



# We Asked, You Said, We Did

**Summary of responses received during LCR Listens: Our Places (Stage 2) of the Spatial Development Strategy and their outcomes.**

Engagement between November 2020 and February 2021.



## Green Infrastructure

### YOU SAID:

#### Green Infrastructure

- Ensure green infrastructure is planned, designed, and managed in an integrated way to achieve multiple benefits and advantages.
- Agree with the idea of identifying the main components of a green infrastructure network to preserve and improve priority ecosystems.
- May also serve as a foundation for ensuring biodiversity net gain via development, which can be aligned with other objectives such as supporting sustainable urban drainage.
- Emphasise the need and value of connectivity between environmental assets, open spaces, and biodiversity hotspots as part of a larger, connected network.
- Minimise habitat fragmentation to provide community benefit to emphasise the need for a network approach to green infrastructure.
- Recommend that the relationship between sustainable drainage and other advantages of green infrastructure is clearly referenced.
- Does not consider the specific role and function of playing fields, which are included in the Green Infrastructure definition.
- Do not support the policy approach as currently drafted.

### WE DID:

Integrating green infrastructure for multiple benefits including playing fields, focusing on priority ecosystems, biodiversity net gain and connectivity has been addressed in **LCR SP6 Green and Blue Infrastructure** and **LCR DP7 The Natural Environment and Nature Recovery**.

The relationship between the natural environment and sustainable drainage has been addressed in LCR DP13 Water Management and Flood Risk.

## YOU SAID:

### Natural Capital

- Valid reservations about the approach to Natural Capital but risk perpetuating the idea that nothing has fundamental worth; challenge to demonstrate how benefits of considering the environment can be made fairly.
- Natural capital concept should be applied with caution.
- May justify the continued use of fossil fuel deposits which are considered natural assets and ‘commodify’ natural resources.
- Natural Capital provides a practical and measurable method of valuing green spaces and biodiversity.
- Natural capital approach is just one tool to use.
- Risks and limitations must be addressed, such as the fact that it generates more maps and consulting and reacts to the market rather than fully integrating the circular economy.
- Interested about the natural capital and the prospect of offering environmental credits or offsite upgrades in places where onsite supply isn’t viable.
- Natural capital data should be more widely published and accessible to the general public and be updated on a regular basis.

## WE DID:

The method of valuing green space and biodiversity through Natural Capital have been addressed in **LCR SP6 Green and Blue Infrastructure** and **LCR DP7 The Natural Environment and Nature Recovery**.

YOU SAID:	WE DID:
<p><b>Language and Wording</b></p> <ul style="list-style-type: none"><li>• Language needs to be simpler but strengthen its commitment and intent.</li><li>• Further clarification is needed on the point ‘reinforcing’ protection.</li><li>• Should set out the distinction between international, national, and local designation.</li></ul>	<p>Where possible the content has been simplified.</p>

## YOU SAID:

### Tree Planting

- Generally supportive of policy approach and its recognition of the role of Mersey Forest within the City Region.
- Local planning authorities should identify areas for strategic tree planting and woodland creation.
- Consider that the lasting management of tree planting is beyond the remit of planning.
- Important the right trees are planted in the right place by encouraging local genotypes and better-rooted trees better able to withstand extreme weather and other stresses.
- Clarification is needed whether strategic tree planting and/or woodland creation will be required in addition to biodiversity gain for developers.
- Policy does not go far enough to seek prevention of tree clearance for development.
- Other natural carbon sinks such as peat lands, marine environments should also be covered.
- Should acknowledge time-lag between planting trees and its effectiveness as carbon sink.
- Tree planting should not occur on playing fields.
- Set out where tree planting is and is not appropriate.

## WE DID:

The recognition of the importance of trees have been addressed in **LCR SP6 Green and Blue Infrastructure**. In addition, preventative measures for loss or damage of trees and woodland have been set in **LCR DP7 The Natural Environment and Nature Recovery**.

In relation to tree planning falling outside of the remit of planning, the Combined Authority will look to the Environment Act (2021) for the range of measures to support trees and woodland. Tree planting will support the delivery of the government's expectations on biodiversity and other environmental outcomes.

The Combined Authority will work with Mersey Forest and other partners in support of strategic initiatives to deliver increased tree cover, in line with the emerging Local Nature Recovery Strategy.

## YOU SAID:

### Biodiversity

- Overall support with approach of protecting, conserving, and enhancing sites of biodiversity and geodiversity value and designated European sites.
- Policy should seek to ‘reverse’ biodiversity loss.
- Recognition for the several areas of overlap (including protected areas, geodiversity, biodiversity, green infrastructure, water quality and climate change) and their cross-boundary nature.
- Acknowledge that it is not always practical or viable to meet biodiversity requirements on site.
- Wish to see a specific policy on biodiversity and made a priority.
- Further clarification needed to address biodiversity as key function of green infrastructure.
- Should help housebuilders meet their environmental and biodiversity obligations.
- Offering protections if necessary, as this would have many positive outcomes including costs and biodiversity, the aesthetic and quality of life/wellbeing benefits and protection of essential pollinators.

## WE DID:

The requirement for biodiversity improvements is set out in **LCR DP7 The Natural Environment and Nature Recovery**.

The Natural Environment and Rural Communities Act 2006 sets the biodiversity duty to ensure due regard to the conservation of biodiversity. Section 40 of the Act places a duty to conserve biodiversity on public authorities in England.

## YOU SAID:

### Policy Approach

- Generally supportive of policy direction.
- Expect to see actions outlined on how the policy will be delivered.
- Measurable gain will need to be adopted and properly understood.
- Policy approach should ensure that the onus is upon the planning authority to establish at an early stage the objectives and identify the key assets for preservation and enhancement.
- Co-ordinated work should then take place on protecting and improving these shared assets across the City Region.
- Disagree with the approach due to concerns about how it will be applied in practice, especially in terms of 'how' it is being done and the 'who' involved in committees and decision-making.
- Policy approach suggests a lack of synergy and integration of the relationship between natural capital, nature recovery strategies, biodiversity net gain and green infrastructure.
- Important that the policy provides a clear spatial and policy framework for investment, planning and delivery.
- Policy is generally high-level but needs to be evidence based and would not impede sustainable and acceptable development proposals.

## WE DID:

Concerns regarding the implementation and practical application have been taken into consideration. Please refer to our current engagement and the relevant proposed policy approaches.

YOU SAID:	WE DID:
<ul style="list-style-type: none"><li>• Will help housebuilders meet their environmental and biodiversity obligations.</li><li>• Ambition for developments on unimpeded sites (i.e. brownfield sites of limited ecological or green infrastructure value) to contribute towards a regional Capital, then the basis to do so must be established and justified.</li><li>• An overarching policy to tackle all Climate Change contribution is the best approach to adapting to the impacts of a shifting climate.</li><li>• Co-ordinated work can protect and improve these shared assets.</li><li>• Explicitly outline intention to implement policy objectives at a city region or landscape scale and how they can be operationalised at a City Region level.</li><li>• Expand to show how it might be applied in the context of sites which would directly impact upon relevant assets and other proposals which would only have indirect effects on a strategic basis.</li><li>• National focus on protecting soils, restoring peatland, and increasing woodland cover as part of the Climate Emergency should be developed further.</li></ul>	



## YOU SAID:

### Environment

- Value of the environment needs to be front and centre stage.
- More emphasis should be on the quality of life being innately linked with the quality of our environment.
- Emphasise the role of the natural environment in mitigating and adapting to climate change e.g. carbon storage from coastal habitats, wetlands/peatlands, and woodland.
- Difficult to see how benefits of considering the environment can be made fairly.
- Must take a positive and realistic approach to baseline assessment of natural assets.
- Must not place undue value on, or requirements on developments to improve land which is of little environmental value now.
- Greenfield land which has low social and environmental value should be used to its best effect and where appropriate for development.
- Land should be afforded protection in accordance with its actual value which must be established through a robust evidence base.
- Policy does not go far enough to contribute to immediate carbon reduction.
- Needs to focus less on economic growth and more on environmental justice and more fair distribution of resources to tend to land with a stronger land ethic relating to ecological principles.
- Enhancement (not just protection) of the natural environment should be a requirement of all development and not just about limiting damage.

## WE DID:

The prioritisation of the environment's value, with a focus on quality of life and its role in mitigating climate change have been addressed in **LCR DP1 Planning for Climate Change**.

The enhancement of the natural environment and appropriate mitigation measures to minimise negative impacts have been addressed in **LCR DP7 The Natural Environment and Nature Recovery**.

## YOU SAID:

### Nature and Wildlife

- Belief that a policy is not always necessary to manage the natural wildlife and should be left alone and consider whether any areas could be left to nature altogether.
- Policy needs to be underpinned by Local Nature Recovery Strategy with involvement from Natural England.
- Need to support enhancements in a wide range of natural habitats, beyond trees and woodlands, to include meadows and grasslands, river catchments, wetlands, dune systems, hedgerows and gardens, and a responsibility to care for habitats and living creatures.
- Policy approach should emphasise that the natural environment is an integrated whole and the health and environmental benefits of creating nature and wildlife corridors to allow wildlife to thrive in the city between urban green space, the wider rural environment, and the coast.
- Woodland creation should also include woodland restoration, regeneration and creation and management of a variety of habitats including wetlands and grasslands.
- Wildlife corridors are essential for protecting migrating wildlife.
- Hedgerows and woodland should be maintained.
- Netting should not be permitted by developers in any circumstances as that traps and harms nesting birds.
- If the policy is to seek to address scenarios wider than direct impacts upon priority habitats, then its logical premise and its criterion-led approach to doing so must be identified at an early stage.
- SSSIs should be protected.
- Development gain should be used to encourage the protection of endangered species e.g. red squirrel, and the re-introduction of appropriate lost species e.g. pine martins, beavers.
- Incorporate and expand on the current policy as part of a Nature Recovery Strategy for the LCR.

## WE DID:

The emphasis on integrated nature of the natural environment and creating nature corridors for wildlife, in addition to protecting species, encouraging development gain, and integrating into a Nature Recovery Strategy for the LCR have been addressed in **LCR SP6 Green and Blue Infrastructure** and **LCR DP7 The Natural Environment and Nature Recovery**.

YOU SAID:	WE DID:
<p><b>Engagement and Initiatives</b></p> <ul style="list-style-type: none"> <li>• Mapping should include local people and activate the City Region’s strong social and cultural networks.</li> <li>• Urge the Combined Authority to work with Nature Connected to develop policy area on Biodiversity Net Gain.</li> <li>• Ways of working with City Region partners such as NML to ensure that every child has experiences close to nature and understands the key aspects of climate change.</li> <li>• Community involvement in tree planting and community management of green spaces (with resources provided to do so).</li> <li>• Incentives for innovations to shift environmental inequalities and increase biodiversity, air and water quality should be given to businesses and penalties too, specifically in relation to tenders and suppliers.</li> <li>• More work on contracting which improves environmental measures rather than investment in expensive paving slabs.</li> </ul>	<p>In addition to this live engagement, the SDS has carried out two stages of non-statutory public engagement and commits to engaging again at the statutory stage providing opportunity to shape and influence the plan at the very early stages and throughout its development.</p>
<p><b>Active Travel</b></p> <ul style="list-style-type: none"> <li>• Incorporating green space into active travel routes and sustainable public transport to encourage uptake.</li> <li>• Access to green spaces for communities ensuring that people can access green infrastructure by foot/cycle.</li> </ul>	<p>The relationship between active travel and green space have been addressed in <b>LCR DP10 Sustainable Transport and Travel, LCR DP1 Planning for Climate Change</b> and <b>LCR DP6 High Quality Design</b>.</p>

## YOU SAID:

### Non-planning related matters

- More investment in working with farmers to create local supply chains of healthy food.
- Free public transport.
- Encourage active/public transport use to access green spaces for example council tax reward system for reduced use of private transport.
- Limit import through docks of globally damaging products (e.g. carbon intense fuels such as biomass for Drax, Soya from deforested areas of Brazil).
- Disabled / blue badge parking bays must have a place in schemes like this and be policed (traffic wardens etc) to prevent misuse.
- Investment in Earth Sciences.
- At the City Region level, the natural capital approach and the Year of the Environment were too exclusive and exclusive to the business and environmental sectors.
- Active resistance should cover all city region sub-contractors and agencies, such as Merseyrail.
- Maintaining walls and paths and keeping areas safe.
- Better management is needed to protect local areas and avoid if possible, fly tipping and irresponsible people who litter and let dogs foul any pavements.
- Specific policies addressing excessive mowing and spraying or road verges and traffic islands etc.

## WE DID:

We would like to take this opportunity to thank you for comments. However, these are matters which cannot be directly influenced by the SDS.

YOU SAID:	WE DID:
<p><b>Monitoring</b></p> <ul style="list-style-type: none"> <li>Concerns that monitoring will not necessarily ensure that outcomes will be reached.</li> </ul>	<p>The SDS will be accompanied by a monitoring framework which sets out monitoring indicators that will be reported on the progress made on the preparation and implementation of the SDS. Upon adoption of the SDS, Authority Monitoring Reports will be published to show the progress made and can help inform if an update is required of the SDS.</p>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>The protection and enhancement of the many heritage assets associated with waterbodies and man-made waterways should also be included.</li> <li>Heritage assets are often an important element of green infrastructure.</li> </ul>	<p>Heritage assets have been addressed more widely in <b>LCR SP9 Culture, Tourism and Visitor Attractions</b> recognising its importance with green and blue infrastructure.</p>
<p><b>Environment</b></p> <ul style="list-style-type: none"> <li>Set out the hierarchy of protected sites across the city region.</li> <li>Policies that focus on outcomes that deliver for nature, climate, and food production.</li> <li>Seek to address the adverse environmental impact on our green spaces, and high carbon footprint, of dog ownership.</li> <li>Focus on leaving the land and the environment in a better state for future generations such as Wales national policy.</li> <li>Protect all-natural carbon sinks – peat lands, marine environment etc.</li> <li>The impact of the docks on the local environment and a rethink of the access to the port.</li> </ul>	<p>Establish protected sites hierarchy, prioritise nature, climate, and food production have been addressed in <b>LCR SP10 Rural City Region, LCR DP1 Planning for Climate Change</b> and <b>LCR DP7 The Natural Environment and Nature Recovery</b>.</p>

YOU SAID:	WE DID:
<p><b>Sports and recreation</b></p> <ul style="list-style-type: none"> <li>• Consider sport and recreational value of greenspaces and playing fields.</li> </ul>	<p>The enhancement and provision of the City Region’s network of public open spaces, playing fields, outdoor sports and recreation facilities have been addressed in <b>LCR SP6 Green and Blue Infrastructure</b> and <b>LCR DP4 Promoting Health and Wellbeing</b>.</p>
<p><b>Marine environment</b></p> <ul style="list-style-type: none"> <li>• Should mention the marine environment and marine planning.</li> <li>• Ensure the beach and waterfront is protected from harmful development.</li> </ul>	<p>The marine environment has been addressed in <b>LCR SP6 Green and Blue Infrastructure</b> and <b>LCR SP8 River Mersey and the Coast</b> with particular reference to the city region’s coast and waterfront.</p>
<p><b>Natural environment and biodiversity</b></p> <ul style="list-style-type: none"> <li>• Wildlife and their homes need to be protected.</li> <li>• Other carbon-fixing habitats should be protected and increased.</li> <li>• Incorporate and expand on the current policy as part of a Nature Recovery Strategy for the LCR.</li> <li>• Suggested wording provided covering: BNG targets commitment (higher on Council owned land), updating ecological network, establishing Nature Recovery Network.</li> <li>• Creating spaces in farmland for more tree cover, planting of wildflower meadows.</li> <li>• Policy approach should be to identify and protect spaces from human interference and giving fuller protection to SSSIs and RAMSAR sites.</li> </ul>	<p>The importance and protection for wildlife, increasing carbon-fixing habitats and implementing a Nature Recovery Strategy for the city region have been addressed in <b>LCR SP6 Green and Blue Infrastructure</b> and <b>LCR DP7 The Natural Environment and Nature Recovery</b>.</p>

YOU SAID:	WE DID:
<p><b>Natural habitats</b></p> <ul style="list-style-type: none"> <li>• Policy needs to support enhancements in a wide range of natural habitats, beyond trees and woodlands, to include meadows and grasslands, river catchments, wetlands, dune systems, hedgerows, and gardens.</li> <li>• City region’s coastline and landscapes are important and much valued assets which should be protected and enhanced as part of the overall approach.</li> <li>• Policy approach should also be extended to wildflower meadows, hedge planting, wetland creation, and rewilding in both urban and rural contexts.</li> </ul>	<p>Support for natural habitat and protection for the coastline have been addressed in <b>LCR SP6 Green and Blue Infrastructure</b> and <b>LCR SP8 River Mersey and the Coast</b>.</p>
<p><b>Water Management</b></p> <ul style="list-style-type: none"> <li>• Poor drainage can be problematic when it leads to flooding of public parks.</li> <li>• Housing targets for Local Planning Authorities may need to be redistributed if land is constrained owing to flooding issues.</li> <li>• Consideration of flood-risk and other environmental matters may have a direct bearing on the subsequent spatial patterns of development.</li> <li>• Historic environment should be conserved and enhanced as part of water management strategies.</li> <li>• Strategic approach to water management, flooding and flood risk is welcomed.</li> <li>• Reference should be made to flood and coastal resilience in relation to climate change.</li> <li>• Policy should have more emphasis on the integration of blue and green infrastructure and go further than flood risk management.</li> <li>• Highlight the huge natural benefit of good quality water bodies, from wetlands, through natural rivers, managed canals, and the sea.</li> </ul>	<p>Addressing flood risk, conserving heritage, and integrating blue and green infrastructure to achieve for sustainable development have been addressed in <b>LCR DP13 Water Management and Flood Risk</b>.</p>

## YOU SAID:

### Greenspace

- Access to greenspace should also include and promote allotments and community growing spaces.
- Policy to specifically take a stance against the destruction of existing green spaces.
- Set out approach to the provision of accessible natural greenspace e.g. adopting the Accessible Natural Greenspace Standards (ANGSt).
- Supportive of the policy approach of reinforcing the protection of the City Region's network of green and open spaces and promote its improvement.
- 'Improvement' should be carefully considered and defined.
- Supportive of ensuring new provision is accessible to communities and is of a high standard with lasting management in place.
- Access to green space and the environment should be at the centre of all considerations in town planning.
- Impact of Covid-19 lockdowns has highlighted the importance of access to green space and its impact on health and wellbeing.

## WE DID:

The importance of access to greenspace have been addressed in **LCR SP6 Green and Blue Infrastructure**.

The protection and enhancement of green spaces have been addressed in **LCR DP7 The Natural Environment and Nature Recovery**.

The assessment of open space is typically done at a local level; therefore, we expect to see this within the Local Plans.

The importance of access to green spaces for health and wellbeing, together with the support for allotments and community growing spaces, have been referenced in **LCR DP4 Promoting Health and Wellbeing**.



## YOU SAID:

- Access to green space is an inequalities issue.
- Fly-tipping is a major barrier to access, as well as being adversely impacted by the docks.
- Concerns about how quality of open space will be determined and maintain it.
- All development should seek to maximise both public and private green space, by minimising as far as possible the sealing of the natural ground surface, and encouraging the development of green roofs, green walls, and other means where appropriate.
- Policy must ensure that green spaces are valued, managed, and protected to promote biodiversity in all areas, not just wealthier areas of the City Region.
- Management of public greenspaces should be done to enhance as broadly as possible without recourse to pesticides and herbicides and to encourage wilding.
- City Region green space possibly being released for building does not align with a green and environmental strategy or the proposed policy.
- Policy approach should actively resist the destruction of existing green space and seek nonpartisan stakeholder involvement in seeking innovative natural and green solutions to any proposals.

## WE DID:

YOU SAID:	WE DID:
<p><b>Other Policy Considerations</b></p> <ul style="list-style-type: none"> <li>• Insufficient focus on the coastal and marine environment.</li> <li>• There are several areas of overlap including protected areas, geodiversity, biodiversity, water quality and climate change.</li> <li>• Would welcome opportunities to enhance and support Bold Forest Park.</li> <li>• First bullet point - whilst supported in principle any development or change of use on a playing field that incorporates other uses would need to meet national policies.</li> <li>• Should be a strategic policy setting out the principle and over-arching policy commitment to managing recreation pressure on the LCR coast.</li> </ul>	<p>Following on from the previous engagement, new policy areas have emerged from the feedback received. Of relevance, please refer to <b>LCR SP8 River Mersey and the Coast.</b></p>
<p><b>Agricultural Land</b></p> <ul style="list-style-type: none"> <li>• Important that the value of agricultural land is recognised and retained as a productive and natural landscape.</li> </ul>	<p>The importance of agricultural land has been addressed in <b>LCR SP10 Rural City Region.</b></p>
<p><b>Liverpool City Region Specific</b></p> <ul style="list-style-type: none"> <li>• LCR Land Commission should seek more access to public footpaths and work with landowners on large-scale restoration projects, with a focus on sustainable skills and jobs.</li> <li>• Inappropriate and unreasonable to identify sites after the plan-making stage or place unreasonable obligation on applicants in connection with non-designated or non-allocated sites.</li> <li>• Opposition to the building of a new road through Rimrose Valley to improve the Port of Liverpool access.</li> </ul>	<p>The comments have been shared with the appropriate Lead Officers within the Combined Authority who deal with these areas and are appreciated.</p>

### YOU SAID:

#### Low Carbon Economy

- Supportive of the policy approach of identifying the opportunity to deliver economic growth and minimising its net carbon demand, especially during construction, through operation and regarding-whole life costs.
- Spatial distribution of housing, strategic growth allocation with sustainable location should be located where low carbon energy production if possible.
- ‘Low carbon energy’ should be expanded to indicate genuine low carbon energy provision through the planning process on the basis of carbon capture and storage technology being available in the future.
- Greater transparency is needed over the need to reduce consumption overall.
- Should identify strategic opportunities for low carbon energy production and waste management.
- More coverage of materials resources issues including how spatial development can support behaviours aligned with the transition to a more circular, low carbon economy and the achievement of Zero Waste 2040.

### WE DID:

Minimising net carbon demand, identifying opportunities for economic growth, allocating sustainable housing, expanding low carbon energy provision, increasing transparency, identifying strategic opportunities, and addressing material resources issues for circular economy transition have been addressed in **LCR DP1 Planning for Climate Change, LCR DP11 Energy** and **LCR DP12 Resources** and **LCR DP8 Making the Best Use of Land**.

In addition, please refer to the **LCR SS1 Liverpool City Region Spatial Strategy** which addresses the spatial distribution.

YOU SAID:	WE DID:
<p><b>Circular Economy</b></p> <ul style="list-style-type: none"> <li>• Policy approach should be more strongly aligned with the concept of circular economy.</li> <li>• Does not go far enough in its approach to result in consumption reduction.</li> </ul>	<p>Promoting and facilitating the move towards a circular economy have been addressed in <b>LCR DP1 Planning for Climate Change</b> and <b>LCR DP12 Resources</b>.</p>
<p><b>Resource Efficiency</b></p> <ul style="list-style-type: none"> <li>• Strong support for a policy approach that would see materials that are recycled or sustainable.</li> <li>• General agreement that resource efficiency in building and construction is important but should not seek to control building standards which are properly controlled by legislation outside of the planning system.</li> <li>• Currently no means to require developers to use recycled or sustainable building materials.</li> <li>• Issues were highlighted about how this would be dealt with within or outside of the planning system.</li> <li>• Measures introduced beyond legislative requirements outside of the planning system should be clearly reasoned and evidenced and costs fully accounted for.</li> <li>• Resource efficiency should include both the materials used in the construction and the design of the building, as well in other sectors such as manufacturing and production too.</li> <li>• Spatial planning and land use should consider ease and access of preventing waste, reuse, share, repair, or recycling resources, though will require innovation in terms of how people use and interact with materials.</li> </ul>	<p>The consideration for waste prevention and resource reuse have been addressed in <b>LCR DP11 Energy</b> and <b>LCR DP12 Resources</b>.</p>

YOU SAID:	WE DID:
<p><b>Natural Environment</b></p> <ul style="list-style-type: none"> <li>• A commitment to minimise impacts on the natural environment through better use of energy and resourcing would be welcomed.</li> </ul>	<p>Support for renewable energy and infrastructure, considering adverse impacts on the natural environment has been addressed in <b>LCR DP7 The Natural Environment and Nature Recovery.</b></p>
<p><b>Renewable Energy</b></p> <ul style="list-style-type: none"> <li>• Policy approach to offshore wind generation is welcome, though subject to rigorous Environmental Impact Assessment.</li> <li>• Policy approach should focus on available and immediate means to reduce carbon through wind, solar, ground energy resources rather than carbon capture and storage, a concept still in its infancy and emerging technology.</li> <li>• General desire for renewable energy targets rather than a broader-based approach with reference to reductions in net carbon demand relative to a base case “standard building”</li> <li>• Issues with biomass energy generation as it is not currently harvested from ‘sustainable sources’ and whether it is low/zero carbon is disputed.</li> <li>• Policy approach should focus on proactively supporting renewable energy such as solar and wind farms.</li> <li>• Hydrogen is rarely a ‘clean’ fuel and should not be presented as such given that 95% of hydrogen generation globally is ‘grey’ (from fossil fuels with resultant emission of greenhouse gasses).</li> </ul>	<p>Focus on renewable sources, addressing environmental impact and promoting sustainable energy sources have been addressed in <b>LCR SP8 River Mersey and the Coast</b> and <b>LCR DP1 Planning for Climate Change</b> and <b>LCR DP11 Energy.</b></p>

YOU SAID:	WE DID:
<p><b>Development</b></p> <ul style="list-style-type: none"> <li>• General discouragement for specific requirement on percentile renewable energy from development. Should instead demonstrate a material reduction in net carbon demand using appropriate approaches and technologies.</li> <li>• Ambitions to enhance recycling presentation rates and the re-use of buildings (and building materials) are highly consistent with these broad ambitions.</li> <li>• Consideration needs to be given to the risks posed by past coal mining activity when allocating sites for future development and safeguarding resources.</li> <li>• The application of a policy based upon minimum renewables is unlikely to align with the best opportunity to reduce net carbon demand through new development.</li> </ul>	<p>Emphasis on recycling, reusing materials, considering coal mining risks, and focusing on net carbon reduction have been addressed in <b>LCR DP1 Planning for Climate Change, LCR DP11 Energy and LCR DP12 Resources.</b></p>
<p><b>Housing and Buildings</b></p> <ul style="list-style-type: none"> <li>• Buildings need to be fit for the future which in turn reduce carbon emissions and provide green open space where appropriate.</li> <li>• This included homes, public buildings, community, commercial and industrial buildings.</li> </ul>	<p>Future-proofing buildings to reduce carbon emissions and providing green spaces have been addressed in <b>LCR DP1 Planning for Climate Change and LCR DP11 Energy.</b></p>
<p><b>Waste Management and Resourcing</b></p> <ul style="list-style-type: none"> <li>• Waste management plays a key role in reducing energy and resourcing and solutions must be environmentally friendly.</li> <li>• Support for the approach of meeting targets in alignment with the Merseyside and Halton Joint Waste Local Plan and reinforcing the need to safeguard mineral resources and associated supply infrastructure.</li> <li>• Identifying strategic opportunities for low carbon energy production and waste management will also be important for the spatial distribution of housing.</li> </ul>	<p>Waste management for energy reduction, alignment with Merseyside and Halton Joint Waste Local Plan, and identifying opportunities have been addressed in <b>LCR SP4 Strategic Infrastructure, LCR DP1 Planning for Climate Change and LCR DP12 Resources.</b></p>

YOU SAID:	WE DID:
<p><b>Transport</b></p> <ul style="list-style-type: none"> <li>Investment into transport systems which reduce car usage and demand is critical to reducing demand on energy and resourcing.</li> </ul>	<p>Reducing car usage and demand have been addressed in <b>LCR DP1 Planning for Climate Change</b> and <b>LCR DP10 Sustainable Transport and Travel</b>.</p> <p>As a Combined Authority, projects have been identified through the Strategic Investment Fund to foster smart, sustainable, and inclusive growth across the city region.</p> <p>The Combined Authority is also delivering a £710 million package of sustainable transport investments through the City Region Sustainable Transport Settlement (CRSTS) between 2022-2027.</p>

## YOU SAID:

### Standards

- Advise against introducing targets for energy efficiency that attempt to push the industry faster than the statutory programme.
- Same ambitions are being driven forward by separate legislation (Building Regs) and important that policy approach ensures consistency with and avoid duplication.
- Building regulations and planning requirements are not aligned which raises the prospect that the development industry must respond to both and could lead to less likely to achieve optimal outcomes.
- Presents a challenge for the industry, especially as face a significant shortage in the number of people in the workforce qualified.
- Risks endangering five year housing supply and detracting from other critical policy goals.
- Costs and viability also need to be carefully considered.
- Important to engage with United Utilities and the Environment Agency to ensure longer term investment programmes complement the SDS plan period.
- Code for Sustainable Homes been shown to be impractical to enforce through the planning process.
- Apply principles ensuring the occupiers of new developments enjoy an appropriate standard of amenity and are not adversely affected by neighbouring uses e.g. WwTW.
- Require rooftop solar panels on large industrial and commercial buildings of more than 1000sqm.
- Should be a specific criteria-based policy for renewable energy developments.

## WE DID:

The SDS has included a range of measures to increase energy efficiency in buildings without setting specific thresholds at this stage.

Please refer to our proposed development principle relating to **LCR DP1 Planning for Climate Change and LCR DP11 Energy.**

As set out in the SDS Viability Information Note (2023), in preparing the SDS Viability Assessment (that will be prepared to support the Draft SDS) it will be necessary to establish for new development the extent to which SDS and Local Plan policies seek to achieve standards in excess of those now within Building Regulations and the proposed Future Homes Standards.



YOU SAID:	WE DID:
<p><b>Non-planning related comments</b></p> <ul style="list-style-type: none"> <li>• The use of grants, economic incentives and investment for businesses applying circular and resource efficient practices would be welcomed.</li> <li>• Further investment into transport system to reduce demand for private car.</li> </ul>	<p>We would like to take this opportunity to thank you for comments. However, these are matters which cannot be directly influenced by the SDS.</p>
<p><b>Wastewater</b></p> <ul style="list-style-type: none"> <li>• Should mention wastewater management which will become more difficult as the climate changes</li> <li>• Waste management solutions must be genuinely environmentally friendly.</li> </ul>	<p>The provision of wastewater treatment infrastructure assets has been addressed in <b>LCR SP4 Strategic Infrastructure, LCR DP9 Infrastructure Provision</b> and <b>LCR DP13 Water Management and Flood Risk</b>.</p>
<p><b>Retrofitting</b></p> <ul style="list-style-type: none"> <li>• Re-fitting existing buildings, not just homes but also public, community, commercial and industrial buildings, to reduce carbon outputs.</li> <li>• Refit existing buildings including private, public, commercial, and industrial.</li> <li>• Explicit mention of prioritising retrofitting of old buildings over new build.</li> </ul>	<p>Retrofitting existing buildings can only be directly influenced by the planning system if applications are submitted for retrofit projects of individual homes or large scale energy proposals (below 50kw) e.g. district heat networks. Therefore, the scope for the SDS is limited however support is given to the retrofitting of existing buildings in <b>LCR SS1 Liverpool City Region Spatial Strategy</b> and <b>LCR DP11 Energy</b> to improve their energy efficiency where planning permission is needed.</p>

YOU SAID:	WE DID:
<p><b>Renewable energy</b></p> <ul style="list-style-type: none"> <li>• Make electricity cheap and give it/sell it to the inhabitants and attract new factories with the low price of energy.</li> <li>• Look to influence resource efficiency in manufacturing and production business.</li> <li>• Have greater focus on proactively supporting renewable energy, including areas suitable for solar/wind farms.</li> </ul>	<p>Improving resource efficiency, and support for renewable energy have been addressed in <b>LCR DP11 Energy</b> and <b>LCR DP12 Resources</b>.</p>
<p><b>Resource efficiency</b></p> <ul style="list-style-type: none"> <li>• Need to consider the materials used in the construction and the design of buildings early in the development process.</li> <li>• See how the circular economy features in the London Plan (built environment planning).</li> <li>• Enforce new builds to be carbon neutral.</li> <li>• Land use, spatial design and development must make it easier for businesses and residents to prevent waste and reuse, share, repair or recycle resources.</li> <li>• This will require innovation and an understanding of how people interact with materials and the economic benefits of rethinking resources.</li> <li>• Need to stop using materials which are not recycled or sustainable rather than just use more e.g. topsoil is expensive and local substrates can be sourced from builders' sands and Mersey Grit</li> <li>• Separate policy considering how to address energy and resources (including water) efficiency of new homes.</li> </ul>	<p>Consideration for materials, circular economy, carbon neutrality, and resource reuse have been addressed in <b>LCR DP11 Energy</b> and <b>LCR DP12 Resources</b>.</p>

## YOU SAID:

### Water

- New development should use surface water as a resource to promote water efficiency, capturing surface water close to where it falls above ground.
- Should mention wastewater management which will become more difficult as the climate changes.
- The policy approach should protect water resources from pollution by microplastics which is closely aligned with the overall need to reduce plastic consumption.
- Policy approach is consistent with advice from United Utilities and the Environment Agency and is a sustainable approach to waste management and resource consumption to waste including water supply.
- Encouraged to see the policy approach clearly references requirements to ensure protection of public water supply.
- Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements such as rainwater recycling, green roofs, water butts and permeable surfaces.
- Policy can ensure a holistic approach to managing the impacts of Climate Change and change the approach to drainage by applicants.

## WE DID:

Suggestions made for new development to use surface water for water efficiency, addressing wastewater management challenges, protect water resources from microplastic pollution, promote sustainable waste management and, using modern design techniques to reduce infrastructure impact have been addressed in **LCR DP1 Planning for Climate Change** and **LCR DP13 Water Management and Flood Risk**.

YOU SAID:	WE DID:
<p><b>Marine</b></p> <ul style="list-style-type: none"> <li>• Reference Marine Plan policies on renewables, including offshore wind energy, and carbon capture and storage.</li> <li>• Further emphasise the value of marine-won aggregates and importance of safeguarding wharves and other essential mineral infrastructure to meet supply.</li> </ul>	<p>Policy approach to renewables and carbon storage, and reference to the North West Marine Plan have been addressed in <b>LCR SP8 River Mersey and the Coast</b> and <b>LCR DP1 Planning for Climate Change</b>.</p> <p>The importance of safeguarding wharves and associated mineral infrastructure for marine won/dredged aggregates has been addressed in <b>LCR DP12 Resources</b>.</p>
<p><b>Policy Approach</b></p> <ul style="list-style-type: none"> <li>• Policy approach is generally well-supported and well-thought out but could be strengthened in areas.</li> <li>• New industry needs to be attracted to the area.</li> <li>• Important that the policy approach does not impose policy obligations which will be rendered obsolete.</li> <li>• Should not conflict with the broader objective which must be to reduce net carbon demand.</li> <li>• Geographical areas identified for renewable and low carbon energy provision and associated infrastructure should be identified through the Local Plan or another appropriate mechanism.</li> <li>• Should clarify financial support beyond scope of planning process.</li> <li>• Planning decisions need to apply scrutiny and not accept claims at face value.</li> <li>• Further information and clarity as to how the policy will be delivered.</li> </ul>	<p>Following on from the previous engagement, amendments to our approach and new policy areas have emerged from the feedback received. Please see these changes in our latest SDS engagement.</p> <p>In addition, the SDS sets the city region’s development framework, which is closely aligned with delivering the aims and objectives of the LCR Combined Authority’s Innovation Prospectus and Plan for Prosperity, therefore attracting new industries to the city region. Support for Investment Zones is one example.</p>

### YOU SAID:

#### Policy Approach

- Good policy coverage that is targeted at tackling air quality and reducing pollution.
- Concerns about how this might be implemented in the ‘real world’.
- Policy does not go far enough, was too weak and was lacking ambition.
- Recognition of the importance of clean air and the impact of poor air quality on health across the city region.
- Do not want to see pollution diverted elsewhere and air quality levels monitored and published.
- Suggested policy approach aligns with the marine air quality plan but should be mentioned explicitly.
- Comments appreciated the link between climate change and decarbonisation with air quality.
- Carbon sinks should be referred to and protected under this policy.
- Greater emphasis on practical measure rather than the tick box approach of requiring an Air Quality Management Assessment, which without practical measures is worthless.
- Port of Liverpool Access and its impact on air quality in South Sefton elicited strong feelings.
- Policy should prioritise existing communities, for example those in the areas of deprivation and highest levels of air pollution.

### WE DID:

Policy coverage targeting air quality and pollution have been addressed in **LCR DP1 Planning for Climate Change, LCR DP5 Impacts on Health, LCR DP7 The Natural Environment and Nature Recovery** and **LCR DP10 Sustainable Transport and Travel**.

The Combined Authority has an adopted [Air Quality Action Plan](#) that sets out our commitments to clean air.

YOU SAID:	WE DID:
<p><b>Clarification</b></p> <ul style="list-style-type: none"> <li>• Clarification required about which emissions form part of the policy.</li> <li>• Must clarify which locations, size and types of development would require an Air Quality Assessment.</li> </ul>	<p>Further clarification on air quality has been addressed in <b>LCR DP5 Impacts on Health</b>. Further guidance where the requirement of an AQMA applies is set out within the policy explanation.</p>
<p><b>Modal Shift</b></p> <ul style="list-style-type: none"> <li>• Modal shift has been highlighted as being a key driver to reducing pollution and improving air quality.</li> <li>• Policy approach does not consider impact of HGV traffic.</li> <li>• Cleaner modes of transport should be proposed and fostered.</li> <li>• Strategic level support and encouragement for sustainable and clean transport solutions to support new development.</li> <li>• Effective measures to improve air quality, for example support Electric Vehicle Infrastructure and high-quality Travel Plans.</li> <li>• Restricting car parking and making active travel more attractive and accessible will encourage modal shift.</li> </ul>	<p>Encouraging modal shift from road to more sustainable alternatives as well as the consideration for HGVs have been addressed in <b>LCR DP10 Sustainable Transport and Travel</b>.</p> <p>Further support for sustainable transport solutions, electric vehicle infrastructure and promoting active travel have been addressed in <b>LCR SP4 Strategic Infrastructure</b> and <b>LCR DP1 Planning for Climate Change</b>.</p> <p>The Combined Authority is currently in the process of preparing the Local Transport Plan 4 that will set out a transport hierarchy approach to achieve significant modal shift which, will be fully supported by the SDS. The development of the Local Transport Plan 4 and how the development of the SDS is closely aligned with the challenges and emerging priorities can be viewed <a href="#">here</a>.</p>

## YOU SAID:

### Natural Environment

- Supportive of policy approach that seeks to improve air quality because of its impacts on physical and mental health, environmental improvement, and a general wider natural environment.
- Concern about siting of warehouses and industrial units that could cause harm to the natural environment, and that mitigation measures will not be strong enough.

## WE DID:

Improving air quality, environmental impact, and concerns regarding warehouse siting have been addressed **in LCR DP1 Planning for Climate Change, LCR DP5 Impacts on Health and LCR DP7 The Natural Environment and Nature Recovery.**

The SDS is based on evidence from technical studies and assessments, aiming to achieve sustainable development by balancing economic, social, and environmental considerations through an Integrated Impact Assessment.

A Habitats Regulations Assessment has also been conducted to assess potential impacts on nature conservation sites and propose mitigation measures where necessary.

YOU SAID:	WE DID:
<p><b>Transport</b></p> <ul style="list-style-type: none"> <li>Public transport should be clean, efficient, easy and clean where possible.</li> <li>Air quality issues that arise as a result of shipping, including freight and cruiseliners, from cars and HGVs, especially around the dock areas should be considered.</li> </ul>	<p>Supporting the delivery of clean, efficient, and environmentally friendly public transport has been addressed in <b>LCR DP10 Sustainable Transport and Travel</b>.</p> <p>Sefton Council are looking at air quality issues in the vicinity of the port through a possible Clean Air Zone. Further information can be found <a href="#">here</a>.</p>
<p><b>Mitigation</b></p> <ul style="list-style-type: none"> <li>Good approach to mitigating against poor air quality.</li> <li>Measures suggested included better opportunities for active travel, improved public transport connectivity to reduce the need for car travel and support for EV charging infrastructure.</li> <li>Demonstrate awareness between other policy areas, such as the role of green infrastructure and nature-based solutions.</li> <li>Concerns that not enough is being done to mitigate negative impacts and a lack of accountability.</li> <li>Comprehensive air quality monitoring system that can be viewed by local communities.</li> </ul>	<p>Promoting active travel, improved public transport, EV charging, green infrastructure, and comprehensive air quality monitoring have been taken into consideration as mitigation measures in <b>LCR DP1 Planning for Climate Change, LCR DP5 Impacts on Health and LCR DP10 Sustainable Transport and Travel</b>.</p> <p>Whilst the Combined Authority has published ambitions to radically improve air quality monitoring and modelling, this remains a Local Authority function. Further information on interventions to monitor air quality in real time and achieve the target of becoming net zero by 2040, can be found <a href="#">here</a>.</p>



## YOU SAID:

### Application

- Concerns that the application may be problematic as the entire Liverpool administrative area has been designated with a blanket AQMA, though particulate mapping would tend to suggest that more substantive issues occur in the vicinity of key movement corridors and urban centres.
- Concern that AQMAs may be repeating national policy.
- Concern that policy would be a 'tick-box exercise' that needs to be followed with applicable practical measures.
- Consider the impact of air pollution on designated sites.
- Simplified and cohesive strategy would help development industry align.
- Concern that technical detailed analysis may ruin the correct application of the policy approach.
- Must ensure that any resultant policy framework does not place an unreasonable burden to development (in the context of justification material) and/or duplicate what is being otherwise achieved.
- Ways in which people can monitor and feed in air quality.
- Agent of change should also be considered if the issues are not being caused by the development itself.
- New residential or educational development should not be built adjacent to areas of poor air quality, including along motorways.

## WE DID:

Policy measures in relation to Air Quality Management Areas and its application have been addressed in **LCR DP1 Planning for Climate Change, LCR DP5 Impacts on Health, LCR DP7 The Natural Environment and Nature Recovery and LCR DP10 Sustainable Transport and Travel.**

As part of the Habitats Regulations Assessment process, consideration has been given to the impact of air pollution on designated sites.

Further consideration has also been given from the feedback received on the implementation of policies which has been set out within the explanatory text.

The application of the Agent of Change principle has been addressed in **LCR SP9 Culture, Tourism and Visitor Attractions and LCR DP5 Impacts on Health.**

YOU SAID:	WE DID:
<p><b>Assessments</b></p> <ul style="list-style-type: none"> <li>• Supportive of requiring an Air Quality Impact Assessment that relates to the location, type, and size of development.</li> <li>• Be careful not to duplicate with local authority validation requirements.</li> <li>• Further clarification is needed about which locations, sizes and types of development will be required to undertake an assessment.</li> </ul>	<p>The proposed requirement for Air Quality Impact Assessments has now been removed. This will be addressed by Local Planning Authorities, where appropriate.</p> <p>The Combined Authority has however, adopted an Air Quality Action Plan that sets out our commitments to clean air.</p>
<p><b>Thresholds</b></p> <ul style="list-style-type: none"> <li>• Policy approach should specify the types and sizes of development an assessment would be required and what mitigation measures are appropriate.</li> <li>• Consider that non-major development should be excluded.</li> <li>• Do not support the approach in its entirety for the reasons that a blanket AQMA would not be effective.</li> <li>• Local Planning Authorities would wish to set their own thresholds and determine where air quality impact assessments are required based on local circumstances.</li> <li>• Thresholds should be supported by sufficient technical evidence regardless.</li> </ul>	<p>As per the above, the requirement for Air Quality Impact Assessments has now been removed.</p>

YOU SAID:	WE DID:
<p><b>Greenspace</b></p> <ul style="list-style-type: none"> <li>Existing Green Belt land and green spaces must be protected from all forms of development, no matter whether ‘overriding social and economic benefits’ are claimed.</li> <li>Concern that cutting down trees is done too readily.</li> <li>Tree planting should be expanded, and green spaces viewed as the lungs of the city region.</li> </ul>	<p>The protection of green belt and green spaces including tree planting have been addressed in <b>LCR SP6 Green and Blue Infrastructure, LCR SP10 Rural City Region, LCR DP3 Economic Prosperity and LCR DP7 The Natural Environment and Nature Recovery.</b></p>
<p><b>Green economy</b></p> <ul style="list-style-type: none"> <li>Pushing green energy solutions for transport and manufacturing.</li> </ul>	<p>The promotion of green energy solutions has been addressed in <b>LCR DP1 Planning for Climate Change and LCR DP11 Energy.</b></p>

## YOU SAID:

### Methods

- Adopt an LCR congestion / emissions charging zone.
- Air pollution kills and makes peoples' lives a misery; if air pollution levels would exceed acceptable levels, then planning must be refused - this would then encourage cleaner, greener developments.
- Expanding tree planting and green spaces to be our lungs.
- Ways in which people can monitor and feed in air quality.
- More specifics on mitigation and transparency e.g. holding businesses accountable, where it is known to be bad already.
- It should cover "new roads" and plans to identify alternatives to new roads, more traffic, and the resultant pollution any new roads will cause.

## WE DID:

Measures to reduce air pollution, encourage cleaner, greener developments, and promote tree planting have been addressed in **LCR SP6 Green and Blue Infrastructure, LCR DP1 Planning for Climate Change, LCR DP5 Impacts on Health** and **LCR DP10 Sustainable Transport and Travel**.

However, the adoption of LCR emission charging zones cannot be enforced by the SDS. The emerging Local Transport Plan 4 addresses emission charging zones by stating the Combined Authority does not consider that a localised road user charging scheme or a workplace parking levy scheme is the best way of supporting the vision and goals in this Local Transport Plan 4.

At a local level, it is worth noting Liverpool City Council explored a Clean Air Zone and Sefton Council also explored similar measures around the vicinity of the port. There is also evidence emerging of a move to a national road pricing system, which will continue to be monitored. The Combined Authority also owns and controls two tolled road crossings.

The SDS will be accompanied by a monitoring framework which sets out monitoring indicators that will report on the progress made following the preparation and implementation of the SDS. Upon adoption of the SDS, Authority Monitoring Reports will be published to show the progress made and can help inform if an update is required of the SDS.

YOU SAID:	WE DID:
<p><b>Design</b></p> <ul style="list-style-type: none"> <li>• Monitor and address air pollution through design and construction.</li> <li>• Ongoing impact after construction should be monitored and minimised for the lifetime of the development.</li> <li>• Design should be high quality and environmentally friendly.</li> </ul>	<p>Environmentally sustainable design considerations have been addressed in <b>LCR DP1 Planning for Climate Change</b> and <b>LCR DP6 High Quality Design</b>.</p>
<p><b>Further policy coverage</b></p> <ul style="list-style-type: none"> <li>• A policy to require all development to incorporate electric vehicle points.</li> <li>• Should also consider adjoining uses where communities may breathe in particulate matter, such as playing fields.</li> <li>• Undertake a strategic review to address the number of HGVs on the roads.</li> </ul>	<p>Electric vehicle charging points and infrastructure has been addressed in <b>LCR SP4 Strategic Infrastructure</b> and <b>LCR DP10 Sustainable Transport and Travel</b> whilst having regard to appropriate Building Regulations to avoid repeating what is already needed as a minimum standard in new development. The consideration of adjoining communities has been addressed in <b>LCR DP2 Sustainable and Inclusive Communities</b>.</p> <p>The emerging Local Transport Plan 4 will seek to achieve significant modal shift in order to support the priorities of improving health and reducing carbon through the decarbonisation of transport by 2040.</p> <p>The Combined Authority is also leading work to understand freight movements to and from the Port of Liverpool and to be able to target actions to move freight by alternative, net zero forms of transport.</p>

## YOU SAID:

### Active Travel

- Active travel is an important element of tackling poor air quality.
- Strategic routes for active travel must link to enable local and end-to-end journeys which will encourage modal shift, as per the LCWIP, and would connect to networks beyond LCR.
- Support is given for more active travel infrastructure, especially with segregated cycling network that should be grown and protected, and better connected.
- Applications for transport infrastructure and requirement should relate to walking, cycling and public infrastructure as part of a masterplanning exercise.
- Safety is a big concern for active travel and hinders modal shift away from private car.
- Calls for any initiatives to be coupled with investment in behaviour change.

## WE DID:

Please see our current engagement, where active travel is a recurring theme throughout the SDS.

Particular emphasis on promoting active travel through the Transport Hierarchy can be seen in our proposed development principle relating to **DP10 Sustainable Transport and Travel**.

## Active Travel

YOU SAID:	WE DID:
<p><b>Infrastructure and accessibility</b></p> <ul style="list-style-type: none"> <li>• Cycling infrastructure needs to be more accessible and more cycle storage in residential areas to encourage uptake.</li> </ul>	<p>Cycling infrastructure and accessibility has been addressed in <b>LCR DP10 Sustainable Transport and Travel</b>.</p>
<p><b>Safety</b></p> <ul style="list-style-type: none"> <li>• Safety is an issue in terms of accessibility which keeps people in their cars.</li> <li>• Overall walking and cycling connectivity across the city region are generally good.</li> <li>• Issues around safety on public transport.</li> <li>• Should be clearer on making active transport safe and attractive.</li> <li>• Remove 'if possible'.</li> </ul>	<p>Issues around safety in relation to public transport and active travel have been addressed in <b>LCR DP10 Sustainable Transport and Travel</b> and <b>LCR DP15 Safer Placemaking</b>.</p>
<p><b>Green infrastructure and environment</b></p> <ul style="list-style-type: none"> <li>• Supportive about the role that integrated and accessible green infrastructure can play in offering opportunities for active travel, both within and beyond the city region.</li> <li>• GI, either formal or low-quality greenspace, should be protected and developed to improve access for those with disabilities, families, and the elderly.</li> </ul>	<p>Supporting integrated green infrastructure for active travel and improving accessibility has been addressed in <b>LCR SP6 Green and Blue Infrastructure</b>.</p>

YOU SAID:	WE DID:
<p><b>Design</b></p> <ul style="list-style-type: none"> <li>• Design is key to supporting health improvements and reducing pollution by improving connectivity. Welcome the link to Sport England’s Active Design guidance.</li> <li>• Generally supportive of identifying key components of active travel network and how and where it can be utilised to create healthier environments.</li> </ul>	<p>Supporting healthier environments through connectivity and active travel measures have been addressed in <b>LCR DP6 High Quality Design, LCR DP10 Sustainable Transport and Travel</b> and <b>LCR DP16 Delivering Social Value.</b></p>
<p><b>Modal shift and transport</b></p> <ul style="list-style-type: none"> <li>• The importance of prioritising active travel, in terms of physical activity levels, health and wellbeing outcomes, environmental benefits and safety and its inclusion welcomed.</li> <li>• Better public transport should be closely aligned with this policy approach, as well as a general shift away from private car use which will ultimately have a positive impact on air quality.</li> <li>• There is an equality and equity issue in public transport and ownership of bikes in more deprived areas.</li> <li>• The importance of hearing young people’s opinion who have less interest in car ownership.</li> <li>• Concerns about how cycle lanes interact with car movement and how this in turn might lead to a reduction in road space for public transport.</li> </ul>	<p>The prioritisation of active travel and recognising its importance for physical activity, health, wellbeing, and environmental benefits; improving public transport, addressing equity, involving young people, and considering cycle lanes are matters which have been considered and addressed in <b>LCR SP4 Strategic Infrastructure, LCR DP1 Planning for Climate Change</b> and <b>LCR DP10 Sustainable Transport and Travel.</b></p>



## YOU SAID:

### New development

- New development should be located in areas that benefit from public transport and where currently walking and cycling to local services and facilities can be used.
- SDS should identify existing and proposed walking and cycling networks.
- Spatial pattern of development should contribute towards more active travel and strategic housing locations will need to be considered to encourage this.
- New development has a role to play in encourage active travel and address health inequalities.
- Should highlight the importance of well-connected public transport to walking and cycling and new development.
- Policy shouldn't be prescriptive but supportive overall.
- Should enable developers to maximise opportunities to contribute towards modal shift and thus prioritise active travel and public transport.

## WE DID:

The location of development and sustainable transport infrastructure serving these areas have been addressed in **LCR SP4 Strategic Infrastructure, LCR DP10 Sustainable Transport and Travel** and **LCR DP5 Impacts on Health**.

In addition, please see **LCR SS1 Liverpool City Region Spatial Strategy** which addresses the spatial distribution.

Active travel projects associated with new developments have been identified and therefore informed the SDS within the LCR SDS Initial [Engagement Strategic Infrastructure Plan \(2023\)](#), [LCR Local Cycling and Walking Plan](#) and the [City Region Sustainable Transport Settlements](#) programme.

The Combined Authority recognises existing planning policies and SPDs of the six constituent local authorities regarding matters such as cycle parking. At the city regional level, this will further encourage the assessment and sharing of best practises within the city region, demonstrating how active travel can be successfully implemented.

YOU SAID:	WE DID:
<p><b>Engagement</b></p> <ul style="list-style-type: none"> <li>• More engagement with highways authorities to smooth out potential obstacles early on in the planning process and mitigate against any potential challenges.</li> </ul>	<p>As part of the strategic planning process, LCRCA will engage proactively with all relevant statutory consultees.</p>
<p><b>Further policy coverage</b></p> <ul style="list-style-type: none"> <li>• Inclusion of 20-minute neighbourhoods to support policy approach.</li> <li>• Policy would be strengthened if it would be incorporated into new developments to create multifunctional spaces.</li> <li>• Helpful to identify the links to recreational disturbance mitigation works so that people understand the importance of the environment which they are travelling to.</li> <li>• Suggestion to rename the policy topic ‘Active Environments’ and to strengthen the policy given the requirement to address poor health.</li> <li>• Important to consider that prioritisation of active travel does not impede otherwise sustainable and acceptable development proposals.</li> <li>• Must be underpinned by a strong evidence base.</li> <li>• The policy should set out what would be expected from developers.</li> </ul>	<p>Because of its cross-thematic nature, active travel has become a central theme that runs throughout numerous policies as the SDS has evolved. Please see our current engagement, which includes references to active travel and environments in a number of policies.</p>

## › Health Impact Assessments

### YOU SAID:

#### Application

- Overall support for requiring HIAs.
- Some concerns raised about a blanket approach or setting thresholds.
- Should consider aligning with other Local Plan approaches.
- May not be considered effective at achieving positive health outcomes.
- Concerns as to how this might work in practice, in particular how it relates to tangible land-use outcomes.
- Policy should provide a clear and concise framework for applications to respond to and there is a strategy through which it is clear that improvements can be secured.
- Should include new health issues generated by pollution, loss of space and impacts on mental health.
- Development should demonstrate how they will make a positive impact on local resident's health.

### WE DID:

Concerns regarding the application of Health Impact Assessments should now be addressed through changes made to the policy approach in **LCR DP4 Promoting Health and Wellbeing**.

In addition, **LCR DP5 Impacts on Health** addresses points made in relation to planning positively to mitigate adverse impacts on human health.

YOU SAID:	WE DID:
<p><b>Thresholds</b></p> <ul style="list-style-type: none"> <li>• Setting out thresholds would be more effective rather than a blanket requirement which indicates that health would likely only be considered on sites of a certain scales.</li> <li>• Sites of all scales are capable of making important contributions to improving health outcomes however this would not be a useful resource of time and expenditure.</li> <li>• Without setting out thresholds it appears unclear how the proposed policy approach would work in practice.</li> <li>• Considered in HIAs should accompany planning applications that also require EIA.</li> <li>• Thresholds should be determined on a borough-by-borough basis to understand the detail of the potential impact.</li> </ul>	<p>The threshold requirement for Health Impact Assessments has been addressed in <b>LCR DP4 Promoting Health and Wellbeing</b>.</p>
<p><b>Assessments</b></p> <ul style="list-style-type: none"> <li>• Recognition that HIAs are becoming more common planning requirements, particularly for large-scale developments.</li> <li>• Disagree with policy approach because population health is now a requirement of EIAs as of 2017.</li> <li>• It would be more beneficial to ensure health is included in EIA rather than separate policy.</li> <li>• Risk of repeating NPPF and duplication of existing EIA regulations and requirements.</li> <li>• Planning process should have reduced bureaucracy rather than introducing further requirements.</li> </ul>	<p>The use of Health Impact Assessments has been addressed in <b>LCR DP4 Promoting Health and Wellbeing</b>.</p> <p>Whilst population and human health are on the list of environmental topics that are considered when scoping an EIA, it should only be scoped into an EIA where the likely health consequences of the projects are considered to be significant.</p>
<p><b>Design</b></p> <ul style="list-style-type: none"> <li>• Design has a key role to play in achieving positive health and wellbeing outcomes and this should be considered in HIAs.</li> </ul>	<p>Positive health and wellbeing outcomes as a result of design have been addressed in <b>LCR DP6 High Quality Design</b>.</p>

YOU SAID:	WE DID:
<p><b>Delivery of new homes</b></p> <ul style="list-style-type: none"> <li>• Concern that the requirement to submit a HIA could impact delivery of new homes.</li> <li>• Good mental health can be addressed by having good quality and affordable homes and therefore advise caution against the policy.</li> <li>• Recognition of the value that new housing developments could have on better health and wellbeing outcomes by optimising active travel measures and accessibility to public open space.</li> </ul>	<p>Promoting quality, affordability, and enhancing mental health through active travel and public open space have been addressed in <b>LCR DP2 Sustainable and Inclusive Communities, LCR DP4 Promoting Health and Wellbeing</b> and <b>LCR DP16 Social Value</b>.</p> <p>In addition, please see <b>SS1 Liverpool City Region Spatial Strategy</b> which addresses the spatial distribution.</p>
<p><b>Clarification</b></p> <ul style="list-style-type: none"> <li>• Lack of clarification surrounding the policy approach in terms of what is meant by ‘specified development’.</li> <li>• Any requirement for HIAs must be proportionate.</li> <li>• Further detail and consideration for how mental health will be improved across the City Region</li> </ul>	<p>Further clarification on the requirement of Health Impact Assessments has been addressed in <b>LCR DP4 Promoting Health and Wellbeing</b>.</p>
<p><b>Further policy coverage</b></p> <ul style="list-style-type: none"> <li>• Inclusion of Social Value requirements in developments that look to support, protect and improvement mental health for residents.</li> <li>• HIAs should be requested for all new developments of hot food takeaways, tobacco, manufacturing, and chemical industries, and those that generate car journeys, as well as major development.</li> <li>• Any applications that may impact on our green spaces and wilderness such as large developments, housing, and roads.</li> </ul>	<p>Including Social Value requirements in mental health-supporting developments, HIA requirements and addressing green spaces and wilderness impacts in large developments, housing, and roads have been addressed in <b>LCR DP9 Infrastructure Provision, LCR DP4 Promoting Health and Wellbeing</b> and <b>LCR DP16 Social Value</b>.</p>

## Healthy Food Businesses

YOU SAID:	WE DID:
<p><b>Exclusion zones</b></p> <ul style="list-style-type: none"> <li>• Generally supportive but policy area is a detailed development management type policy.</li> <li>• Does not fully reflect the requirement to address food deserts and access healthy food convenient stores in all communities and instead looks to restrict hot food takeaways.</li> <li>• Should actively promote healthy food businesses</li> </ul>	<p>Access to healthy food and limiting hot food takeaways have been addressed in <b>LCR DP4 Promoting Health and Wellbeing.</b></p>
<p><b>Application</b></p> <ul style="list-style-type: none"> <li>• Policy approach should be very broad in nature and set out over-arching principles, with detailed approach to policy being set locally if appropriate.</li> <li>• Crucial that the application of such a policy is precise but also allows the applicant to provide proper context rather than imposing a policy which is inflexible and unreasonably determinative.</li> <li>• Would be more appropriately set through Local Plans and therefore more reflective of local circumstances.</li> <li>• Balance between restricting hot food takeaways and economic development and job creation should be considered.</li> </ul>	<p>Assessing applications for hot food takeaways using local evidence, their proximity to schools and other facilities and their economic role have been considered and addressed in <b>LCR DP4 Promoting Health and Wellbeing.</b></p>

YOU SAID:	WE DID:
<p><b>Policy approach</b></p> <ul style="list-style-type: none"> <li>• Generally supportive of the suggested policy approach but a wider recognition that limiting hot food take-aways near schools and other places where young people congregate is just one measure to tackle obesity.</li> <li>• Number of fast food outlets is too high and are too close to each other.</li> <li>• Applications should be encouraged to offer healthier options for takeaway food.</li> <li>• Policy approach likely to be challenged by major operators.</li> <li>• Such a policy can become nebulous and impede the ability to undertake an activity which is eminently legal and not subject to licensing.</li> <li>• Issues for greater capacity of decision-making for elder children and is not clear-cut how this policy would work in context of higher education establishments.</li> <li>• Crucial that the application of such a policy is precise but also allows the applicant to provide proper context rather than imposing a policy which is inflexible and unreasonably determinative.</li> <li>• Emphasise the link between deprivation, hot food takeaways and obesity, also need access to affordable indoor leisure such as leisure centres, gyms, swimming pools, football pitches etc.</li> </ul>	<p><b>LCR DP4 Promoting Health and Wellbeing</b> addresses the issue of the proliferation of hot food takeaways.</p>
<p><b>Further policy coverage</b></p> <ul style="list-style-type: none"> <li>• Wider remit such as drive-throughs necessary – travel to/availability and litter an issue</li> <li>• Impact on health and the environment, such as plastic trays, bottles, and wrappings,</li> </ul>	<p>We would like to take this opportunity to thank you for comments. However, these are matters which cannot be directly influenced by the SDS.</p>

## › Social Infrastructure

YOU SAID:	WE DID:
<p><b>Viability</b></p> <ul style="list-style-type: none"> <li>• Cost of policy must be assessed through viability assessment.</li> <li>• Important to consider the substantial contributions housebuilders make towards the provision of public services and goods.</li> <li>• Tax revenue also benefits the city region indirectly.</li> </ul>	<p>As set out in the SDS Viability Information Note (2023), in preparing the SDS Viability Assessment (that will be prepared to support the Draft SDS) it will be necessary to establish any viability implications of developer contributions having regard to the approach and likely requirement within the respective Local Authority areas.</p>
<p><b>Protection and provision</b></p> <ul style="list-style-type: none"> <li>• Deficits in provision or conditions of existing infrastructure should be identified on a borough-by-borough basis to improve on existing policy.</li> <li>• New social infrastructure will then be provided depending on local level need.</li> <li>• Policy needs to be more positive, in that any deficits in provision or condition will be identified and new strategic social infrastructure provided.</li> <li>• Welcome the reference to support being given to the growth of strategic social infrastructure in highly accessible locations.</li> <li>• Any identification of existing strategic social infrastructure to be protected and opportunities to grow should be undertaken with LPAs.</li> </ul>	<p>The forecast strategic infrastructure needs for the SDS are identified in the LCR SDS Initial Engagement Infrastructure Plan (2023). The strategic infrastructure has been defined by all infrastructure that will impact or support the strategic objectives of the SDS, in two or more local authorities within the LCRCA.</p> <p>Key strategic infrastructure requirements including social infrastructure provision are set out in <b>LCR SP4 Strategic Infrastructure</b> and <b>LCR DP9 Infrastructure Provision</b>.</p>



YOU SAID:	WE DID:
<p><b>Location</b></p> <ul style="list-style-type: none"> <li>• Be aware that locating social infrastructure in accessible locations only run the risk of increasing inequalities in areas that are already inaccessible and poorly connected.</li> <li>• Accessibility must be increased to ensure social infrastructure is in the right location to meet an identified need that is supported by evidence.</li> <li>• All infrastructure should be accessible and available.</li> <li>• Social infrastructure provides crucial spaces vital to health and wellbeing outcomes.</li> </ul>	<p>Ensuring social infrastructure is accessible to reduce inequalities in inaccessible area has been addressed in <b>LCR DP9 Infrastructure Provision, LCR DP4 Promoting Health and Wellbeing</b> and <b>LCR DP10 Sustainable Transport and Travel.</b></p>
<p><b>Loss</b></p> <ul style="list-style-type: none"> <li>• Public buildings such as schools and hospital are being demolished and re-built which is costly and environmentally harmful.</li> <li>• Overdevelopment risks the loss of social infrastructure, and as a result, community cohesion, for example, Rimrose Valley.</li> </ul>	<p>The loss of social infrastructure has been addressed in <b>LCR DP4 Promoting Health and Wellbeing</b> and <b>LCR DP9 Infrastructure Provision.</b></p>
<p><b>Clarification</b></p> <ul style="list-style-type: none"> <li>• Clear definition of strategic social infrastructure, social organisations, social enterprises, and social economy is required, potentially as part of the reasoned justification for the policy.</li> <li>• Define what ‘highly accessible’ means.</li> <li>• Avoid reference to a ‘short walking distance’ that may be impractical but also fails to reflect the reality that people will travel further to access important services.</li> <li>• Further clarity required in terms of how the evidence-base will look and its considerations.</li> <li>• Simple mapping exercise will not present appropriate supply and demand analysis</li> <li>• Proposed policy approach should be set within the context of support for wider business and employment uses.</li> </ul>	<p>Further clarification including how we define social infrastructure has been addressed in <b>LCR DP4 Promoting Health and Wellbeing</b> and <b>LCR DP9 Infrastructure Provision.</b></p>

YOU SAID:	WE DID:
<p><b>Policy approach</b></p> <ul style="list-style-type: none"> <li>• Welcome integrated approach to active travel and public transport.</li> <li>• Should provide high-level policy that protects and enhances social infrastructure in line with Local Plan policies and their evidence-bases.</li> <li>• Concerns about the use of ‘support’ as it goes beyond scope of the local planning authority (LPA) and the planning process as it cannot secure the continued use of the building or land.</li> <li>• It can protect a building or land from development though refusal of planning development for an alternative use or development for example.</li> <li>• Monitoring indicators do not consider indoor and outdoor sport monitoring requirements.</li> <li>• These are based on quantity, quality, accessibility, and availability.</li> <li>• Sport England can assist with existing LA Sports Needs Assessments</li> </ul>	<p>Integrating active travel and public transport, providing a high-level policy, protection of social infrastructure, considering ‘support’ beyond LPA scope, and consider indoor and outdoor sport monitoring requirements have been addressed in <b>LCR DP4 Promoting Health and Wellbeing</b> and <b>LCR DP9 Infrastructure Provision</b>.</p> <p>The SDS will be accompanied by a monitoring framework which sets out monitoring indicators that will report on the progress made following the preparation and implementation of the SDS. Upon adoption of the SDS, Authority Monitoring Reports will be published to show the progress made and can help inform if an update is required of the SDS.</p>
<p><b>Further Policy Coverage</b></p> <ul style="list-style-type: none"> <li>• Have regard to changes in Government policy in this area to ensure that SDS policy relating to developer obligations is consistent with it.</li> <li>• Investment in retrofitting such buildings.</li> <li>• Policy approaches should address root causes of poor health, rather than addressing health problems.</li> <li>• Support for the voluntary and social sector and recognise its work and encourage partnership with statutory bodies.</li> <li>• Make all infrastructure accessible and available.</li> <li>• Policy approach should identify assets across the City Region.</li> </ul>	<p>The SDS closely monitors changes in national policy and will continue to do so throughout its development.</p> <p>Retrofitting existing buildings is a matter which cannot be directly influenced by the SDS. However, support is given to the retrofitting of existing buildings to improve their energy efficiency where planning permission is needed.</p>

## › Employment and Skills

### YOU SAID:

#### Application

- Approach is fraught with difficulties.
- CA must be aware that new construction apprenticeship frameworks are approx. 36 months in duration.
- Scale of the development must be such that it allows employment for at least this period of time to allow completion of training and qualification.
- Issues with policy approach applied in London which is a policy by borough approach and questions effectiveness.
- Must be aligned with a wider strategy to encourage skills-based training so there are job-ready applications when development commences.
- Local Employment Strategy could be an alternative to levy by ensuring development proposals are supported and apply a 'best endeavours' approach.
- Commit developers to approach Local Employment Partnership and Local Job Centres to fill vacant roles.

### WE DID:

Although the updated SDS no longer specifies construction apprenticeships against a specific threshold based on feedback and evidence, please refer to our current engagement, particularly our proposed development principles related to **LCR DP3 Economic Prosperity** and **LCR DP16 Delivering Social Value**.

YOU SAID:	WE DID:
<ul style="list-style-type: none"><li>• Not being able to find the right candidates should not prevent development going ahead in a timely manner.</li><li>• Need to understand skills and trades are required now and in the future.</li><li>• Evaluate courses and their content available in FE colleges.</li><li>• Define what the 'proportion' is that is objectively calculated and can be feasibly provided.</li><li>• Small housebuilders are likely to struggle more as they depend on sub-contract labour and as a result have limited control over training and employment.</li><li>• Some SME housebuilders are not interested in growth and therefore less likely to be interested in whether the apprentice stays or leaves the company.</li><li>• Should be sufficiently strong on the need for skills to deliver a green economy and those linked with a low carbon economy.</li><li>• Policy infers that strategic development proposals would be required to deliver opportunities for apprenticeships, but isolation is misplaced.</li></ul>	

YOU SAID:	WE DID:
<p><b>Threshold</b></p> <ul style="list-style-type: none"> <li>• Clear definition and details on what developments are required to meet the policy.</li> <li>• Consideration of whether major developments (development over 10 homes or a site larger than 0.5 hectares as per the NPPF) is the right threshold. Higher threshold of 15-25 or more homes likely a more appropriate threshold</li> <li>• Schemes of 50 homes or fewer should be exempt as it may not be possible to provide apprenticeships due to smaller timescales and reliance on sub-contractor labour.</li> <li>• Detailed approach should be set locally to reflect local circumstances, priorities, and opportunities.</li> <li>• Negotiations can take place on a site-by-site basis depending on local circumstances and opportunities.</li> </ul>	<p>Please read the response above on thresholds and changes to the structure and policy approach of the SDS since the last engagement.</p>

## YOU SAID:

### Type of employment

- General agreement and support for the policy approach but should go beyond apprenticeships. Apprenticeships are not always a suitable route for certain sectors and careers.
- Further emphasis should be placed on employment skills related to 'green' jobs and apprenticeships, low carbon economy and green economy.
- Policy approach should encourage new manufacturing to come to the area by providing factories in good locations and colleges to train the workforce.
- Marine related employment should be considered.
- Must relate to sustainable development that does not cause wider damage.
- Policy approach should be applied across a variety of sectors within the region with support given for local organisations and employers to provide wider range of sustainable employment training and employment.
- Consider prioritising upskilling young workforce and reskilling older workforce.
- Link to Adult Skills Budget and apprenticeships funding should be directed towards training and retraining to support a low-carbon future (retrofitting, zero-carbon construction, energy, and transport).

## WE DID:

Key sectors for growth have been identified in LCR DP3 Economic Prosperity which includes the opportunity of 'green' jobs.

Further support is provided for education and skills as part of the key dimensions for LCR DP16 Social Value.

Given the timeline of the SDS, we have refrained from providing links to the most recent Government budgets in order to ensure that this information is not outdated when it comes to publication. However, internal teams within the LCRCA such as Employment Skills regularly review these funding streams.

YOU SAID:	WE DID:
<p><b>Non-planning related comments</b></p> <ul style="list-style-type: none"> <li>• No specific reference as to how training will be undertaken (educational and/or training institution) despite considerable focus placed on the need to develop suitable skills in justification material.</li> <li>• LCR Skills Strategy (2018-23) or Apprenticeship Growth Plan (2018-20) are weaker on need for skills to deliver a green economy, causing SDS to overly rely on insufficiently ambitious related policy areas become compromised.</li> <li>• No reference in Strategy or Plan to carbon literacy.</li> <li>• Training &amp; skills development - bring youth and seniors together to learn from each other.</li> </ul>	<p>We would like to take this opportunity to thank you for comments. However, these are matters which cannot be directly influenced by the SDS.</p>
<p><b>Further policy coverage</b></p> <ul style="list-style-type: none"> <li>• Marine related employment such as new technologies, regeneration, diversification of opportunities should be considered</li> <li>• Policy focus should be broadened beyond apprenticeships.</li> <li>• Adopt a Strategic Infrastructure Levy to raise payments from the construction sector to support young entrants during their courses and gaining experience.</li> </ul>	<p>Support for identified sectors and high quality employment opportunities have been addressed in <b>LCR DP3 Economic Prosperity</b> and <b>LCR DP16 Delivering Social Value</b>.</p> <p>Securing contributions through mechanisms such as a Community Infrastructure Levy has been addressed in <b>LCR DP9 Infrastructure Provision</b>.</p>

YOU SAID:	WE DID:
<p><b>Viability</b></p> <ul style="list-style-type: none"> <li>• Assumption that the potentially significant on-costs through this requirement would form part of the “policy on” viability assessment of Local Plan requirements.</li> <li>• Ensure that it would not impede otherwise deliverable schemes that are acceptable through the planning framework.</li> </ul>	<p>As set out in the SDS Viability Information Note (2023), in preparing the SDS Viability Assessment (that will be prepared to support the Draft SDS) it will be necessary to establish any viability implications of SDS policies having regard to the approach and likely requirement within the respective Local Authority areas.</p>
<p><b>Policy approach</b></p> <ul style="list-style-type: none"> <li>• One-sided approach that assumes that developers would manage the wider process.</li> <li>• This could have serious impediment to the delivery of new homes and employment that underpin Plan-led objectives.</li> <li>• General support for the need for policy approach for apprenticeship programme to build on foundational training within and beyond City Region</li> <li>• Policy approach should be supportive in nature and set a high-level common framework, so developers know what is to be expected in principle.</li> <li>• Agreement that housebuilders can do more to support apprenticeships but note key barriers are resources and costs, with implications for other policies.</li> <li>• Confidence in developers to apply ‘best endeavours’ approach to policy.</li> <li>• Development proposals inside and outside of the City Region should also support apprenticeships in neighbouring authority areas.</li> </ul>	<p>Based on the comments gathered, we reviewed the implementation of the policy approach at the previous phase of engagement and revised our approach to employment and skills. Please see <b>LCR DP3 Economic Prosperity</b> and <b>LCR DP16 Delivering Social Value</b> for further information.</p>



### YOU SAID:

#### Policy approaches

- Generally supportive and agree with policy approach.
- Common City Region approach to gigabit connection would be beneficial.
- Should align and connect with similar programmes beyond City Region.
- Small amounts of bandwidth used for business and economy purposes, mainly used for entertainment.
- Delivery programmes may target certain areas as priority for delivering digital infrastructure (such as remoter rural areas). This may not align with the areas that are most in need of new housing provision.
- Recognition of the significance of connectivity and the infrastructure needed to provide it across the City Region to secure competitive advantage.
- Policy approach should be flexible and a matter for local planning authorities (LPA) to decide on a site-by-site basis.

### WE DID:

Recognising connectivity's importance, a flexible policy approach, alignment with housing delivery and addressing digital connectivity issues such as digital inclusion has been addressed in **LCR SS1 Liverpool City Region Spatial Strategy, LCR SP4 Strategic Infrastructure** and **LCR DP3 Economic Prosperity**.

YOU SAID:	WE DID:
<p><b>Policy approaches</b></p> <ul style="list-style-type: none"> <li>• Concern that the policy may lose its flexibility if consideration is not given to what might be appropriate if gigabit capability is not achievable at a local level.</li> <li>• Does not cover existing digital connectivity issues.</li> <li>• Work with providers of digital infrastructure and services (especially Open Reach) to ensure that their investment programmes align with the ambition of the LCRCA in this respect.</li> <li>• Emphasise link between design of the environment, digital connectivity and the development and delivery of services such as heat, energy, and utilities.</li> <li>• Connectivity ties together other policy aspirations in terms of social inclusion, climate change and smart transport.</li> </ul>	

## YOU SAID:

### Requirements and applications

- Reasonable and constructive approach to feasibility and appropriateness of all major developments to deliver gigabit capability.
- Consider constraints to functionality and deliverability as a result of infrastructure.
- Ensure that local providers are fully engaged to determine if this is possible at set locations and necessary for effectiveness.
- Not within developers' power to deliver these requirements alone.
- Requires a gigabit connection requirement for specified thresholds and types of residential development.
- Ensure it is in place before occupation. If unviable, then the next fastest broadband speed is required.
- Concerns about pace of delivery may not keep pace with housing growth.
- Prioritised for delivering digital infrastructure may not align with areas most in need of new housing provision.

## WE DID:

The provision of new and upgraded digital connectivity infrastructure and its delivery has been addressed in **LCR SS1 Liverpool City Region Spatial Strategy** and **LCR SP4 Strategic Infrastructure**.

As part of our ongoing engagement with statutory consultees, providers have been engaged on the proposed policy approach and have confirmed deliverability. Additionally, as part of the preparation of the LCR SDS Initial Engagement Infrastructure Plan (2023), engagement was undertaken with relevant stakeholders to discuss digital infrastructure requirements.

By promoting the dig once principles, will help minimise disruption and reduce incremental costs.

## YOU SAID:

### Connectivity

- Support for enhanced use of digital networks.
- Impact of Covid-19 has seen dramatic shift in working practices but face-to-face interaction still more important.
- Improving digital infrastructure has enabled remote working which has impact on reducing travel demands.
- Does not tackle existing inequalities and digital exclusion.

## WE DID:

Further consideration for tackling digital inequalities has been addressed in **LCR DP3 Economic Prosperity**. The LCR SDS Initial Engagement Infrastructure Plan (2023) has assessed digital and telecommunications infrastructure in the city region and planned improvements to reach those who are digital excluded.

Wider Combined Authority initiatives and programmes seek to tackle digital exclusion. An example of a recent digital inclusion initiative can be read [here](#), where more than 4,500 people are to receive free tablets, connectivity and training to tackle digital exclusion in the Liverpool City Region.

The LCR Digital Strategy and Action Plan, which is in the process of being updated, sets out how the city region will achieve its ambition to become the UK's most digitally connected and inclusive city region, that maximises the benefits of digital for all of its businesses, residents, and communities.

YOU SAID:	WE DID:
<p><b>Thresholds</b></p> <ul style="list-style-type: none"> <li>• Clarification required about thresholds and types of residential and non-residential proposals.</li> <li>• Requirement for gigabit connection for all developments may not be achievable.</li> <li>• Concerns about the implementation of gigabit connection for specific thresholds and types of residential and non-residential development prior to occupation</li> <li>• Responsibility for this type of connection to ensure timely occupation of homes and businesses belongs to the utility undertaker rather than developer.</li> </ul>	<p>Thresholds for delivering gigabit connection have been removed, and increased access to digital networks has been refocused in accordance with <b>SDS Objective 3</b>. Digital connectivity is now covered in <b>LCR SS1 Liverpool City Region Spatial Strategy, LCR SP4 Strategic Infrastructure</b> and <b>LCR DP3 Economic Prosperity</b>.</p>

YOU SAID:	WE DID:
<p><b>Viability</b></p> <ul style="list-style-type: none"> <li>• Costs of policy approach should be incorporated as part of the ‘policy on’ viability appraisal.</li> <li>• Ensure policy does not require potentially lengthy, complex, and costly demonstrations and assessment of the viability and feasibility for any individual development scheme.</li> <li>• Requirements should be viability tested to ensure that the costs of providing such infrastructure do not impact on the delivery of new homes.</li> <li>• Affordability of end use and access is an important consideration.</li> <li>• Must reference viability and feasibility.</li> </ul>	<p>As set out in the SDS Viability Information Note (2023), in preparing the SDS Viability Assessment (that will be prepared to support the Draft SDS) it will be necessary to establish any viability implications of SDS policies having regard to the approach and likely requirement within the respective Local Authority areas.</p>
<p><b>5G Network</b></p> <ul style="list-style-type: none"> <li>• Consideration of the practical constraints and necessities (design, siting, height) of 5G infrastructure in terms of functionality and deliverability</li> <li>• Older guidance related to function deployment of digital infrastructure is outdated when considering 5G.</li> </ul>	<p>At this stage, the SDS does not propose to cover 5G infrastructure. However, the Combined Authority is considering the development of Supplementary Planning Guidance.</p>
<p><b>Further policy coverage</b></p> <ul style="list-style-type: none"> <li>• Should instead include an aspiration to deliver a gigabit internet connection for all developments but should not be a requirement.</li> <li>• Include guidance that explains many of the practical elements associated with digital infrastructure deployment Include what the threshold will be and to which types of residential development it will apply.</li> <li>• SPG to explain and discuss practical elements associated with 5G infrastructure deployment and recognise its socio-economic benefit.</li> </ul>	<p>The Combined Authority is considering the development of a formal Supplementary Planning Guidance on specified subjects to assist in decision making and planning including a Digital Infrastructure SPG.</p>

## ➤ Social Economy

YOU SAID:	WE DID:
<p><b>Policy approach</b></p> <ul style="list-style-type: none"><li>• Lack of clarity and its ‘fit’ with the proposed delivery mechanism</li><li>• Unclear whether the policy is seeking to provide support for their ambitions and programmes or to safeguard land for the uses these sectors currently undertake.</li><li>• Query whether existing mechanisms (such as Assets of community Value, Village Greens, or Protected Open Space) may be more applicable than any new policy approach.</li><li>• Define what the ‘new social economy uses’ will be.</li><li>• Policy approach should be more strongly worded: ‘to prevent’.</li><li>• Broadly welcome the approach.</li></ul>	<p>Further clarification including how we define social economy has been addressed in <b>LCR DP4 Economic Prosperity</b>.</p>

## YOU SAID:

### Application

- Criteria for social value and greening spaces underpinning planning process would support social organisations.
- Clarify the purpose and implementation approach of the policy.
- Consideration for the difference in power and influence between a social enterprise and a large commercial company during the planning application process
- Social businesses and activities that are held in low quality buildings are vulnerable to redevelopment.
- Example of Rimrose Valley and the access road being handed over to developers despite its multiple use by the community and voluntary groups.
- Should be doing more to protect the land and acknowledge the impact of the port's operations in Sefton.
- Rent increases and gentrification push community projects out of poor areas.

## WE DID:

Considering the role of the social economy and measures to help protect their uses has been addressed in **LCR DP3**

### **Economic Prosperity.**

Opportunities to maximise social value has been addressed specifically in **LCR DP16 Delivering Social Value**. In addition, a Social Value Assessment has been carried out which ensures policies take account of wider community benefits and social aspects, particularly **LCR DP3 Economic Prosperity** in relation to social organisations.

In relation to gentrification, the SDS acknowledges the need for regeneration in **LCR SS1 Liverpool City Region Spatial Strategy** in terms of delivering adequate homes and the social impact assessments for new developments.



YOU SAID:	WE DID:
<p><b>Importance of Social Economy</b></p> <ul style="list-style-type: none"> <li>• Social enterprises provide vital services and good quality employment across the City Region</li> <li>• Social economy has a huge role to play within communities and bridges gaps between local authorities and the communities.</li> <li>• Community sports clubs contribute towards the local economy and provide community resources, though on limited income, so it is important their facilities are protected and enhanced.</li> <li>• LCR will be unable to achieve an inclusive economy due to difficulties for community-led organisations to deliver large-scale projects as local council projects receive priority funding for underutilised and underdeveloped spaces.</li> <li>• Sports clubs are included in this category. Some have Community Amateur Sports Club (CASC) status and registered with HMRC. There are 75 CASCs and one key condition is that the club is open to the whole community.</li> </ul>	<p>The importance of the Social Economy and its contribution to both the wider economy and communities has been addressed in <b>LCR DP3 Economic Prosperity.</b></p>
<p><b>Non-planning related matters</b></p> <ul style="list-style-type: none"> <li>• Long-term leases should be made available or ensure that change of use cannot happen between leases.</li> <li>• Only allow redevelopment if the users are provided with suitable alternative accommodation during construction and equivalent accommodation in new buildings are the same price</li> </ul>	<p>We would like to take this opportunity to thank you for your comments. However, these are matters which cannot be directly influenced by the SDS.</p>

### YOU SAID:

#### Policy approaches

- Policy approach should also consider the role of planning in supporting sustainable farming, farm viability and a diverse rural economy.
- Should be left to national policy.
- Unclear if purpose of the policy is to prevent development on farmland or to restrict how such land should be managed.
- Monitoring indicators do not go far enough as watching the amount of good quality land dropping or tracking local emissions do not provide benefits to those in need.
- Policy is lacklustre and uninspiring and fails to act upon the proposed strategies and aims of the SDS.
- Fails to acknowledge benefits of increased crop growing to local people and City Region
- Rural sports and leisure facilities have not been included.
- A requirement for development to provide robust evidence base and field surveys were necessary would be welcomed.
- Policy needs to be flexible to reflect change in farming operations and subsidies change.
- Policy approach does not reflect the policy heading.

### WE DID:

Further clarification including supporting rural economic development, diversification, opportunity, quality service access, and preserving and enhancing the natural, historic, and cultural environment have been addressed in **LCR SP10 Rural City Region.**

In addition, please refer to **LCR SS1 Liverpool City Region Spatial Strategy.**

The SDS will be accompanied by a monitoring framework which sets out monitoring indicators that will report on the progress made following the preparation and implementation of the SDS. Upon adoption of the SDS, Authority Monitoring Reports will be published to show the progress made and can help inform if an update is required of the SDS.

YOU SAID:	WE DID:
<p><b>Impact of Brexit</b></p> <ul style="list-style-type: none"> <li>Concerns about Brexit as farmers will be paid to look after environment rather than farming intensively.</li> <li>Food security should be a top priority as a result of Brexit and impacts of climate change and best farmland should be protected</li> <li>National agriculture policy impact due to Brexit. Agree in principle but should link with natural environment and GI policy.</li> </ul>	<p>Although not explicit to the impact of Brexit, please see our current engagement, in particular our proposed spatial priority relating to <b>LCR SP10 Rural City Region</b> which provides support to the long-term sustainability of communities, the economy and the environment.</p>
<p><b>Use of land</b></p> <ul style="list-style-type: none"> <li>Policy should include all Grade 3 land as most land has not been assessed to subgrade.</li> <li>Best quality land should not be developed on to cater for future food supplies.</li> <li>Manufacturing and warehousing may be the best use of land in certain areas.</li> <li>Presents narrow view of potential land use and does not allow for other potentially more important benefits such as flood management or carbon sequestration.</li> <li>Does not add any further value to national approach to BMV.</li> <li>BMV is a constraint when allocating land and determining planning applications, so policy approach is not justified to specify BMV only.</li> <li>Pressure to use prime agricultural land elsewhere will be reduced if the City Region can meet its own housing needs.</li> <li>Farmers struggle to find suitable land for small-scale commercial growing as it is used for housing developments.</li> <li>Must be flexible to allow farm businesses to invest and adapt to new supply change demands or market opportunities.</li> <li>Interdependency between BMV land functionally linked habitat and afforded protection under Habitats Regulation Assessment should be considered and link with natural environment and green infrastructure policy areas.</li> </ul>	<p>Consideration for the role and protection of BMV land and the location of residential and employment uses are considered in <b>LCR SP10 Rural City Region, LCR SP1 Strategic Housing Need and Distribution</b> and <b>LCR SP2 Strategic Employment Land Need and Distribution</b>.</p> <p>In line with national policy, the SDS will be responsive to local circumstances to enhance and/or maintain the vitality of rural communities and for farm businesses to grow and thrive.</p>

YOU SAID:	WE DID:
<p><b>Food security</b></p> <ul style="list-style-type: none"> <li>• Policy approach needs to recognise the need to protect land from flooding.</li> <li>• Food security should be managed at a national level rather than locally.</li> <li>• Creating specialised protected regional food is the only way agricultural can ensure the growth of the local economy.</li> <li>• Farming is not profitable due to how food systems operate.</li> <li>• Policy approach doesn't embrace all issues normally associated with the rural economy in terms of food security and production.</li> <li>• Recognise the importance of agricultural and rural businesses in the City Region.</li> </ul>	<p>The importance of food security in the rural economy has been addressed in <b>LCR SP10 Rural City Region</b>, with further support for improving food security by supporting food producing opportunities addressed in <b>LCR DP4 Promoting Health and Wellbeing</b>.</p>
<p><b>Non-planning related matters</b></p> <ul style="list-style-type: none"> <li>• Consider changes to agricultural funding in the future.</li> <li>• Invest in initiatives for high-quality land to actively benefit local people.</li> <li>• Policy approach should consider changes to agricultural funding in future as subsidies move to support public goods and farmers will need to flexibly adapt their operations.</li> </ul>	<p>We would like to take this opportunity to thank you for your comments. However, these are matters which cannot be directly influenced by the SDS.</p>

## YOU SAID:

### Further policy coverage

- Recognition of the need to protect agricultural land from flooding.
- Implementation of a broader system of monitoring.
- Covering local food availability/quantity of locally grown food, hunger levels, rural/agricultural job numbers, and the amount of best and most versatile land not currently in use for food production.
- Expand policy approach to encompass the protection, enhancement, and provision of other rural economic activities.
- Approach could reference fisheries and aquaculture marine plan policies, with reference to the marine area alongside terrestrial agricultural land.

## WE DID:

Please see our current engagement, in particular our proposed spatial priority relating to **Rural City Region**.

The importance of protecting agricultural land from flooding, monitoring system, and the expansion of policy to include rural economic activities have been addressed in **LCR SP10 Rural City Region**.

The SDS does not explicitly address the listed marine plan policies; instead, the SDS seeks alignment with and mentions the Northwest Marine Plan, with which we will continue to engage the Marine Management Organisation as part of policy development.

## Design Quality

YOU SAID:	WE DID:
<p><b>Requirements</b></p> <ul style="list-style-type: none"><li>• General support for policy approach which requires high quality design for new developments.</li><li>• Warn against onerous requirements or design guidance that is overly prescriptive without considering viability or practical implementation.</li><li>• Development industry must be fully engaged in the preparation of any design guidance.</li></ul>	<p>The requirements for delivering well designed and high quality buildings and places have been addressed in <b>LCR DP6 High Quality Design.</b></p>

## YOU SAID:

### Methods and tools

- SDS should set out over-arching principles (linked to the National Design Guide's 10 characteristics), with detailed approach set locally.
- Higher priority should be given to innovative and sustainable design, landscaping, and heritage.
- Surface water should be managed as close to its source as possible and on the surface where practicable to do so to promote water efficiency.
- Environmentally sustainable design such as rainwater recycling, green roofs, water butts and permeable surfaces to be encouraged.
- Pedestrian and cycle-friendly layouts and streets that are more about play than cars should be encouraged.
- Important that use of tools is not at the expense of promoting local character and distinctiveness of LCR Landscape Character Assessments, Heritage Appraisals and Conservation Area Appraisals all have a role to play in understanding local context and setting.
- Necessary for all parties to provide early and pragmatic engagement realise positive outcomes of design tools.
- Tools would be too prescriptive and may have significant resource implications.
- Green and blue infrastructure with high quality landscaping should co-exist alongside sustainable drainage systems.

## WE DID:

To ensure sustainable development, **LCR DP6 High Quality Design** has offered a range of methods to deliver good design.

**LCR SP9 Culture, Tourism and Visitor Attractions, LCR DP14 The Historic Environment, LCR DP4 Promoting Health and Wellbeing, and LCR DP13 Water Management and Flood Risk** provide further policy coverage on design based on comments received relating to the particular themes raised.

Please refer to our spatial development strategy for the Liverpool City Region in **LCR SS1 Liverpool City Region Spatial Strategy**, which places a strong emphasis on high-quality design as one of its guiding principles.

YOU SAID:	WE DID:
<p><b>Design Review Panel</b></p> <ul style="list-style-type: none"> <li>• Danger that Design Review Panel may not reflect public tastes and preferences.</li> <li>• Design Panel and Officers should consider the City Region design guidance and views of the public.</li> <li>• Design Officers or Independent Design Panels could be used at pre-application stage.</li> <li>• Panel presents a risk that design choices may be subjective.</li> </ul>	<p>Design Review Panels is one suggested tool which can be used to guide the design of development and have been included within <b>LCR DP6 High Quality Design</b>. However, this is accompanied by other measures set out within the policy.</p>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• Strategic allocations will need to be assessed through an appropriate evidence base to evaluate their impact on the significance of heritage assets.</li> <li>• If harm is identified, sites should only be included where appropriate and effective avoidance and mitigation measures have been identified.</li> <li>• Design policies should set a positive strategy and build on the opportunities that the City Region provides to enhance local character and distinctiveness.</li> <li>• Include a description of the historic environment and its contribution to the area including the historical growth of the city, key features of the present historic environment, its distinctive character and identity and identify elements at risk.</li> </ul>	<p>A design led approach has been suggested in <b>LCR DP6 High Quality Design</b> which require consideration for circumstances that will have a negative impact on heritage assets. In supporting and further policy coverage on heritage assets, please refer to <b>LCR SP9 Culture, Tourism and Visitor Attractions</b> and <b>LCR DP14 The Historic Environment</b>.</p>



YOU SAID:	WE DID:
<p><b>Further policy coverage</b></p> <ul style="list-style-type: none"> <li>• SPD to incorporate the emerging Green Infrastructure Standard in Design Guidance/Codes.</li> <li>• Policy to cover an integrated view to the whole LCR, such as not making good city centre development unviable by cutting height due to localised context when the grander context should be city centre/waterfront area.</li> <li>• Beneficial to add in 'active design' principles.</li> </ul>	<p>Given the local nature of design, local level supplementary planning documents for the local authority area should be prepared. <b>LCR DP6 High Quality Design</b> recognises that each part of the City Region has its own distinctive character, and all designs must complement these variations and ensure new proposals are grounded in local context.</p> <p>The Active Design principles has also been addressed in <b>LCR DP6 High Quality Design</b> to help promote healthy lifestyles.</p>
<p><b>Non-planning related</b></p> <ul style="list-style-type: none"> <li>• Review Conservation Area Appraisals and Management Plans.</li> </ul>	<p>We would like to take this opportunity to thank you for your comments. However, the review of Conservation Area Appraisals and Management Plans is not a function for the Combined Authority.</p>

## › Housing Standards

YOU SAID:	WE DID:
<p><b>M4(2) and M4(3)</b></p> <ul style="list-style-type: none"><li>• General support to ensure delivery of quality homes.</li><li>• Do not oppose optional standards like Parts 2 and 3 of M4 building regs and NDSS (where standards are justified) do not prohibit development viability and deliverability.</li><li>• Should require M4(3)a only rather than M4(3)b unless it is being built for a particular end user in mind M4(3) b will only apply to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.</li><li>• Have regard to Government’s accessible standards proposals and the PPG regarding M4(3).</li></ul>	<p>Setting a requirement for meeting accessibility and adaptability for wheelchair users in accordance with Parts M4(2) and M4(3)(2)(a) of the Building Regulations 2010 has been addressed in <b>LCR DP2 Sustainable and Inclusive Communities</b> which takes into consideration site-specific factors and local viability evidence.</p> <p>In relation to standards being set, including the Nationally Described Space Standard (NDSS) are to be dealt with through the LCR Local Plans.</p>

## YOU SAID:

### Standards

- General support measures such as tree planting, external amenity space, cycle storage and electric charging points.
- Must avoid being overly prescriptive and standards to be applied in different boroughs will need to be justified.
- Policy may be unnecessary if NDSS become mandatory via building regulations.
- Have regard to PPG tests, viability, and impact on housing affordability if policy approach goes ahead.
- Tree planting could assist developers meeting some biodiversity net gain obligations; however some local planning authorities have moved beyond tree planting towards landscaping.
- Viability needs to be considered - refers to individual dwellings rather than overall development.
- Urge caution in introducing standards that are controlled by other legislation Policy does not provide holistic approach.
- Housing standards need to be measurable and defined in advance to ensure deliverability.
- Housing standards must be of technical and measurable basis.
- Policy approach should be over-arching principle with detailed approach and standards being set locally.
- Standards should consider beyond tree planting and consider other habitats that will enhance quality of space, encourage biodiversity and fix carbon.

## WE DID:

Consideration of support measures including tree planting, external amenity space, cycle storage, and electric charging points, have been addressed in **LCR DP2 Sustainable and Inclusive Communities**.

As set out in the SDS Viability Information Note (2023), in preparing the SDS Viability Assessment (that will be prepared to support the Draft SDS) it will be necessary to establish any viability implications of SDS policies having regard to the approach and likely requirement within the respective Local Authority areas.

YOU SAID:	WE DID:
<p><b>Impact on new homes</b></p> <ul style="list-style-type: none"> <li>• Concern whether additional onerous policy obligations is sensible given likely increase in timescales to determine applications and the delivery of new homes.</li> <li>• Ensure new housing is built to meet the right needs in the right locations.</li> </ul>	<p>Delivering new housing in the right locations to meet different needs have been addressed in <b>LCR SP1 Strategic Housing Need and Distribution</b> and <b>LCR DP2 Sustainable and Inclusive Communities</b>.</p> <p>The list of housing standards proposed in the previous engagement have since been removed from the SDS with the exception of accessibility standards as the Local Authorities have their own set standards within their Local Plans.</p>
<p><b>Accessibility</b></p> <ul style="list-style-type: none"> <li>• Lack of accessible homes threatens homelessness</li> <li>• New builds have the potential to be built in an accessible way but are not being done so.</li> <li>• Accessible housing quota for new housing developments.</li> </ul>	<p>Accessible and adaptable homes have been addressed in to <b>LCR DP2 Sustainable and Inclusive Communities</b> supported by findings from the HEDNA.</p>
<p><b>EV charging</b></p> <ul style="list-style-type: none"> <li>• Have regard to the expected Government announcement on electrical vehicle charging point requirements in terms of costs and practical issues.</li> </ul>	<p>Infrastructure provision for electric vehicles have been addressed in <b>LCR SP4 Strategic Infrastructure</b> and <b>LCR DP10 Sustainable Transport and Travel</b>.</p>

YOU SAID:	WE DID:
<p><b>Application</b></p> <ul style="list-style-type: none"> <li>• Must sit alongside delivery of quality design that responds well to local site conditions and opportunities.</li> <li>• Rigorous application of the design codes</li> <li>• Ensure NDSS are applied to ‘co-living’ development.</li> <li>• Needs a commitment to contemporary architecture in its text</li> <li>• Bespoke assessment of housing needs is necessary, and standards will need to be justified and considering of need and viability.</li> <li>• BREEAM, HQM and CEEQUAL are schemes which can be used to ensure that the high-level principles of active design are met and implemented where possible during each stage of a project’s lifecycle.</li> <li>• Unwise for CA to introduce more demanding energy-efficiency standards especially where there are other competing policy objectives.</li> </ul>	<p>The importance of quality design, rigorous application of design codes, contemporary architecture, and active design principles have been addressed in <b>LCR DP6 High Quality Design</b> and <b>LCR DP2 Sustainable and Inclusive Communities</b>.</p> <p>Caution against introducing more demanding energy-efficiency standards has been considered and addressed in <b>LCR DP1 Planning for Climate Change, LCR DP4 Promoting Health, Wellbeing and LCR DP6 High Quality Design</b> and <b>LCR DP11 Energy</b>.</p>
<p><b>Further policy coverage</b></p> <ul style="list-style-type: none"> <li>• Policy should ensure efficiency of existing housing stock.</li> <li>• Recognition that retrofitting falls largely outside the remit of planning.</li> <li>• Ensure that whatever is used is regularly updated for changes in technology.</li> <li>• Provision for them to be applied retrospectively through retrofitting.</li> </ul>	<p>Retrofitting existing buildings is a matter which cannot be directly influenced by the SDS. However, support is given to the retrofitting of existing buildings in <b>LCR SS1 Liverpool City Region Spatial Strategy</b> and <b>LCR DP11 Energy</b> to improve their energy efficiency where planning permission is needed.</p>



**METROMAYOR**  
LIVERPOOL CITY REGION

➤ For more information on **Spatial Planning at the Liverpool City Region Combined Authority** or the **Spatial Development Strategy**

please visit:

[www.liverpoolcityregion-ca.gov.uk/sds](http://www.liverpoolcityregion-ca.gov.uk/sds)

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