



**LIVERPOOL
CITY REGION**
COMBINED AUTHORITY

METROMAYOR
LIVERPOOL CITY REGION



Stage 1 Engagement Summary

October 2019 – January 2020

Summary of previous engagement and our response

Environment and Climate Change

Summary of planning related comments	Our Response
<p><u>Green Belt</u></p> <ul style="list-style-type: none"> - Concerns about loss of Green Belt/it should be protected. - Wider benefits and roles are associated with the Green Belt. - A refreshed Green Belt Assessment should be undertaken to release suitable large land parcels. 	<p>At this stage we are not engaging on matters relating to development needs. This will be covered in the next engagement stage in summer / autumn 2021.</p> <p>In line with regulations, the SDS will not amend existing Green Belt boundaries.</p>
<p><u>Natural Environment/Greenspace</u></p> <ul style="list-style-type: none"> - Concerns about loss of greenspace. - Greater protection should be given to greenfield sites. - Benefits are associated with the natural environment. - Protect and enhance the natural environment and natural assets. - Biodiversity, geodiversity, ancient woodlands, soils, priority habitats, ecological networks, protected sites and species should be covered. - The SDS should consider coastal adaption, work with the natural coastal process, and provide strategic direction on coastal matters. - The main challenge is to align economic development and improvement in wellbeing and in the natural environment. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective and suggested policy approach relating to the Natural Environment and Green Infrastructure.</p>
<p><u>Climate Change</u></p> <ul style="list-style-type: none"> - Need to mitigate and adapt to climate change, more drastic action needed. - Reducing greenhouse gas emissions is identified as a challenge. - The impact of road and air freight on emissions and need for a modal shift to rail and waterborne transport. - Need to use up to date baseline data on key variables to support policies and future monitoring. - Warehouses have environmental impacts. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested policies approach relating to the Natural Environment and Green Infrastructure and Energy and Resources.</p> <p>At this stage we are not engaging specifically on matters relating to transport or employment land. This will be covered in the next engagement stage in summer / autumn 2021.</p>

<ul style="list-style-type: none"> - Need to develop an annual carbon budget to assess performance and develop and integrate carbon descent plans. - Carbon budgets for different scenarios. - A clear plan is needed to show how decarbonisation will happen by 2040. - A 2030 target for carbon neutrality should be adopted. - Increase in population bound to mean increases in greenhouse gas emissions. - Recognise the role of the natural environment to reduce the effects of climate change. - Continue promotion of the clean growth sector, particularly renewable energy. - Decouple economic growth from a growth in emissions. 	
<p><u>Biodiversity</u></p> <ul style="list-style-type: none"> - Loss of habitats and species is a challenge. - Plan positively for the creation, protection, enhancement and management of biodiversity networks. - Loss of habitats and species detrimental to both nature and people, at land and sea. - Implement biodiversity net gain and local nature recovery. - The core biodiversity area, comprising designated sites and priority areas, should be protected and nature recovery networks should link to them. - Implement a natural capital approach and biodiversity net gain principles to secure funding for a nature recovery network. - Support nature’s restoration and recovery in a meaningful way. - The Government’s programme of mandatory bio-diversity gain may deliver some of the city region’s environmental objectives without the need for specific policies - Identify international, national and local sites. SSSIs, European sites and Ramsar sites should not only be protected, but further enhanced. - Have a strategic approach to consider both mitigation measures and biodiversity enhancements across the city region. - Consider geodiversity conservation. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested policy approach relating to the Natural Environment and Green Infrastructure.</p>

<ul style="list-style-type: none"> - Loss of biodiversity results in a loss of soil fertility and soil, prompting further reliance on artificial fertilisers and pesticides. - Reduce light pollution to limit effects on human health and wildlife. - New buildings should have to be built with wildlife considered. - Opportunity for SUDs to create for biodiversity, health and wellbeing and urban realm benefits. 	
<p><u>Air Quality</u></p> <ul style="list-style-type: none"> - There is poor air quality in certain parts of the City Region. - Introduce 'clean zones' in all affected areas. - Accurate and representative air quality measurements is important - Airport and container/cruise ship port expansion brings in huge amount of air pollution. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing objective, and suggested policy approach relating to Air Quality.</p> <p>At this stage we are not engaging specifically on matters relating to transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Energy/Resource Efficiency</u></p> <ul style="list-style-type: none"> - Buildings should achieve high standards of energy efficiency. - Use of passive homes for all future housing development. - Address energy efficiency of older housing (which also addresses health issues). - Require all new buildings with parking provision to have electric vehicle charging points. - Electric cars not the future for transport. - Land developments to promote water efficiency. - New development should not only be carbon neutral but actively enhance the environment. - Bring empty homes into use. - Hydrogen could have a role in bus transport, but serious limitations on a mass scale. - Monitor regulatory changes at the national level to avoid duplication and additional complexity, including the proposed 'future homes standard'. - Care is required in improving the energy efficiency of historic buildings. - Promote reduced reliance on non-renewable energy. 	<p>Please see our current engagement, in particular our proposed Placemaking and Communities and Climate Change and the Environment objectives, and suggested policy approaches relating to Housing Standards and Energy and Resources.</p> <p>At this stage we are not engaging specifically on matters relating to transport. This will be covered in the next engagement stage in summer / autumn 2021.</p> <p>Bringing empty homes into use is a matter which can not be directly influenced by the SDS.</p>

<ul style="list-style-type: none"> - All new homes to be water efficient. - Economic viability of retrofitting houses needs addressing. 	
<p><u>Energy</u></p> <ul style="list-style-type: none"> - Lack of renewable energy is a challenge. - Support renewable energy, including as part of new development. - Heat pumps in all our parks and green spaces. - More research into using biofuels. - Support renewable energy especially with offshore wind installations. Linked job opportunities. - There are tidal opportunities from the River Mersey - Solar panels on roofs of warehouses and on new houses as standard - Mersey Barrage should have a rail crossing on it and be integrated with the development of the Garden Festival project. - Metro Mayor announced tidal generation from the River Mersey but no progress. Projects such as tidal barrage or lagoon should be considered with much higher regard and importance. - Use of hydrogen if produced from renewable sources. - Liverpool imports energy be self-sustained or an output city. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested policy approach relating to Energy and Resources.</p>
<p><u>Active Travel</u></p> <ul style="list-style-type: none"> - Not enough cycling lanes, safety for cyclists, concern about quality of cycle lanes, connectedness and total length. - Active travel infrastructure – put public and active transport front and centre to reduce private car dependency. - Provide more funding to active travel measures than to electric vehicle charging points. - Use a spatial plan to show where cycle lanes are needed. - Secure cycle storage would encourage the use of public transport. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing objective, and suggested policy approach relating to Active Travel.</p> <p>At this stage we are not engaging on spatial matters. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Flooding/Drainage</u></p> <ul style="list-style-type: none"> - Flood risk is a challenge. - Have a presumption against new development in flood risk areas or that would increase flood risk elsewhere, ensure resilience to flooding. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested</p>

<ul style="list-style-type: none"> - Use SUDs and natural based solutions. Integrate with green infrastructure - Drainage should be an early development consideration. - Manage surface as close as possible to source. - Predicted impacts of climate change need to be seriously considered to ensure resilience. - Deal with historic river pollution in the City Region. - Require zero net effect on surface water drainage and flood risk and storm flows to sewerage system and no risks to sewerage works and the water environment. - Flood measures and water management changes can impact the historic environment. - Protect habitats from water related impacts and where appropriate seek enhancement. - Not having enough green space coupled with loss of green space through development is increasing flood risk. 	<p>policy approach relating to the Natural Environment and Green Infrastructure.</p>
<p><u>Transport</u></p> <ul style="list-style-type: none"> - Promote greener transport. - Rail use limited by lack of an integrated transport policy and a shortage of parking at stations. - Repurpose surplus car parking space and disused town centre areas into accessible open spaces. - Do not focus on electric cars, public transport infrastructure and secure cycle storage first. - Freight from the docks could be loaded onto a rail network or canals could be used. - No evidence to justify the expansion of Liverpool airport. - Trolley buses should be reintroduced on all trunk bus routes/from town & cities. - Cycle lanes often conflict with and hinder smooth operation of bus routes. - Car ownership is higher for those with higher income; alternative transport solutions support local income groups. - More park and ride facilities may encourage more train use. 	<p>Please see our current engagement, in particular our proposed objectives, and suggested policy approach relating to Active Travel and Housing Standards. At this stage we are not engaging specifically on matters relating to transport or infrastructure.</p>

<ul style="list-style-type: none"> - Motorcycle use of bus lanes, secure parking for bikes and motorbikes to reduce commuting by car. - Haulage and buses should be forced to become electric or hydrogen powered. - Prefer a national and standardised approach to the provision of electrical charging points in new residential development. - Any electrical vehicular charging policy requirement must be supported by viability and feasibility evidence. - Practical difficulties for electric vehicle charging points with apartment related development. - Safe and fully accessible sustainable transport routes for all users. - Removal of HGVs from the road network. 	
<p><u>Trees</u></p> <ul style="list-style-type: none"> - Increase tree-planting and improve woodland access. - The region has woodland coverage below the national average so missing out on multiple benefits. - Tree loss an issue, have better protection of trees, including mature and veteran trees. - The SDS should maintain NPPF increased protection for irreplaceable ancient woodland and ancient and veteran trees. - Have an ambitious target to double tree cover by 2045. - Identify potential land for woodland creation and tree planting. - Have a good reason for increasing tree planting: ensure they will be managed and maintained, plant the right tree in the right place. - Trees should be mandatory for any new development. - Trees in town centres improve the public realm and have proven health benefits. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Placemaking and Communities objectives, and suggested policy approaches relating to the Natural Environment and Green Infrastructure and Housing Standards.</p>
<p><u>Agricultural Land</u></p> <ul style="list-style-type: none"> - Protect best and most versatile agricultural land to protect food security - Climate change and flooding risks to agricultural land and food production. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Inclusive Economy objectives, and suggested policy approaches relating to the</p>

<ul style="list-style-type: none"> - Policy needs to recognise the importance of food production, a balanced policy which allows nature to thrive, reduces climate impact of production but allows business to produce food in demand. - A policy which reduces food output in the city region could increase global imports from areas with lower environmental standards and greater greenhouse gas emissions. - Protect and improve the spaces we have and encourage green farming practices. - Do not protect agricultural land – agriculture can be very polluting and can only be beneficial if managed well. - Explore new approaches with agriculture. 	<p>Natural Environment and Green Infrastructure and the Rural Economy.</p> <p>At this stage we are not engaging specifically on matters relating to the pattern and scale of development. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Green Infrastructure</u></p> <ul style="list-style-type: none"> - The cost of incorporating green infrastructure in smaller sites unviable: identify a few larger sites in sustainable locations. - We should integrate and delivery green infrastructure. - Industrial legacy contamination has impacted the quality of green and blue spaces. - Integrate green infrastructure into all major infrastructure planning, more cost effective and successful compared to retrofit. - Blue and green infrastructure should have equal weight. - Increase land for allotments. - Protect and enhance the historic environment including buildings, parks, landscapes, open spaces and blue infrastructure and the positive contribution they can make to managing climate change. - Green Infrastructure has links with reducing flood risk. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested policy approach relating to the Natural Environment and Green Infrastructure.</p>
<p><u>Design</u></p> <ul style="list-style-type: none"> - We should tackle challenges by ‘greening’ development (green roofs/walls). - Green roof/walls have embedded energy and maintenance costs. - New development should include some space for public access. - Importance of resilience in dealing material hazards and terrorism; can impact the historic environment. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Placemaking and Communities objectives, and suggested policy approaches relating to the Natural Environment and Green Infrastructure and Design Quality.</p>

<ul style="list-style-type: none"> - Workplaces designed to reduce carbon load and located and planned to minimise the need for longer journeys. - Consider site drainage at the initial stage of development. 	<p>At this stage we are not engaging specifically on matters relating to the pattern and scale of development or the historic environment. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Vehicle Dependency</u></p> <ul style="list-style-type: none"> - Too much dependency on cars is identified as a challenge. - We need realistic alternatives to private vehicles. - Public transport over car – built in not retrofitted. - Rail connectivity to airport. - Facilitate sustainable patterns of development in close proximity to public transport, jobs and local services. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing and Inclusive Economy objectives, and suggested policy approach relating to Active Travel.</p> <p>At this stage we are not engaging specifically on matters relating to the pattern and scale of development or transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Water</u></p> <ul style="list-style-type: none"> - Protect ground water sources. - Approach flood and water resilience together. - Development should consider potential impacts on water quality. - The use of boreholes to abstract water is becoming more common practice as we begin to become more resilient to climate change. - Development within Groundwater Protection Zones should include mitigation to protect and potentially improve water quality. - Ensure protection of public water supply and require water efficiency. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective and suggested policy approach relating to Energy and Resources.</p>
<p><u>Location/Scale of Development</u></p> <ul style="list-style-type: none"> - Facilitate sustainable patterns of development on brownfield sites in close proximity to public transport, jobs and local services. - Funding for site remediation and ensure developing brownfield sites is affordable. - Confirm the minimum housing requirement and the distribution to each local authority. - Significant mixed-use schemes can support energy-efficient housing and well-connected employment and services. 	<p>Please see our current engagement, in particular our proposed SDS objectives.</p> <p>At this stage we are not engaging specifically on matters relating to the pattern and scale of development or transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>

<ul style="list-style-type: none"> - Brownfield land should always be redeveloped as opposed to building on the Green Belt. - Positive choices so journeys are not single occupancy private car. - Opportunities for employment and shopping should be supported where they can regenerate areas and reduce the need for travel. - Direct economic activity towards key corridors that can facilitate opportunities accessible to local populations. - Use powers available to compulsory purchase land for remediation and assembly. - Criticisms of the City Region SHELMA. - Too much emphasis on business development within Liverpool city centre. Employment opportunities on outskirts of the city will reduce congestion, emissions and travel. - Rejuvenate town centres through integrated living working and recreation space. - Concentrate development in urban areas, preference given to low rise flats and high-density houses. - The SDS should show where public transport is available, where new services are intended, or where existing serves are to be enhanced. - The SDS should indicate broad locations/corridors for growth and strategic development locations. - Apportion development needs. - Provide a spatial plan showing where investment will be prioritised to support housing delivery and economic growth. - Urban regeneration is an objective in itself. - Could promote/re-establish dispersed local centres, potentially with implications for density and the transportation network. 	
<p><u>Infrastructure</u></p> <ul style="list-style-type: none"> - All infrastructure must be in line with the climate emergency, the city region’s carbon budget and carbon reduction pathway. - New infrastructure should be designed to have a positive impact on nature and be carbon neutral as a minimum, ideally a net carbon absorber. 	<p>At this stage we are not engaging specifically on matters relating to infrastructure. Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>

<ul style="list-style-type: none"> - More sustainable infrastructure including cycling lanes, affordable housing and education. - Development needs to provide supporting infrastructure. 	
<p><u>Waste</u></p> <ul style="list-style-type: none"> - Manage and minimise waste and pollution. - Use household waste to power housing estates. - Reduce our future energy and waste demands. - Excessive amount of unnatural waste is detrimentally affecting human health. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective and suggested policy approach relating to Energy and Resources.</p>

Healthier, Safer and Resilient Homes and Communities

Summary of planning related comments	Our Response
<p><u>Ageing Population</u></p> <ul style="list-style-type: none"> - Meeting the needs of an ageing population is a key challenge. - There is not enough seating for the elderly. - Build affordable care homes in the right place. - More areas for social interaction. - More accessible and affordable homes built for elderly & disabled people. - Need to plan homes for the elderly and special needs: expected to grow and implications for the NHS. - Monitor the Government proposed Building Regulations changes to accessible and adaptable homes: might be unnecessary to make policy in this area. - New homes for older people will help free up existing family housing stock and deliver homes attractive to first time buyers. - Trying to keep people in warm, safe, accessible homes for as long as is practical is a priority challenge. 	<p>Please see our current engagement, in particular our proposed Placemaking and Communities and Climate Change and the Environment objectives, and suggested policy approaches relating to Housing Standards and Energy and Resources.</p> <p>At this stage we are not engaging on matters relating to the pattern, scale and type of housing development.</p>
<p><u>Green Belt</u></p> <ul style="list-style-type: none"> - Concerns about building on the Green Belt. 	

<ul style="list-style-type: none"> - Include a policy to require local authorities to allocate or amend Green Belt boundaries where it is necessary to meet local needs. - Failure to consider de-designating Green belt land could potentially render the SDS unsound. - Need to plan for a level of Green Belt release to meet needs: review the Green Belt. 	<p>At this stage we are not engaging on matters relating to development needs. This will be covered in the next engagement stage in summer / autumn 2021.</p> <p>In line with regulations, the SDS will not amend existing Green Belt boundaries.</p>
<p><u>Open/Green Spaces</u></p> <ul style="list-style-type: none"> - Green spaces are essential for mental and physical well-being: protect, enhance, and improve access to them. - Well-designed/maintained spaces to encourage social interaction, reduce fear of crime and increase physical activity. - Future development should incorporate open spaces which have multiple uses. - Unnecessary building on greenspaces without infrastructure is a challenge. - Accessible seating areas important for all communities. - Improved facilities for young people and teenagers. - Protect and enhance the countryside, green space and Green Belt and make them more accessible. - Ensure access to the water environment - Reducing recreational disturbance to internationally protected coastal sites is a challenge. There is an opportunity for the SDS to set a Recreation Mitigation Strategy. - Recognise areas of open space of important public value. - Access to open spaces is a challenge. - Create more open spaces. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Health and Wellbeing objectives and suggested policy approaches relating to the Natural Environment and Green Infrastructure, Active Travel and Design Quality.</p>
<p><u>Design.</u></p> <ul style="list-style-type: none"> - Poorly designed buildings and public spaces are a challenge. - Poor design has a number of negative consequences. - Town centres lack identity. - Crime is identified as a challenge that could be reduced with better design. - Design of new developments not conducive to sustainable transport. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Placemaking and Communities objectives, and suggested policy approaches relating to the Natural Environment and Green Infrastructure,</p>

<ul style="list-style-type: none"> - Preserve and consider the historic environment. - Criticism of the generic design of development, which creates a number of negative consequences. - Good design is essential to ensure buildings are resilient, attractive, affordable to run and fit for purpose. - The most vulnerable tend to suffer disproportionately the consequences of poorly designed and located housing. - Good quality, inclusive design is a key mechanism to the creation of better places for communities to live and work, that can support health and reduce physical inactivity - Communities need to be mixed in places that have some amenities and are well insulated and sound proofed. - Housing estates are not designed to optimise easy access particularly for car users - Design should encourage sustainable materials and sustainable fuel efficiency. - Schemes should adhere to sustainable design and construction principles and take into account whole life/lifecycle costs. - Experience suggests a focus on speeding up housing delivery often results in a loss of local distinctiveness owing to standard house types. - The built and historic environment can help reinforce local distinctiveness in housing developments. - Wider use of design review. - Create areas that enable people to socialise with their neighbours. - The needs of women are not at the forefront. 	<p>Energy and Resources, Active Travel, Design Quality and Housing Standards.</p> <p>At this stage we are not engaging on matters relating to patterns of development, transport or heritage. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Health Care</u></p> <ul style="list-style-type: none"> - Access to healthcare facilities is identified as a challenge. - Not considered in development. - Existing healthcare services are struggling to cope with demand. - Access to local health care a necessity for healthier, safer and resilient communities. - Should be co-located near employment and public sector support. - Distance to health care centres mean people delay seeking treatment. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing objective, and suggested policy approach relating to Social Infrastructure.</p> <p>At this stage we are not engaging on specific matters relating to the pattern and scale of development or transport. This will be</p>

	covered in the next engagement stage in summer / autumn 2021.
<u>Crime</u> <ul style="list-style-type: none"> - Crime is identified as a challenge. - Crime has links with mental health, poverty and high unemployment. - Crime can be reduced through better design. - Poverty is a barrier to healthy, safe and resilient communities. - Community centres to reduce crime. 	Please see our current engagement, in particular our proposed Health and Wellbeing, Inclusive Economy and Placemaking and Communities objectives, and suggested policy approaches relating to Design Quality and Social Infrastructure.
<u>Air Quality</u> <ul style="list-style-type: none"> - Poor air quality is identified as a challenge. - Air quality affects rates of respiratory disease. - Reduce HGVs to address pollution and air quality. - Electric vehicles will only deal with a small amounts of particulate pollution. - Break dust makes up a part of particulate pollution: road and house schemes need to be optimised. - Use of mechanical ventilation and heat extraction to ensure occupants can thrive on fresh air. - Planting more trees could be used to address air quality. - Access to open spaces which are free from traffic and industrial pollution is essential to health and well-being. - Air pollution remains a significant threat to human health, biodiversity and ecosystem services. - Policies should address the impacts of air quality on the natural environment. - Support the design of public spaces and transport to improve air quality. - Enhance and maintain urban green spaces to absorb carbon and reduce it by encouraging recreation and walking near homes. - Ensure pedestrian and cycling are realistic and first choice options. - Identify and protect the city region's blue and green open spaces network. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment, Health and Wellbeing and Placemaking and Communities objectives, and suggested policy approaches relating to Air Quality, Active Travel, Design Quality, Housing Standards, and the Natural Environment and Green Infrastructure.</p> <p>At this stage we are not engaging specifically on matters relating to transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<u>Energy/Resource Efficiency</u> <ul style="list-style-type: none"> - The energy efficiency of homes is identified as a challenge. - Investment in energy efficient buildings brings many benefits. 	Please see our current engagement, in particular our proposed Placemaking and Communities and Climate Change and the

<ul style="list-style-type: none"> - The SDS should ensure minimum safety standards. - New builds should be as carbon neutral as possible. - Use solar panels on new buildings. - New development should achieve passive house/BREEAM standards or equivalent. - All new development except very minor should include renewable energy. - Retrofit existing buildings to reduce energy consumption. - Existing housing stock and open spaces should be improved. - Exceeding Building Regulation standards providing electric vehicle charging points are more possible on larger sites. - Energy efficient street lighting. 	<p>Environment objectives, and suggested policy approaches relating to Housing Standards, Design Quality and Energy and Resources.</p> <p>At this stage we are not engaging specifically on matters relating to transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Employment</u></p> <ul style="list-style-type: none"> - Unemployment is identified as a challenge. - Better employment opportunities are required. - Logistics and warehouse provide the wrong type of employment. - Challenges include providing good training, including to transition to a low carbon economy. - Deliver economic development on gateway routes to deliver employment for local people. - Ensure jobs and homes are in close proximity. - Regeneration of buildings to encourage employment opportunities. 	<p>Please see our current engagement, in particular our proposed Inclusive Economy objective, and suggested policy approach relating to Employment Skills.</p> <p>At this stage we are not engaging on matters relating to the pattern, type and scale of development. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Economy</u></p> <ul style="list-style-type: none"> - A challenge is securing a transition to a low carbon, circular economy, ensuring no communities are left behind. - Digital connectivity is important. - Commit to measures to deliver a low carbon circular economy. - Support local businesses to be the hub of communities. 	<p>Please see our current engagement, in particular our proposed Inclusive Economy and Climate Change and the Environment objectives, and suggested policy approaches relating to Digital Connectivity and Energy and Resources.</p>
<p><u>Transport</u></p> <ul style="list-style-type: none"> - Meeting the needs of non-car users is a challenge. - Car dependent housing estates are the problem not the answer. 	<p>Please see our current engagement, in particular our proposed objectives, and suggested policy approach relating to Active</p>

<ul style="list-style-type: none"> - Improve walking and cycling routes. - Designs should incorporate safe, fully accessible sustainable transport schemes at the concept stage. - Storage facilities and re-charging points for e-bikes, adapted cycles, wheelchairs/mobility scooters are needed to further encourage travel by these modes. - Need to introduce visible and viable alternatives to cars. - Provide efficient reliable public transport that takes people to where they want to go. - Well connected to healthcare and other essential facilities and services - accessibility. 	<p>Travel and Design Quality. At this stage we are not engaging on matters relating to the pattern and scale of development or transport.</p>
<p><u>Housing</u></p> <ul style="list-style-type: none"> - Build more homes and set a completion deadline for the developer. - Physically join the city region by building high quality homes. - Build more affordable housing and affordable rental local authority accommodation. - Need good quality affordable homes with enough space. - Empty homes need to be put back into use. - Must plan for the right number of homes of the right type in the right places, and reverse trend of executive style homes on greenfield sites with unaffordable 'affordable' homes. - Low quality of homes in Liverpool. - Eradicating homelessness must be central to the SDS. - Higher densities in appropriate locations. - New development should be zero carbon/ BREEAM standards or equivalent. - New builds should be as carbon neutral as possible with renewable energy and electric vehicle charging points as standard. - The SDS and its housing requirement and trajectory should take precedence over previously adopted Local Plans. - The SDS needs to stress the importance of Local Plans allocating sufficient non-strategic sites to meet its housing requirement. - Masterplan reappraisals of existing neighbourhoods. 	<p>Please see our current engagement, in particular our proposed Placemaking and Communities and Climate Change and the Environment objectives, and suggested policy approaches relating to Housing Standards and Energy and Resources.</p> <p>At this stage we are not engaging on matters relating to the pattern, scale and type of housing development. This will be covered in the next engagement stage in summer / autumn 2021.</p> <p>Bringing empty homes into use is a matter which could not be directly influenced by the SDS.</p>

<ul style="list-style-type: none"> - Build a range of tenures to support young workers, families, ageing population and targeted needs for growth in specialist housing. 	
<p><u>Active Travel</u></p> <ul style="list-style-type: none"> - Energy efficient mobility is essential. - Active routes need to be at the heart of planning. - Spaces should link to employment, public services and connect to active travel, such as cycle routes. - Improve to walking and cycling routes. - Protect and enhance public right of ways and National Trails - Recognise the value of rights of ways and access to the natural environment. - Need to link to existing rights of way where possible and consider provision for new access opportunities. - Recognise the coastal path work and include reference to this within policies. - Improve connectivity not just cycling and walking routes. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing and Climate Change and the Environment objectives, and suggested policy approaches relating to Active Travel and the Natural Environment and Green Infrastructure.</p>
<p><u>Flooding</u></p> <ul style="list-style-type: none"> - Protect communities from flooding. Climate adaption spending needs to target vulnerable communities. - New development should be kept away from the floodplain. - Redevelopment in flood prone areas should seek to improve flood management by utilising nature-based solutions, such as SUDS. - Physical and mental health can be affected during and after flooding. - Incorporate flood and coastal risk management into design requirements. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested policy approach relating to the Natural Environment and Green Infrastructure.</p>
<p><u>Trees</u></p> <ul style="list-style-type: none"> - The SDS should commit to woodland creation schemes and targets to increase tree canopy cover. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Placemaking and Communities objectives, and suggested policy approach relating to the Natural Environment and Green Infrastructure and Housing Standards.</p>
<p><u>Biodiversity</u></p> <ul style="list-style-type: none"> - Commit to nature’s restoration and recovery and improve access to nature. - SUDs that benefit wildlife. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested</p>

	policy approach relating to the Natural Environment and Green Infrastructure.
<p><u>Location and Scale of Development</u></p> <ul style="list-style-type: none"> - Reclaim and regenerate derelict and contaminated sites. - A key challenge is to support new development and captures its benefits to solve issues such as worklessness, poor quality housing, healthcare access, low design quality and low educational attainment. - Need a spatial strategy that address the pattern, amount, quality of development, settlement roles and key economic assets. - Full and objective employment and housing needs should be accommodated within individual districts. - Criticism of the standard methodology set out in national policy. - Should focus on brownfield sites, aid delivery, and ensure the most efficient use of land in appropriate locations. - Provide opportunities to deliver economic development on key gateway routes. - Commit to a brownfield first policy and consider use of targets to keep track of progress. - Need better infrastructure delivery plans and less use of greenspace when developing strategy. - More office space in Liverpool is needed. - More development of business parks in Wirral and St Helens. - Create jobs across the LCR in a more balanced way, linked by transport and in highly populated areas. - Older persons housing needs should be established and set by benchmark targets. - The SDS housing figure should support economic growth, affordable housing, the devolution deal and planned investment, - Ensure local authorities meet housing and employment needs and growth ambitions. - Concerns raised over a brownfield first approach – not in accordance with the NPPF. 	<p>Please see our current engagement, in particular our proposed SDS objectives.</p> <p>At this stage we are not engaging on specific matters relating to the pattern, type, and scale of development or transport. This will be covered in the next engagement stage in summer / autumn 2021.</p> <p>Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>

<ul style="list-style-type: none"> - SDS should provide guidance on housing types and quality to support economic growth. 	
<p><u>Food</u></p> <ul style="list-style-type: none"> - Commit to opportunities for local food growing. - Too much access to unhealthy food, lack of healthy options - fruit and vegetable shops disappearing. - Too many unhealthy shops (for example fast food and gambling) and we should limit fast food/alcohol/betting shops. - Accessibility of fast food outlets to school and university settings. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing and Inclusive Economy objectives, and suggested policy approaches relating to Healthy Food Businesses and the Rural Economy.</p>
<p><u>Sport and Leisure</u></p> <ul style="list-style-type: none"> - Decrease physical inactivity through use of ‘active design’. - Well designed, accessible, and linked local open spaces and playing fields will encourage local residents to be more active. - The unique role of sport and physical activity needs to be acknowledged. - There is not enough sport pitch provision to meet current and future demand, with potential loss of sports pitch provision exacerbating existing and future deficiencies. - Sport catchment areas are not defined by administrative boundaries. - Should promote exercise and social interaction. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing objective, and suggested policy approaches relating to Active Travel and Social Infrastructure.</p>
<p><u>Social Value</u></p> <ul style="list-style-type: none"> - The Social Value impact analysis type approach needs to be built upon further. 	<p>The SDS will be subject to a Social Value Assessment. In addition, please see our proposed Social Value objective.</p>
<p><u>Climate Change</u></p> <ul style="list-style-type: none"> - Any significant project that is contrary to climate change ambitions should be scrapped. - An attractive open space network makes a vital contribution to the quality of life and mitigating climate change effects. - Climate change demands less pollutants and better house energy efficiency. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Placemaking and Communities objectives, and suggested policy approaches relating to the Natural Environment and Green Infrastructure and Housing Standards.</p>

A Thriving and Vibrant City Region

Summary of planning related comments	Our Response
<p><u>Town Centres</u></p> <ul style="list-style-type: none"> - Declining town centres is identified as a challenge. - Online retail, retail parks, the cost of parking, low land values, fear of crime, and poor transport links are identified as damaging to town centres. - A lack of evening economy is identified as a challenge. - Evening economy often includes pubs/alcohol selling places, can lead to anti-social behaviour that discourages visitors. - Support evening economy with more public transport. - Lack of investment in town centres is identified as a challenge. - Need to improve transport links to and within town centres by non-car modes. - Health and fitness venues can enhance the overall vitality and viability of centres. - Need to reconsider the role of struggling town centres. - There are potential negative consequences of office space lost to housing via permitted development. - Do not let residential development cause the closure of cultural and evening venues or take precedence over existing public space. - Investment into substance misuse services and accommodation could help tackle town centre challenges. - Need a variety of offer and the right balance of businesses. - Alternative uses for vacant units should offer opportunities, including for housing. - Reducing the size of shopping areas could tackle town centre decline. - Active design could help. - Would support a flexibility in land use planning to allow agile responses to future trends. - Promote and support local businesses. 	<p>Please see our current engagement, in particular our proposed Inclusive Economy objective.</p> <p>At this stage we are not engaging on matters relating to the pattern, scale and type of development, which includes town centres. This will be covered in the next engagement stage in summer / autumn 2021.</p>

<ul style="list-style-type: none"> - The SDS should recognise town centres as community hub and inherently sustainable locations to live, work and play. - Recognise the role of civic, community, education and healthcare use in adding to town centres. - Green spaces have a vital role in town centres and town centres should be greened, including SUDs and space for urban food growing. - Should protect cultural uses and community centres. - Preserve character of town centres – clusters of heritage assets - Good design and a high-quality public realm are important. - Policies should facilitate a green, circular economy and sustainable enterprise. - Protect and promote the distinctiveness of town centres. - Benches and toilets encourage people to leave their homes. - Need to first develop thriving and vibrant communities. - Liverpool City Centre is a driver of economic growth. - Spend money outside of Liverpool City Centre. - Liverpool City Centre needs to be more accessible by public transport; better rail links essential including to the airport. - Diversify Liverpool City Centre’s activities and users and city centre living. - There is a contrast between the vibrancy/viability of Liverpool city centre and other centres across the city region. - Provide affordable retail accommodation and digital connectivity. - Safety of taller buildings and visual impact. - Housing associations can support town centre regeneration. There should be a recognition of key assets in the city centre. - Support diversification and adaption. 	
<p><u>Social and Cultural Facilities</u></p> <ul style="list-style-type: none"> - The loss of cultural facilities is a challenge. - Protect cultural assets and promote the culture and visitor economy. - Lack of leisure, health, education facilities and facilities for younger people. - Support for measures to promote social infrastructure in the city centre. - Need for diverse cultural offerings. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing objective, and suggested policy approach relating to Social Infrastructure.</p>

<p><u>Economy</u></p> <ul style="list-style-type: none"> - There is a lack of suitable office and business space. - Businesses require affordable trading and office space. - Too much focus on A-grade office space. - Promote and support local businesses. - Plenty of space allocated for business, but historic car-centric policies mean such spaces are inaccessible to large sectors of the community. - Support community led enterprise and co-operative initiatives focussed on ensuring local resilience to climate change. - Support business – tech and digital. - No consideration of health issues. - The Social Value Evaluation of the SDS should be consulted on. - More emphasis on social value, including how it will be increased and monitored. 	<p>Please see our current engagement, in particular our proposed Inclusive Economy, Health and Wellbeing and Social Value objectives. In addition, the SDS will be subject to a Social Value Assessment and we will be further considering our approach on this.</p> <p>At this stage we are not engaging on specific matters relating to the pattern, type and scale of development, including employment land. This will be covered in the next engagement stage in summer / autumn 2021.</p> <p>The Social Value Evaluation of the SDS has not been undertaken at this stage as there are no policies to review. The Social Value Evaluation will be undertaken when there is a more definite policy framework.</p>
<p><u>Transport</u></p> <ul style="list-style-type: none"> - Poor transport links are identified as a challenge. - Safe, accessible interconnected transport schemes can avoid car use. - Accessible cycle storage facilities. - Use electric charging points, electric cars via car clubs to improve countryside access. - Sustainable transport measures must be appropriately timed with any measures seeking to restrain city centre vehicular movement. - Connectivity for tourists and visitors is key to the city centre economy: focus on this. - Effective freight movement key to success of the city region: any changes to city centre vehicle movement needs to consider this. - Poor connectivity to employment sites. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing, Inclusive Economy and Placemaking and Communities objectives, and suggested policy approaches relating to Active Travel and Housing Standards.</p> <p>At this stage we are not engaging specifically on matters relating to transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Tourism and Heritage</u></p> <ul style="list-style-type: none"> - Heritage is underestimated and underutilised. - Protecting heritage can address a number of challenges. 	

<ul style="list-style-type: none"> - Visitor economy includes nature reserves. - Outlying regions should also be encouraged to enhance the visitor offer. - Need to conserve and enhance the historic environment and maximise opportunities from it. 	<p>Please see our current engagement, in particular our proposed Inclusive Economy and Placemaking and Communities objectives.</p> <p>At this stage we are not specifically engaging on matters relating to the visitor economy and heritage. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Location and Scale of Development</u></p> <ul style="list-style-type: none"> - Increase density of dwellings near transport hubs. - Supermarket and retail outlet ground level car parks should be redeveloped with multi storey dwellings and car parks. - Urban concentration supports vibrant economies and thriving businesses - Support residential development on edge of sustainable settlement locations to support nearby town centres and local community and social infrastructure. - Large residential sites support a greater range and diversity of population, and a greater range of retail and social infrastructure. - The SDS should maximise the potential of its unique assets such as the Port of Liverpool and Liverpool Airport. - There is an evidenced need for large scale industrial and logistics premises to accommodate the needs of the regional economy. - Brownfield sites can be of high biodiversity or geological value – should encourage its effective use provided it is not of high environmental value. - A spatial masterplan would ensure housing delivery efficiently responds to supply, demand and local requirements. 	<p>Please see our current engagement, in particular our proposed SDS objectives.</p> <p>At this stage we are not engaging on matters relating to the pattern, scale and type of development or transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Green Belt</u></p> <ul style="list-style-type: none"> - Delays in local plans and changing housing requirements are preventing sustainable sites from being released from the Green Belt. - Protect the Green Belt and all other open spaces. - Focus on town centres rather than the Green Belt. 	<p>At this stage we are not engaging on matters relating to development needs or town centres. This will be covered in the next engagement stage in summer / autumn 2021.</p> <p>In line with regulations, the SDS will not amend existing Green Belt boundaries.</p>

<p><u>Rural/Food</u></p> <ul style="list-style-type: none"> - Support farmers and local food networks. - There is a rural aspect to the region too. - Space for urban food growing as part of greening town and neighbourhood centres. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing and Inclusive Economy objectives, and suggested policy approaches relating to Healthy Food Businesses and the Rural Economy.</p>
<p><u>Flooding and Coast</u></p> <ul style="list-style-type: none"> - Sustainable drainage features contribute towards natural capital. - Use of water and coastal assets to boost economy. - Flood risk management and coastal defence schemes can provide regeneration opportunities. - Better water management of the canal could bring significant economic benefits. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested policy approach relating to the Natural Environment and Green Infrastructure.</p>
<p><u>Green Spaces</u></p> <ul style="list-style-type: none"> - Increase the quality and quantity of green and blue space to bring associated benefits. - Protect community greenspace, there has been losses of greenspace. - Improve access to green spaces and the countryside for everyone. - Bring the countryside into the City – deliver well-designed vibrant places with green corridors that strikes the right balance with jobs, homes, community infrastructure and the natural environment. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Placemaking and Communities objectives, and suggested policy approaches relating to the Natural Environment and Green Infrastructure and Design Quality.</p>

A Connected City Region

Summary of planning related comments	Our Response
<p><u>Vehicles</u></p> <ul style="list-style-type: none"> - Cars parked on pavements/footways cause obstructions. - Road congestion is a challenge and has a number of associated negative consequences. - Reliance on cars is a challenge. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Inclusive Economy objectives.</p>

<ul style="list-style-type: none"> - Encourage car free and car share only development schemes. - Restrict car parking in new development to essential users. - Part of the solution is the development of well-located, mixed use schemes that provide access to services other than by car. - New developments should provide a sufficient amount of car parking. - Restricting car access to town centres would encourage public transport use if services in place first. - Not just by car, but modern logistics operations and increase in trade is likely to result in some traffic growth. - Need safe and attractive alternatives to the car. - Repurpose road space for cleaner modes. - Adopt a policy of no new road building. - Better road links to take vehicles off roads. - Road traffic congestion affects economic performance, affecting investment and employment decisions. - More HGVs on the roads causing congestion and poor air quality. 	<p>At this stage we are not engaging specifically on matters relating to transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Public Transport</u></p> <ul style="list-style-type: none"> - Reliability of public transport deters people from using it. - Improve public transport. - Create more bus interchange points at supermarkets and secondary urban centres. - Integrate public transport and active travel routes. - Buses outside of centres should have provision for transport of cycles. - Clean, efficient, and affordable movement of people, goods, services and information is essential. - Improving sustainable transport connectivity, not just cycling and walking routes. - Better park and ride facilities (cars and bicycles). - Subsidising empty buses not a good use of public funding. Other opportunities should be explored such as promoting taxi use where public transport links are poor, or bus take up is low. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment, Health and Wellbeing and Inclusive Economy objectives, and suggested policy approaches relating to Active Travel and the Natural Environment and Green Infrastructure</p> <p>At this stage we are not engaging specifically on matters relating to transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>

<ul style="list-style-type: none"> - Look into feasibility of bus rapid transit along some sections of now disused railway. - Support for trams. - Use waterways for transport. 	
<p><u>Railways</u></p> <ul style="list-style-type: none"> - Poor rail connections are identified as a challenge. - Delver rail connections to the airport. - Improve vehicle parking at railway stations. - Increase electrification of the railways. - Development around train stations can help fund improved infrastructure. - High speed rail is key if Liverpool is to be considered as an investment destination. - More stations should be created, and bus services linked to them all. - Open up old rail systems. Make use of redundant rail infrastructure. - Make public transport clean, safe reliable and cheaper than car. - Unreliability of trains. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Inclusive Economy objectives.</p> <p>At this stage we are not engaging specifically on matters relating to transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Active Travel</u></p> <ul style="list-style-type: none"> - 'Not enough cycle lanes' was frequently tagged as a key challenge. - The quality, safety and attractiveness of footpaths and cycling provision varies considerably – tackling these should be a priority. - Double public transport use, cycling and walking within the next 10 years. - Use active design/encourage active travel. - Consider reallocating road space to other uses such as green space in suitable locations. - Promote social streets for improved mental health, active travel and better air quality. - Assess potential of blue and green infrastructure in terms of sustainable travel users. - Consider the impact of transport within the context of health and wellbeing. - Enhance historic streets so that they are safe and an enjoyable asset for the future. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Health and Wellbeing and objectives, and suggested policy approaches relating to Active Travel, Health Impact Assessments, and the Natural Environment and Green Infrastructure.</p>

<ul style="list-style-type: none"> - Streets that are safe and attractive places for people to live and work need to be the rule not the exception. 	
<p><u>Climate Change</u></p> <ul style="list-style-type: none"> - We can improve connectivity and reduce greenhouse gas emissions if we do not rely on road building or aviation. - Evidence suggests HS2 will lead to an increase in CO2. - Modal shift essential for the city region to perform well against climate change targets. - HS2 should include sustainable transport infrastructure from the outset. - If the combined authority is serious about tackling climate change, then aviation capacity cannot be increased. - Transport must be totally de-carbonised. - Transport infrastructure must be resilient to flooding and climate change. - Sustainable transport methods should be prioritised, including along water corridors. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested policies approaches relating to the Natural Environment and Green Infrastructure and Energy and Resources.</p> <p>At this stage we are not engaging specifically on matters relating to transport. This will be covered in the next engagement stage in summer / autumn 2021. Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Air Quality</u></p> <ul style="list-style-type: none"> - Poor air quality is a challenge in the city region. - Air quality has disproportionate effects on poorer communities and young people. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing objective, and suggested policy approach relating to Air Quality.</p>
<p><u>Town Centres</u></p> <ul style="list-style-type: none"> - Focus on town and village centres so that Council and NHS services can be built around them. - We should prevent out of town centres. - Create more intensified places and densities to support walkable local shops and facilities. - Land use and transport planning should be effectively integrated. 	<p>Please see our current engagement, in particular our proposed Inclusive Economy objective.</p> <p>At this stage we are not engaging on matters relating to the pattern, scale and type of development, which includes town centres. This will be covered in the next engagement stage in summer / autumn 2021.</p>

<p><u>Shipping and Aviation</u></p> <ul style="list-style-type: none"> - Consider the main challenge is unlocking the unique potential of international connectivity provided by Port of Liverpool and Liverpool Airport. - Improve surface access to the airport by both road and public transport. - Port and airport capacity and connectivity to them will be key to the success of Liverpool after Brexit, with free port status potential and increasing trade opportunities with North America. - Shipping and aviation emissions must be included in carbon budgets. - Airport expansion is contrary to climate change commitments even with improvements from technology. - The airport is too car dependent. - Port of Liverpool expanded without consideration on the impact on regional transport; expansion of rail freight should have been a prerequisite. - Issues relating to noise and air pollution need resolving. - Rail transport to Liverpool2 should be encouraged. - Sustainable development should be delivered at major infrastructure assets such as the airport and port. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Inclusive Economy objectives.</p> <p>At this stage we are not engaging on matters relating to the pattern, scale and type of development or transport. This will be covered in the next engagement stage in summer / autumn 2021.</p> <p>Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Infrastructure</u></p> <ul style="list-style-type: none"> - Instead of building more infrastructure build less – remove barriers. - Look at improving existing infrastructure first. - Ensure all modes are in all new infrastructure schemes and facilities are safe and fully accessible to all. - Infrastructure should form part of all new development both residential and employment. - Contributions from housebuilders to transport connectivity could be an SDS priority. - The SDS will ideally need to establish a hierarchy for development contributions. - Support transport improvements which minimises damage to the historic environment or where possible enhances it. 	<p>Please see our current engagement, in particular our proposed objectives.</p> <p>Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>

<ul style="list-style-type: none"> - Major infrastructure should seek to deliver appropriate mitigation and/or compensation for designated sites as well as strive towards delivery of biodiversity net gain. - A resilient and sustainable transport network is crucial. 	
<p><u>Digital Connectivity</u></p> <ul style="list-style-type: none"> - Improving digital connectivity is identified as a challenge. - Opportunities for homeworking should be encouraged through provision of high-speed internet and adaptable housing. 	<p>Please see our current engagement, in particular our proposed Inclusive Economy and Placemaking and Communities objectives, and suggested policy approaches relating to Digital Connectivity and Housing Standards.</p>
<p><u>Location/Strategy</u></p> <ul style="list-style-type: none"> - Focusing economic development in the most accessible locations will enhance town centre vitality and key gateway corridors. - Housing development must be located in places with sustainable transport links with current available public transport. - The strategy should set out, or strongly influence, how transport networks may need to change and how developments should be designed, located or laid out to achieve a significant change in preference of travel mode away from the private car. 	<p>Please see our current engagement, in particular our proposed SDS objectives.</p> <p>At this stage we are not engaging on matters relating to the pattern, scale and type of development or transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Accessibility</u></p> <ul style="list-style-type: none"> - Consider disability in all mobility types. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing, Inclusive Economy and Placemaking and Communities objectives.</p>

An Inclusive Economy

Summary of planning related comments	Our Response
<p><u>Employment</u></p> <ul style="list-style-type: none"> - A lack of high-quality jobs is a challenge in the city region 	

<ul style="list-style-type: none"> - Jobs outside of Liverpool City Centre are perceived as low paid and inaccessible by public transport. - Support local businesses. - Encourage businesses to the city region and provide high quality jobs. - Concerns about jobs that warehouses/logistics development provide. - The majority of high-quality jobs are located in our regional city centres. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Inclusive Economy objectives.</p> <p>At this stage we are not engaging on matters relating to the pattern, scale and type of development (including employment land and town centres) or transport.</p>
<p><u>Location and Scale of Development</u></p> <ul style="list-style-type: none"> - The cost of developing brownfield sites is a challenge. - Promote brownfield sites and protect the Green Belt and greenspaces. - Allow local authorities to decide whether they will adopt a brownfield first initiative. - Protect the biodiversity of brownfield sites. - Brownfield sites are more complicated and time consuming to deliver, an amount of greenfield land must be brought forward - A lack of suitable office space is a challenge. - The market is failing to deliver grade A offices at the pace required. - Land and premises for start-ups is an issue. - Ensure new employment opportunities are located in close proximity to new residential development. - Assess job growth accurately: unrealistic estimated will impact on housing need and put pressure on green spaces. - The digital economy must be encouraged to move to our towns. - Identify roles of settlements, key economic assets, employment corridors, tourism sectors, key infrastructure, and main areas of growth. - Clarify the relationship of the SDS with emerging Local Plans. - Focus development in areas with sustainable transport access. - Identify the impacts of growth on the SPAs. - SDS should identify an overall spatial strategy for the pattern, amount and quality of development. - The region needs to have broader objectives. - Ensure that expansions of developments, airport, and housing is met with appropriate transport connectivity. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Inclusive Economy objectives.</p> <p>At this stage we are not engaging on matters relating to the pattern, scale and type of development (including employment land) or transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>

<ul style="list-style-type: none"> - Invest in rail freight. - A policy for introducing logistics warehousing must be independently validated to ensure green spaces are not sacrificed unnecessarily. - There is a need to increase the number of large scale B2 and B8 sites that are well placed to support the Liverpool Superport initiative. - Criticism of sites identified and related approach in the SHELMA: a study should be conducted to examine all options for large B2 and B8 across the city region. - The Green Belt should not be an overriding impediment to the delivery of the sites to meet large scale B2 and B8 needs. - Evidence to establish the requirement for new B2 and B8 locations is necessary and should be accompanied by a call for sites. - The Mayor’s brownfield first approach might be premature if the evidence indicates that green field release may be required in the short term – viability assessment important. - Brownfield sites that have the potential to deliver a wide range of community benefits and ecosystem services. 	
<p><u>Transport</u></p> <ul style="list-style-type: none"> - A lack of public transport is a challenge. - Reopen stretches of rail for public access, connectivity and enjoyment. - There are rural roads in West Lancashire unsuitable for HGVs and congestion problems across the highway network. - Transport hubs should include facilities for charging bikes/wheelchairs/mobility scooters and cycle storage for adapted cycles. - Focus employment focused around transport nodes. - Encourage fully accessible sustainable transport. - Improve connections with North Wales. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Inclusive Economy objectives.</p> <p>At this stage we are not engaging on matters relating to the pattern, scale and type of development (including employment land) or transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Housing/Affordable Housing.</u></p> <ul style="list-style-type: none"> - A lack of suitable housing and housing affordability are identified as challenges. 	<p>Please see our current engagement, in particular our proposed Placemaking and Communities and Inclusive Economy</p>

<ul style="list-style-type: none"> - Focussing new development near community services, improving affordability of housing, and focussing new homes around transport hubs are identified as ways of dealing with challenges. - The SDS should establish an overall strategy for housing types and tenures. - Houses should be affordable to heat and run, built to zero carbon standards. - The standard method calculations should be the minimum number of homes needed –the SDS housing requirement needs to support city region economic growth ambitions. - The SDS need to be underpinned by studies by each of the six local authorities showing it is feasible to accommodate its own housing need. - SDS should set out who is responsible for addressing any housing shortfalls. - A better approach for affordable housing could be to specify an overall numeric target: devolve tenure types required to local authorities. - Need to increase affordable housing to meet the requirement and assessed need. - The Government’s Standard Methodology will restrict economic growth, decrease housing completions and weaken the local housing market. There are clear exceptional circumstances which warrant an alternative approach to the assessment of housing need for the city region. - Criticism of the City Region SHELMA – need an up to date and appropriate assessment of housing need. - There could be a requirement for a city region wide assessment of housing land supply and capacity and housing types. - Housing essential to unlocking inclusive growth. 	<p>objectives, and suggested policy approach relating to Housing Standards.</p> <p>At this stage we are not engaging on specific matters relating to the pattern, scale and type of development, including housing.</p>
<p><u>Community Services</u></p> <ul style="list-style-type: none"> - A lack community services is a challenge in the city region. - New development should be focussed near community services. - Need to explore how to optimise the conditions of the social economy. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing and Inclusive Economy objective, and suggested policy approaches relating to Social Infrastructure and the Social Economy.</p>

	<p>At this stage we are not engaging on specific matters relating to the pattern and scale of development. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Green Belt</u></p> <ul style="list-style-type: none"> - We should protect the Greenbelt. - Concern about green spaces and Green Belt land that has been lost to development. - Should consider whether exceptional circumstances exist to justify a review of current Green Belt boundaries. - If SDS excludes review of Green Belt boundaries, the SDS should make it clear that Local Plans must consider whether to undertake Green Belt review. - Carry out a housing and employment land assessment, if indicates a supply shortfall, conduct a strategic Green Belt review that at least identifies the most appropriate locations for land release. - Need to plan for a level of Green Belt release to meet needs. 	<p>At this stage we are not engaging on specific matters relating to development needs. In line with regulations, the SDS will not amend existing Green Belt boundaries.</p>
<p><u>Education/Skills</u></p> <ul style="list-style-type: none"> - Access to schools/colleges is a challenge in the city region. - Encourage training opportunities and improve quality and access to education. - There are no jobs for graduates: need to attract and retain graduates within the city region. - New development should focus on places with good access to schools. - Provide new schools within large housing developments. - The combined authority may wish to make education contributions a strategic priority alongside public transport. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing and Inclusive Economy objectives, and suggested policy approaches relating to Social Infrastructure and Employment Skills.</p> <p>At this stage we are not engaging on matters relating to the pattern and scale of development. This will be covered in the next engagement stage in summer / autumn 2021. Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Flooding/Water</u></p> <ul style="list-style-type: none"> - Need a consistent city region wide approach to water management, including on brownfield sites. - Flood and coastal erosion risk management supports an inclusive economy. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested</p>

	policy approach relating to the Natural Environment and Green Infrastructure.
<u>Digital Connectivity</u> <ul style="list-style-type: none"> - Ensure broadband connectivity to support flexible working facilities both in homes and employment sites. - More flexible ways of working should be factored into public transport. - Promote or provide subsidised remote working hubs. - Rural areas need accelerated rollout of high-speed broadband and reliable mobile coverage. 	Please see our current engagement, in particular our proposed Inclusive Economy and Placemaking and Communities objectives, and suggested policy approaches relating to Digital Connectivity and Housing Standards.
<u>Rural Economy</u> <ul style="list-style-type: none"> - Agricultural is a large employer in rural areas. - Agriculture and land management critical to tackling many city region challenges, support opportunities that may arise. - Improve public transport in rural areas. - Invest in roads to help food get to markets. - The city region is home to some of the most productive farming businesses in the UK, includes grade 1 land which is vital to UK food security. Loss of grade 1 land should only be seen as a last resort. - Impact of development on agricultural land, particularly in relation to flooding should be addressed. - City Region needs locally produced food, replace food and flowers flown in with locally grown produce. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Inclusive Economy objectives, and suggested policy approaches relating to the Natural Environment and Green Infrastructure and the Rural Economy.</p> <p>At this stage we are not engaging on matters relating to the pattern and scale of development or transport. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<u>Sports</u> <ul style="list-style-type: none"> - Income generated through sports participation and spectator events is decreasing as there is not enough sports pitch/facility provision to meet current and future demand. Potential loss of sports pitch/facility provision exacerbating existing and future demand. 	Please see our current engagement, in particular our proposed Health and Wellbeing objective, and suggested policy approaches relating to Active Travel and Social Infrastructure.
<u>Town Centre</u> <ul style="list-style-type: none"> - Develop specific local centre brands/personalities. 	Please see our current engagement, in particular our proposed Inclusive Economy objective.

<ul style="list-style-type: none"> - Focussing new development around town centres should not be at the expense of losing office space unless a surplus in the town centre has been identified. - New development should be focussed around town centres. - Community services and transport hubs need to be co-located and within easy reach of town centres. 	<p>At this stage we are not engaging on matters relating to the pattern, scale and type of development, which includes town centres. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Inequality</u></p> <ul style="list-style-type: none"> - Reliance on food banks. - Everybody should be able to access education easily. - Increase awareness of neurodiversity. - There is an immense disparity in wealth, health and wellbeing in the city region. - The city region economy cannot be inward looking. - An inclusive economy requires a better distribution of opportunity and with equal access to jobs and affordable homes. - Promote a mix of businesses in growth sectors and not be over reliant on imports and associated warehousing. 	<p>Please see our current engagement, in particular our proposed objectives.</p> <p>At this stage we are not engaging on specific matters relating to the pattern, type and scale of development. This will be covered in the next engagement stage in summer / autumn 2021.</p>
<p><u>Economy</u></p> <ul style="list-style-type: none"> - Focus more on climate research and technology. - Include aspects of the circular economy. - A challenge is how to achieve a just green economy. - There is an over emphasis on distribution centres/warehousing. - The historic environment can make a wide-ranging contribution to achieving an inclusive economy. - Establish clear, measurable strategic objectives for economic growth. - Recognise the need to prioritise the visitor economy as a driver of future sustainable employment. 	<p>Please see our current engagement, in particular our proposed Inclusive Economy, Climate Change and the Environment and Placemaking and Communities objectives.</p> <p>At this stage we are not engaging on matters relating to the pattern, type and scale of development (including employment land) or the visitor economy. This will be covered in the next engagement stage in summer / autumn 2021.</p>

The Infrastructure We Need

Summary of planning related comments	Our Response
<p><u>Transport Infrastructure</u></p> <ul style="list-style-type: none"> - Transport, rail, cycling, walking and blue/green infrastructure are considered necessary to support city region ambitions and priorities. - A major emphasis on energy efficient and integrated public transport is fundamental. - There is support for trams. - We need less road investment and should aim to avoid any increase in road capacity. - Priority should also be given to waterborne transport. - Need charging stations for e-bikes, wheelchairs and electric scooters. - Women needs to be involved in changes to infrastructure. - Do not expand without equivalent infrastructure. - Developing and expanding infrastructure throughout the city region and beyond into West Lancashire, Cheshire and Manchester. - Provide adequate road capacity. Resolve and reroute some road infrastructure – city centre congestion. - Reconfigure highway space to prioritise public transport, cycling and walking. - Tramlines are disruptive. - Look towards Wales and Ireland through improved rail, road and short and deep-sea links. - Safe accessible sustainable transport schemes for walkers, cyclists and equestrians and safe routes to schools. - Provide a rail network to the airport. - Utilise redundant rail infrastructure for light rail schemes. - Improve and expand rail services, including rail freight, providing multi storey car parks, rail electrification and hydrogen powered trains. 	<p>Please see our current engagement, in particular our proposed objectives.</p> <p>At this stage we are not engaging on matters relating to the pattern, type and scale of development. This will be covered in the next engagement stage in summer / autumn 2021. Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Renewables/low carbon</u></p> <ul style="list-style-type: none"> - Renewable energy/low carbon infrastructure is considered necessary to support city region ambitions and priorities. - Rapid growth in renewable energy is needed. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested policy approach relating to Energy and Resources.</p>

<ul style="list-style-type: none"> - Barrage concerns - impact on ecosystems, the Mersey, and embedded carbon in its development and operation. - A barrage system could provide flood and water management, a cycle, pedestrian, road or rail link. - Renewable energy infrastructure on offices, warehouses and houses. - Renewable energy is a matter best addressed through the Building Regulations. - The city region is at the centre of a potential pioneering hydrogen economy, but there are environmental concerns. 	<p>Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Social Infrastructure</u></p> <ul style="list-style-type: none"> - Education and health facilities and leisure infrastructure are considered necessary to support city region ambitions and priorities. - There are deficiencies in indoor and outdoor sports provision across the City Region. - Safe play areas for children walkable from home. - Leisure infrastructure would support city region ambitions and priorities. - Lack of public restrooms. 	<p>Please see our current engagement, in particular our proposed Health and Wellbeing objective, and suggested policy approach relating to Social Infrastructure.</p> <p>Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Green/Blue Infrastructure</u></p> <ul style="list-style-type: none"> - Blue/green infrastructure is considered necessary to support city region ambitions and priorities. - The region's rivers and waterways are a vital public asset. - Green infrastructure has a role in both adaption and mitigation to climate change, reducing wildlife impacts and promoting health and wellbeing benefits. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested policy approach relating to the Natural Environment and Green Infrastructure.</p> <p>Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Climate Change and the Environment</u></p> <ul style="list-style-type: none"> - Avoid infrastructure contributing to climate change, adversely impacting the environment and communities. - Planning of infrastructure has to be in the context of carbon budgets without reliance of carbon offsetting and in line with the climate emergency and carbon reduction pathway. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Placemaking and Communities objectives, and suggested policy approaches relating to the Natural Environment and Green Infrastructure and the Social Economy.</p>

<ul style="list-style-type: none"> - Must be zero carbon without unfairly resorting to outsourcing emissions. - We need facilities to support social enterprise development. - Infrastructure should seek habitat creation and/or enhancement opportunities. - Infrastructure should be adaptable to climate change. - Invest in flood and coastal infrastructure to ensure the city region resilience, with association regeneration/economic benefits. - Flood and water management is considered necessary to support city region ambitions and priorities - Development should incorporate innovative solutions to flood risk. - Development should ensure sustainable drainage. 	<p>Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Shipping and Aviation</u></p> <ul style="list-style-type: none"> - Improve access to the airport. - Infrastructure investments to the runway and passenger facilities to unlock important international connectivity. - Regional airports reduce cross channel and UK road network freight movements. - Develop unique resources of the airport and seaport to the maximum benefit of the region. - Support the expansion of the Port of Liverpool, including with strategic infrastructure, and identify Manchester Ship Canal as a strategic freight corridor. - Rail transport to the port and associated improvements. - Need to balance the benefits and costs of the Port- environmental harms from ships. - Use rail to move containers. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment and Inclusive Economy objectives.</p> <p>At this stage we are not engaging on specific matters relating to the pattern, type and scale of development or transport. Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Spatial</u></p> <ul style="list-style-type: none"> - Review and identify settlements with the most sustainable level of existing infrastructure and thus best placed to support growth. - New residential development on the edge of existing sustainable settlements supports various infrastructure and existing utilities. 	<p>At this stage we are not engaging on specific matters relating to the pattern, scale and type of development (including housing). Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>

<p><u>Digital</u></p> <ul style="list-style-type: none"> - Digital connectivity is considered necessary to support city region ambitions and priorities. - Full fibre connections should be required for all new developments to facilitate economic growth and home working. - Improved high speed broadband infrastructure for the more rural areas of the region. - Digital connectivity is a matter best addressed through Building Regulations. 	<p>Please see our current engagement, in particular our proposed Inclusive Economy and Climate Change and the Environment objectives, and suggested policy approaches relating to Digital Connectivity and Energy and Resources.</p> <p>Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Utilities</u></p> <ul style="list-style-type: none"> - Current infrastructure limits choice of utilities providers. - Further investment needed in the resilience of our energy distribution networks and water/wastewater systems. - Disproportionate growth in any settlement has the potential to place a strain on existing water and wastewater infrastructure. - Pressure on sewers and flood defence infrastructure. 	<p>Infrastructure will be addressed as part of a Strategic Infrastructure Plan.</p>
<p><u>Minerals and waste infrastructure.</u></p> <ul style="list-style-type: none"> - Delivery of sustainable waste infrastructure is critical for the future competitive and carbon performance of the city region. - Need to recognise the city region role in assisting in the supply of minerals. 	<p>Please see our current engagement, in particular our proposed Climate Change and the Environment objective, and suggested policy approach relating to Energy and Resources.</p>