 63% were rated D or below, compared to 37% EPC rating C or above in 2019, demonstrating the poor quality and energy efficiency of properties in the Liverpool City Region, compared to the national average of 61%¹.
- 13.2% of households in the Liverpool City Region currently experience fuel poverty compared to 10.3% nationally².
- ONS 2019 population estimates suggest that 19% of the City Region are 65 years and over compared to 18.4% nationally. By 2050, the over 65 age group is set to increase to 24.7% of the national population³.
- 2019 evidence indicates that 47% of the top 10% of lower super output areas in the City Region are the most health deprived nationally. Areas of high health deprivation tend to be associated with high levels of multiple deprivation.
- Based on 2019/2020 data, the City Region has a higher than average amount of 16 to 64 year olds who are long-term disabled (as defined by the Equality

¹ MHCLG (2020) Live Tables on Energy Performance of Building Certificates.

² BEIS (2020) Sub-regional Fuel Poverty 2018 data.

³ ONS (2019) Mid-Year Population Estimates.

Act), or have work limiting disability (23.6%) compared to national (21.4%) figures, indicating higher rates of people with limiting health conditions⁴.

- Based on 2011 ONS Census data, approximately 6% of properties are overcrowded, with 1% experiencing extreme overcrowding in the Liverpool City Region, compared to the national average of 8%.
- The COVID-19 pandemic has demonstrated the need for high quality external amenity space. During lockdown, 12% of households in Great Britain did not have access to private or shared garden space and the North West of England has below national levels of accessible public open space according to 2020 evidence⁵.
- According to [Waterwise](#), average water consumption per person per day is 141 litres nationally. In the North West of England, whilst it is indicated that water stress levels are not serious, there are moderate levels of stress according to the [Environment Agency](#). [DEFRA](#) indicate that water stress is likely to persist and worsen based on a number of environmental factors including increasing summer temperatures and a reduction in rainfall. The [Climate Change Committee](#) promotes increased water efficiency measures by 2030 of 105 litres per person per day.

2. What is the Spatial Development Strategy required to do?

- 2.1. Paragraph 127f) of the [National Planning Policy Framework](#) sets out that planning policies should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. The corresponding footnote states that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing (where this would address an identified need for such properties), and that policies may also make use of the nationally described space standards, where the need for an internal space standard can be justified. Guidance on justifying optional technical standards can be found in the [National Planning Practice Guidance](#), whilst the nationally described space standards can be found [here](#).

⁴ NOMIS (2020) Annual Population Survey.

⁵ RTPI (2020) Planning for the World We Need.

- 2.2. The NPPF also sets out the need to take flood risk into account through the use of natural flood management techniques such as sustainable drainage systems (SuDS) where appropriate.
- 2.3. The [National Design Guide](#) (NDG) is also relevant and identifies ten characteristics that make a well-designed place, one of which relates to ‘homes & buildings’. Under this characteristic, the NDG identifies that well-designed homes and buildings: provide good quality internal and external environments for their users, promoting health and well-being; relate positively to the private, shared and public spaces around them, contributing to social interaction and inclusion; and resolve the details of operation and servicing so that they are unobtrusive and well-integrated into their neighbourhoods. The NDG also refers to tree planting, water efficiency, cycle storage, and sets out well-designed buildings follow the energy hierarchy, which includes maximising the potential for energy supply from decentralised, low carbon and renewable energy sources.
- 2.4. Street trees have been promoted in the Government’s Planning White Paper [Planning for the Future](#). Tree planting can mitigate some of the impacts of climate change, sequester carbon emissions and make developments more attractive. [Mersey Forest](#) have planted over 9 million trees and have set tree planting goals to increase woodland cover to 20% of the area. Nationally the [Forestry Commission](#) have set out goals to plant 30,000 hectares of trees per year by 2050, whilst the Government have recently completed a [consultation to inform a new Tree Strategy](#) to set out policy priorities to deliver an ambitious tree planting programme. The consultation document further reinforces the Government’s commitment to street trees and states a need to ensure appropriate trees are incorporated in development, in ways that they can thrive, be easy to maintain, and minimise the risk of damage or interference with buildings or infrastructure.
- 2.5. The Government intend to consult further on a number of matters relating to housing standards, which include the [Future Homes Standard \(2025\)](#) and the [National Tree Strategy](#). Recently the Government begun a consultation on [Raising Accessibility Standards for New Homes](#)’, whilst previous other relevant consultation includes electric vehicle charging points in the [Road to Zero Strategy \(2018\)](#). In its response to its consultation on [delivering gigabit- capable connections](#), the Government

intends to amend Building Regulations to place obligations on housing developers to work with network operators to install gigabit broadband where this can be done within a commercial cost cap. Further details on our suggested digital connectivity policy approach are set out elsewhere in this engagement.

- 2.6. We will review our suggested approach to housing standards when further details are available on these cited Government consultations. However, subject to development viability, we are considering accelerating a number of these standards by including them within a suggested housing standards policy.
- 2.7. The quality of new homes will have a direct effect on achieving the City Region's carbon neutrality target. Indeed the [Climate Change Committee report 'UK housing: Fit for the future?'](#) recognise that new homes must be built to be low-carbon, energy and water efficient and climate resilient. The Climate Change Commission also state that the cost of meeting the aims of its report are not prohibitive and that getting design right from the outset is vastly cheaper than forcing retrofit later on. Nonetheless, any housing standards required by the SDS would need to form part of a wider viability appraisal to ensure housing delivery is not detrimentally affected.

3. What is being done by the Combined Authority?

- 3.1. The Metro Mayor's Manifesto has a number of aims of relevance to housing standards, including:
 - Developing eco-friendly and energy-efficient housing.
 - Expanding and encouraging electric vehicles.
 - Promoting good design and supporting concerted action to improve the quality and attractiveness of neighbourhoods across the City Region.
 - A plan for a fairer, greener housing market.
- 3.2. The Combined Authority understands the importance and benefits of good quality homes. The Liverpool City Region Housing Statement (2019 – 2024) identifies that 'a decent, good quality home helps support better health, promotes educational attainment, support independent living and can contribute to improving the

environment'. The statement also highlights that a quality housing offer supports an inclusive economy, addresses fuel poverty and helps achieve our zero carbon 2040 target, improves community sustainability, helps people live independently for longer, supports the City Region's ambition to become a world leader in modern construction methods with associated high skilled jobs, and prevents homelessness wherever possible.

- 3.3. As 80% of properties in the Liverpool City Region will remain and be lived in by 2040, there is a need to improve the housing standards of new developments to achieve high quality built and future-ready developments to meet the changing population need⁶. The City Region Housing Statement sets an intention to improve the quality of the existing housing stock, and also identifies that City Region homes are responsible for over a third of total energy consumption and a third of carbon emissions. Current national initiatives for housing retrofit include the national [Green Homes Grant](#), whilst in the City Region, local authorities undertake a number of initiatives such as Eco-Flex, Warm Homes Grant, and boiler replacement and cavity wall insulation funding schemes.
- 3.4. The above initiatives will bring many benefits and make an important contribution to the City Region zero carbon 2040 target. However, as housing retrofit initiatives can often be undertaken without the need for planning permission, they will not be within the direct influence of the SDS.
- 3.5. More recently, the Combined Authority in its [LCR Economic Recovery Plan \(2020\)](#) have committed to 'Building Back Better', setting out a number transformational opportunities for place and communities in the City Region for Government support. Ambitions include achieving net-zero carbon neutrality by improving our current housing stocks' energy efficiency through retrofit initiatives and growing our housing supply across the region to be inclusive and fit for the future.

⁶ HAPPI (2009) The HAPPI Report, Housing LIN.

4. What you told us

4.1. Of relevance to housing standards, responses to our previous SDS public engagement highlighted challenges and opportunities around:

- Ensuring that design standards promote for accessible and inclusive design for all.
- Development viability.
- Improving energy efficiency of new housing stock.
- Increasing tree-planting.
- Improving health and wellbeing outcomes related to poor quality housing.
- Providing electric charging points for new homes.

5. How we could respond

- 5.1. The Government's planning system reform white paper [Planning for the Future](#) has a strong focus on design and highlights the importance of preparing local design guides and codes and pattern books. As noted above, alongside the Planning White Paper, we will be monitoring a number of Government consultations relevant to housing standards and will review our approach if necessary. We will also be considering what design standards could be applied to non-residential development such as offices, commercial premises and public buildings.
- 5.2. At this stage we are considering which recognised housing standards, as set out in the table below, could be included as a housing standard requirement in the SDS. We are interested in hearing your views on which standards would be most appropriate for new homes in the City Region. The standards below are likely to have financial viability implications that could affect housing delivery in the City Region. As such we intend to undertake a viability appraisal of the options suggested below.

Standard	Description
Accessibility Standards	<p>Technical Standard Building Regulations M outlines three options for accessibility;</p> <ul style="list-style-type: none"> • M4(2); ‘Accessible and Adaptable Dwellings’ (Optional) • M4(3); ‘Wheelchair User Dwellings’ (Optional) <ul style="list-style-type: none"> ○ M4(3)a – Wheelchair adaptable ○ M4(3)b – Wheelchair accessible <p>Subject to justification, the SDS housing standard policy could set a requirement for residential development to provide M4(2) and M4(3) dwellings.</p>
Future Homes Standard (2025)	<p>The Future Homes Standard (2025) consultation proposes revisions to following parts of the Building Regulations:</p> <ul style="list-style-type: none"> • Energy efficiency standards (Part L) • Ventilation (Part F) <p>The SDS could potentially bring this standard forward, particularly in light of the City Region net zero carbon target by 2040.</p>
Water efficiency standards	<p>Planning Practice Guidance states that where local authorities can demonstrate a local need, tighter optional building regulation standards can be used (110 litres/per person/per day can be implemented).</p> <p>Subject to justification and viability, the SDS could include the above noted water efficiency standard as a housing standard requirement.</p>

<p>Nationally Described Space Standard</p>	<p>Nationally Described Space Standard addresses gross internal space for bedrooms, storage, and floor to ceiling height to ensure for adequate space in dwellings. Subject to justification and viability, the SDS could include this housing standard as a requirement.</p>
<p>External Amenity Space</p>	<p>The NDG promote well-designed external space include high quality private and shared space, and balconies. Such space could be private or public and should address usability including environmental factors such as sunlight, shade, noise and pollution. Subject to justification and viability, the SDS could include an external amenity housing standard which identifies a minimum space and quality requirement.</p>
<p>Tree Planting</p>	<p>Subject to justification, consideration of site practicalities and viability, the SDS could require a minimum tree standard for new housing development.</p>
<p>Secure Cycle Storage</p>	<p>The NDG promotes appropriate storage for bicycles, and cycling brings health and environmental benefits. Furthermore, the Liverpool City Region Walking and Cycling Infrastructure Plan supports the uptake of cycling. Subject to justification and viability, the SDS could include a minimum cycle storage standard for new housing development.</p>

<p>Low Carbon/ Renewable Energy Sources</p>	<p>There are a number of renewable energy sources that can help address climate change, such as:</p> <ul style="list-style-type: none"> • Combined Heat and Power (CHP). • District Heat Networks. • Ground Source Heat Pumps. • Solar panels. <p>Subject to justification, consideration of site practicalities and viability, the SDS could require a renewable low carbon/renewable energy requirement for new housing development.</p>
<p>Electric Vehicle Charging Points</p>	<p>The Government's Road to Zero Strategy intends to amend the Building Regulations to deliver electric vehicle charging points. At present it is not clear if and when these proposed changes will be enacted.</p> <p>Subject to justification, network capacity, consideration of site practicalities and viability, the SDS could bring these changes forward as a requirement for new housing development.</p>
<p>Sustainable Drainage Systems</p>	<p>Sustainable drainage systems have multiple benefits that go beyond flood protection. Specified types of residential development could be required to deliver sustainable drainage systems, subject to site practicalities and viability.</p>

<p>Digital Connectivity Standard (Residential)</p>	<p>As set out elsewhere in this engagement, we suggest a gigabit connection requirement for specified thresholds and types of residential planning applications that would be set prior to residents moving in.</p> <p>Where certain connections are demonstrated not viable or site feasibility is an overriding issue, the requirement would be for the next fastest broadband speed to be secured.</p> <p>For more details on this suggested standard, please see our suggested Digital Connectivity policy approach.</p>
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6. Which Objectives will this approach help to achieve?



Addressing health inequalities and creating a healthier City Region



Tackling Climate Change and creating a greener City Region



Creating high quality buildings and places that allow our communities to flourish



Delivering an Inclusive Economy



Embedding Social Value in all aspects of development

7. How can we make sure this approach would work?

7.1. We could monitor whether development proposals deliver the relevant housing standard requirements at development management stage.

For further information and to sign up to our SDS
mailing list, please visit:

<https://www.liverpoolcityregion-ca.gov.uk/lcr-our-places/>

For other enquiries, please email:

planning@liverpoolcityregion-ca.gov.uk



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