

SDS Consultation Round 2

Policies Report

Report by:

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**EVIDENCE, RESEARCH
& INTELLIGENCE**

Summary and Key Takeaways



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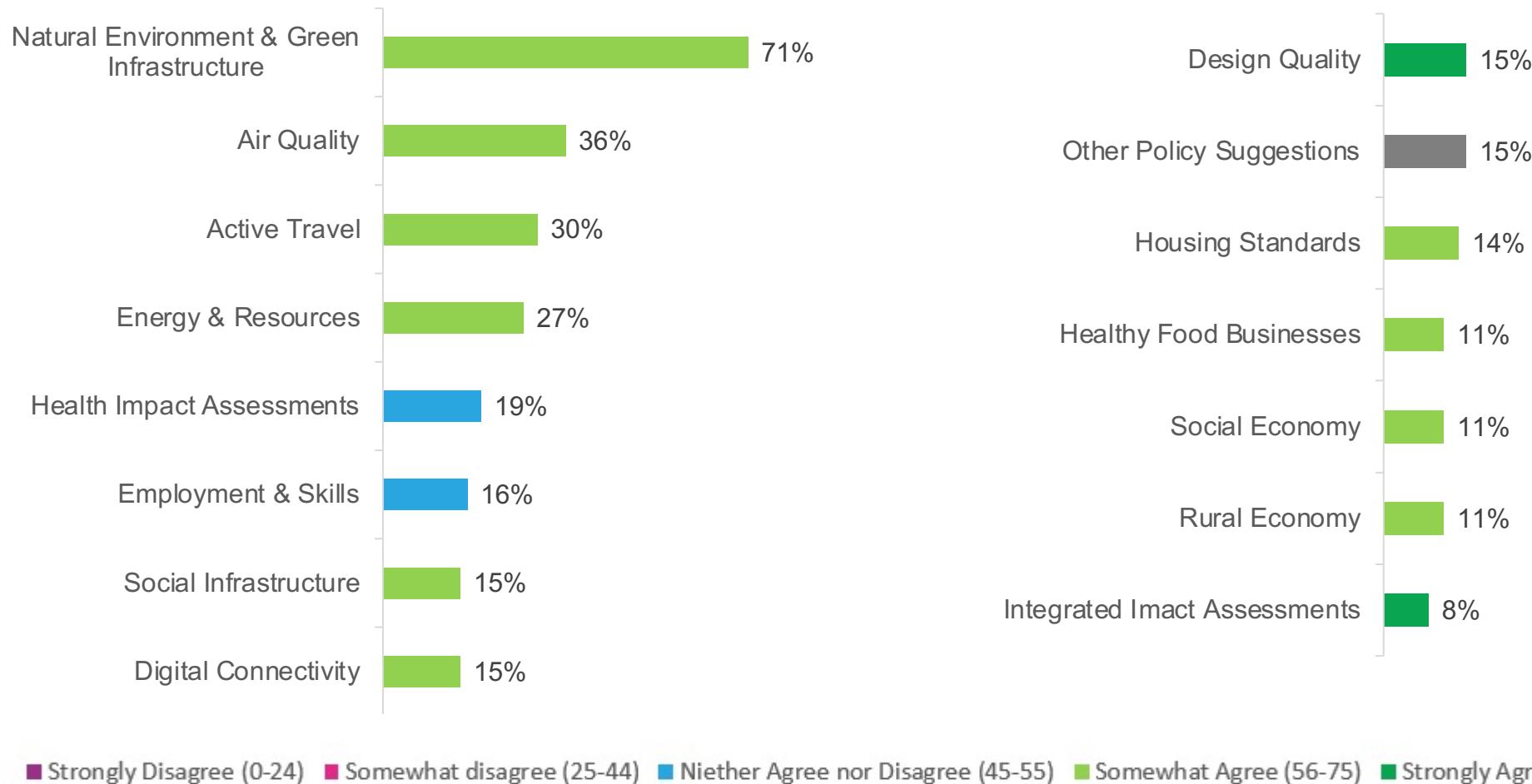
Summary

73 participants responded to all or part of the policy consultation questions, with varying levels of agreement mainly averaging as somewhat agree.

Some areas saw more responses than others, in part possibly due to methodology, with tiles fixed, potentially leading to more engagement with the upfront tiles presented on CommonPlace. The ordering on CommonPlace was:

1. Natural Environment & Green Infrastructure
2. Energy & Resources,
3. Air Quality,
4. Active Travel,
5. Health Impact Assessments
6. Healthy Food Businesses
7. Social Infrastructure
8. Employment & Skills
9. Digital Connectivity
10. Social Economy
11. Rural Economy
12. Design Quality
13. Housing Standards
14. Other Suggested Policy Ideas
15. Integrated Impact Assessment.

Summary: Level of Engagement



■ Strongly Disagree (0-24) ■ Somewhat disagree (25-44) ■ Neither Agree nor Disagree (45-55) ■ Somewhat Agree (56-75) ■ Strongly Agree (76-100)

Key Takeaways

Across the areas consulted on, there are some **key cross cutting takeaway themes**:

- Duplication & feasibility** – In a number of areas it was suggested that either there may already be similar assessments or policies, or that government changes may cover some of these areas. Caution was therefore given to, as much as possible, try and avoid any duplication or creating policies that may make otherwise good projects unfeasible. Consideration should be given to weighing up benefits with practicalities such as cost and skills availability.
- Elaborate, add more detail, definitions, and how things will be applied** – Whilst average scores showed agreement across the board to some level with the policies presented, there are a number of areas where it was felt that aspects needed more defining, more details, and explanations about application. Such concerns have been raised throughout the report where applicable.
- Protect and add to green spaces and environments** – Natural Environment was the most engaged with policy, however they were mentions of protecting green spaces and the wider ecosystem across a number of areas, including coastal, marine, and water ways. Many suggested not only protecting green spaces but also increasing provision, planting more trees, and protecting other ecosystems such as soils, hedges, flowers etc. Not to detract from this point but to add context to the results a number of people raised the Rimrose Valley protect in comments and thus there was also discussion about alternatives to road plans and the impact of the Port.

Continued: Key Takeaways

Across the areas consulted on, there are some **key cross cutting takeaway themes**:

4. **Support and encourage moving away from car use** – In parts this links into the idea of holistic planning seen in the Vision and Objectives. In a number of areas the topic was raised regarding designing and planning to reduce car use and make active travel and public transport more attractive. From, to name a few, improving infrastructure to reduce safety concerns, supplying electric charging solutions, or designing active environments/15minute cities (20minues neighbourhoods).
5. **Work with neighbours** – In a few areas it was noted to consider cross boundary working or implications of suggested policies on neighbouring areas such as Cheshire West and Chester. For example, in relation to restricting the apprenticeship policy to LCR residents could have an impact on our neighbouring populations work opportunities. Yet, on a positive note collaborating around cycling and walking infrastructure could help support active travel cross boundary.
6. **Consider including policies around older buildings** – There was some feeling that policies focused on new builds in places with questions raised about what the implications would be for stock already build. This mainly related to digital connectivity and retrofitting.
7. **Elaborate further on the circular economy** – In a few places there was mention to improve references and inclusion of the circular economy in the policy ideas.

Background & Methodology



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Background & Methodology:

Between October 2019 and January 2020, first round consultation took place on the SDS to help understand what people felt the main planning challenges facing the City Region were and what should be done to meet them.

Following on from this initial consultation in November 2020 a second round of engagement was launched to seek further views on proposals created for the SDS vision and objectives and several key policy areas.

This second round of consultation was hosted on CommonPlace, consisting of sliding agree scales and open questions. The consultation ran from Tuesday 10th November 2020 until Monday 1st February 2021.

This report looks at the findings from the policy engagement. 73 unique respondents took part.



The consultation ran from
Tuesday 10th November 2020 – Monday 1st February 2021.



The consultation took place
on CommonPlace

Policies



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Policies: Natural Environment & Green Infrastructure



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The Natural Environment and Green Infrastructure Policy Ideas

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

- Seek to ensure that Green Infrastructure is planned, designed and managed in an integrated way to achieve multiple benefits.
- Embed the ‘natural capital approach’ into plan and decision making, securing lasting benefits offered by the natural environment. This would utilise the LCR Natural Capital Baseline to prioritise and identify strategic opportunities for Green Infrastructure and habitat provision or improvement, and act as a consistent measure for achieving environmental net gain from new development.
- Support and identify opportunities for strategic tree planting and woodland creation in the City Region and ensure its lasting management.
- Reinforce the protection of the LCR’s network of green and open spaces and promote its improvement, ensuring new provision is accessible to communities and is of a high standard with lasting management in place.
- Reinforce the protection of the LCR’s sites of biodiversity and geodiversity value and promote their conservation and enhancement.

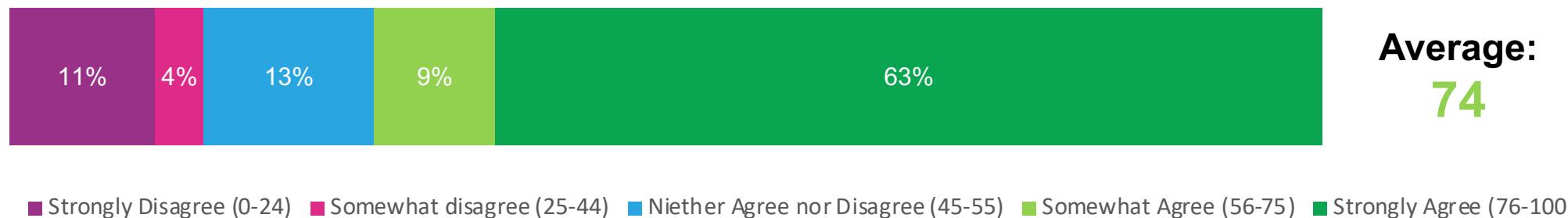
It would also:

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

Natural Environment and Green Infrastructure

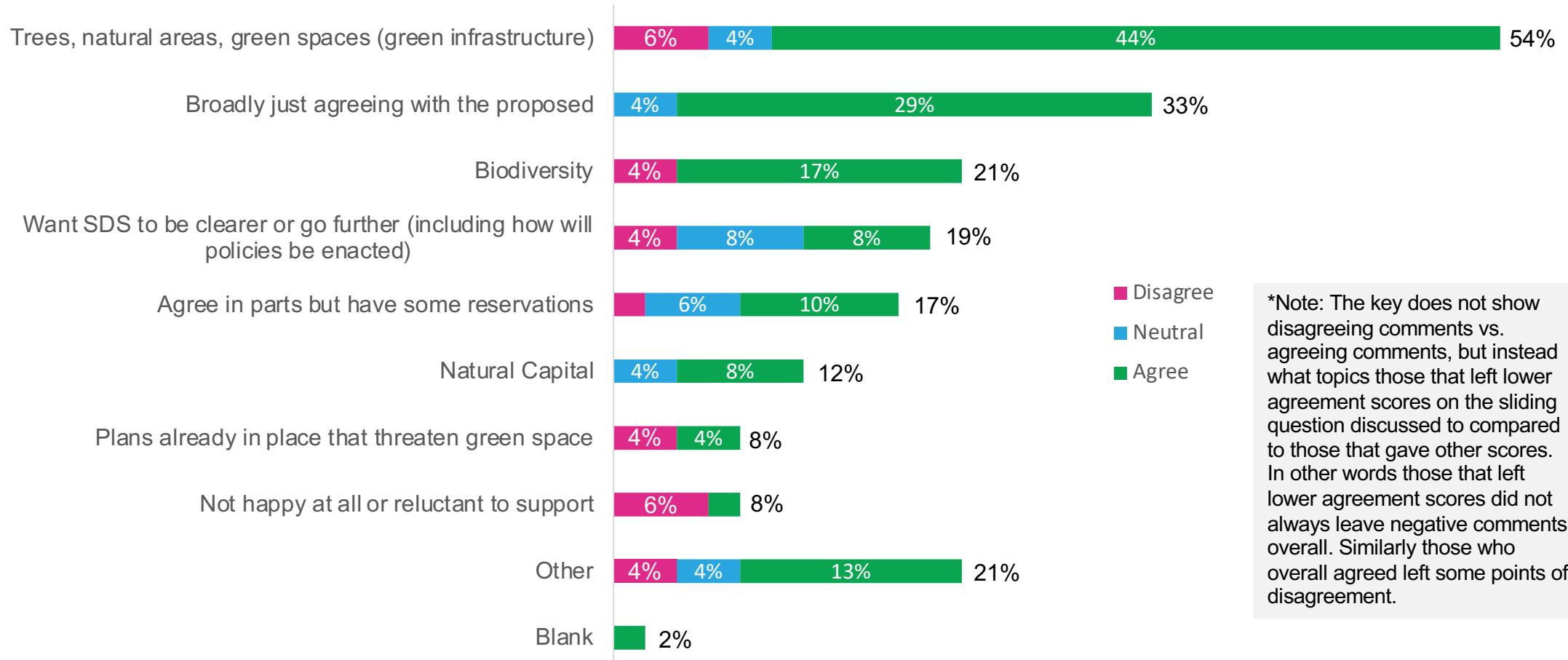
52 respondents engaged with the SDS policy regarding natural environment and green infrastructure. Overall the average agreement score was 74 out of 100 (somewhat agree).

Agreement with the policy



Continued: Natural Environment and Green Infrastructure

Why do you agree or disagree with this policy approach? – Broad Comment Topics Discussed



Continued: Natural Environment and Green Infrastructure

Natural environment and green Infrastructure was the most engaged with policy. Of the 52 respondents who engaged with this area, 39 somewhat or strongly agreed with the presented ideas and only 7 somewhat or strongly disagreed.

Broadly over half (54%) of the comments related to **green infrastructure; green spaces, natural areas, and trees**. Many highlighted the increased recognition of such areas as assets following the past year, with a few pointing out the importance of such space for health and wellbeing. Some want to see more spaces and more trees, whilst others want to see what we already have protected and maintained.

Those that gave more negative scores to the overall policy idea were not necessarily all in disagreement with what was presented in regards to green infrastructure (e.g. green spaces, natural areas, and trees). However, general concerns raised regarding this topic (by both those who agreed or disagreed) revolved around equality of access to quality green spaces, and location of trees.

It was highlighted that not all areas have the space to have green areas, and that furthermore there appears to be a an inequality in provision with poorer areas seemly to have poorer quality and maintained spaces compared to other neighbourhoods.

Planting more trees also raised some concerns with questions around where they would be expected to be planted. Consideration should be given to what land is suitable or not, for example, agricultural land and recreational sports ground may not be suitable.

Continued: Natural Environment and Green Infrastructure

Linking in with this area of discussion around green spaces and trees. 21% of comments left, regarding why people agreed or disagreed with the policy area, broadly related to the topic of **biodiversity**. Some felt the SDS should have a specific separate policy on this area, whilst other thought it needed to go further in general away from “arresting” the loss to “reversing” any loss.

Biodiversity overall was seen as important, with discussions around protecting soils, insects, and wildlife corridors. In generally some felt it should be the centre of importance in town planning.

Natural Capital was another broad topic raised across the comments. One or two discussed a Natural Capital Baseline the LCRCA may have done or is planning to do and suggested the data should be readily available for public use. Yet, mostly, for those that specifically mentioned Natural Capital they were looking for more clarity on the idea.

In general there were some more comments about wanted the **SDS to be clearer or go further, including in mentioning how policies will be enacted**. Some felt the proposed as stands was either vague, watered down, too high level, or in general could go further. Some felt it did not go far enough to contribute to immediate carbon reductions, and there was also a mention about including something within the SDS about our effects and responsibilities to planetary scale change.

Other comments, negatively discussed **plans that are already in place that threaten green spaces** (8%) these were left mainly by people who disagree with the policy as it stands as they feel these plans should be reversed.

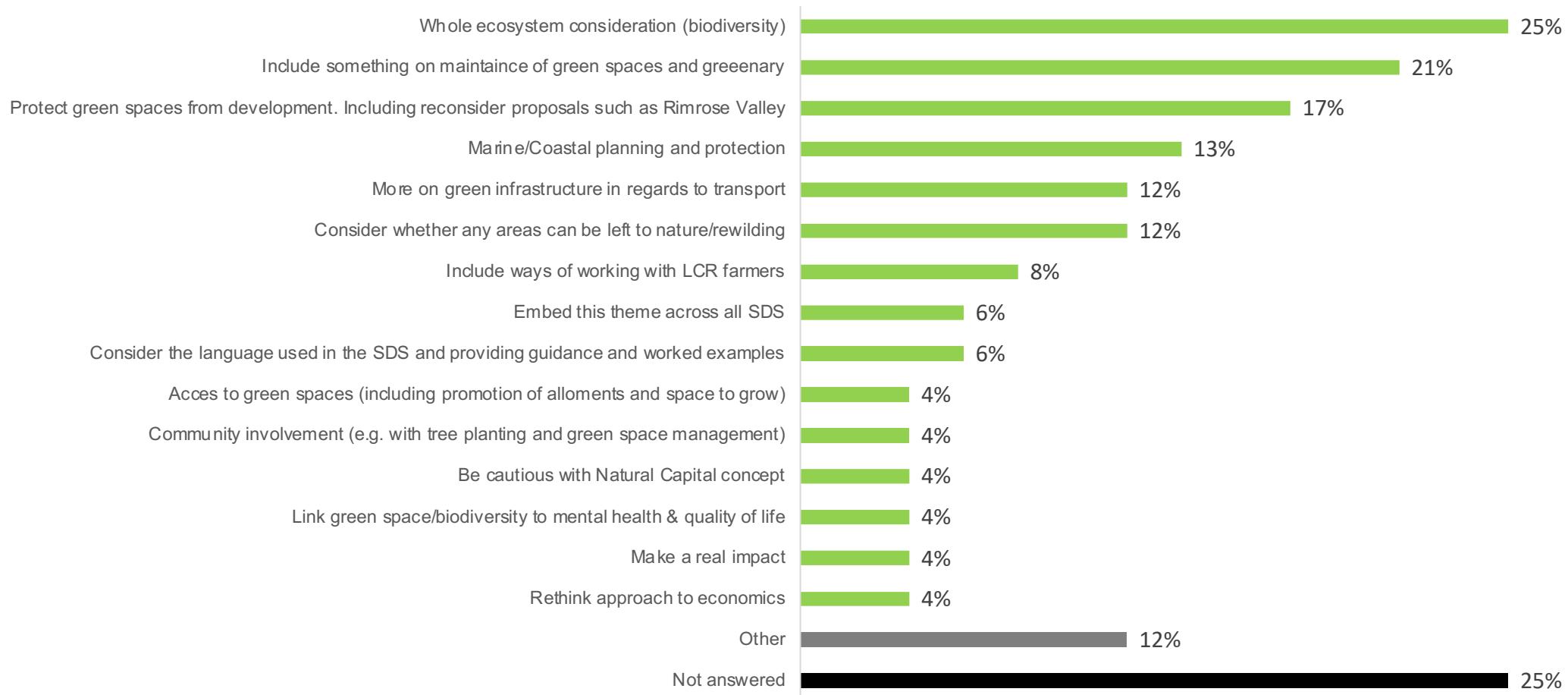
Continued: Natural Environment and Green Infrastructure

The remainder of comments either broadly agreed or disagreed without providing much more detail, or fell in the broad ‘other’ category (21%). Things within this category include, highlighting a specific issue of drainage in Sefton impacting access to parks, suggesting to be careful of recreating work that is already out there (e.g. Environment Agency has undertaken work throughout the Liverpool City Region to identify communities at risk from flooding), suggesting to focus on not doing things in some instances and letting nature recover and rebalance itself, suggesting rethinking the terminology being used as one respondent suggested all infrastructure should be ‘green’, being careful and thinking through what impact the policies may have (e.g. particularly on housing targets), and involving local people (e.g. in decision making and things such as tree planting).

Not all comments in the ‘Other’ category were negative a couple pointing out that the policies seem to complement other work already underway (e.g. Wirral’s Green & Blue Strategy)

Continued: Natural Environment and Green Infrastructure

Areas of improvement to the policy covered the following broad themes.



Continued: Natural Environment and Green Infrastructure

When asked specifically about what more the Natural Environment and Green Infrastructure policy should cover, a quarter (25%) made recommendations relating to **biodiversity** themes of taking the whole ecosystem into consideration. 6 noted that the policy should include something on protecting other carbon sinks outside of just trees, such as peat land and the marine environment. 5 felt planning requirements should make consideration and protection of biodiversity (for example, a couple suggested introducing a minimum of 10% biodiversity net gain targets for all developments with 20% for council land).

Other suggestions regarding biodiversity related ideas including, encouraging protection of endangered species and the re-introduction of lost species, updating the LCR ecological networks and highlighting gaps and opportunities to increase aspects, creating nature and wildlife corridors and expanding green spaces, extending and protecting woodland creation and tree planting to wildflower meadows, hedge planting, wetland creation and rewilding, minimising the sealing of natural ground surface, and stipulating that all developments should maximise both public and private green space, including encouraging green roofs and green walls.

In summary, the general consciences from the biodiversity related comments is that the natural environment needs to be seen and respected as an integrate whole and that the SDS should work on that basis.

Included in this is the suggestion that the SDS should have more emphasis on blue infrastructure (e.g. water bodies, wetlands, rivers, canals, and the sea). This idea links into another broad area raised in response to the question about what more the Natural Environment and Green Infrastructure policy should cover, that of **marine/coastal planning and protection** (13%).

Continued: Natural Environment and Green Infrastructure

Those who left comments that related to **marine/coastal planning and protection**, suggested that the SDS should mention the marine environment and marine planning/ natural coastal capital and protect it from harmful development. Specifically in relations to the docks. Some suggested looking into limiting imports through the docks (particularly of globally damaging products) and rethinking access to the docks. In general taking into consideration the impact of the docks on the natural environment and green infrastructure.

Another topic area that attracted much comment was that of including something in the SDS on **maintenance** (21%). For example, not over maintaining or clearing trees, maintaining walls and paths, encouraging people to look after places, restricting the use of pesticides and herbicides, encouraging rewilding, having a policy that addresses excessive mowing and spraying road verges and traffic islands, and not allowing netting to be used on greenery as it traps birds. Related to this, there were also comments made about considering if any areas can be **left to nature or rewilding** (12%).

For those that **cautioned the use of Natural Capital** as a concept (4%), one respondent had concerns it would validate continued use of fossil fuels, whilst another felt it may deepen inequality.

For those that felt the approach to **economics needs rethinking** (4%) one respondent suggested considering ‘doughnut economics’, whilst another chose to highlight the belief that growth is not an aim which relates to people’s lives. These are not the only suggests seen to rethink economics and the approach to growth, with some similar suggests seen in the vision and objective findings.

Lastly, a few comments were made highlighting the importance of making sure the policy creates **real impact** (4%), delivery over just monitoring, and including something on leaving the land and environment in a better state for future generations instead of just limiting damage.

Continued: Natural Environment and Green Infrastructure

For the comments that fell in the '**other**' category the topics were broad with suggestions to including something on green jobs/training, linking into waste management, creating spaces in farmland for more tree cover, more fair distribution of resources, acknowledging time-lag in tree planting as carbon sinks, and working with farmers to create local supply chains.

Natural Environment and Green Infrastructure Conclusions

Natural environment and green Infrastructure was the most engaged with policy. 52 respondents engaged with this area, 39 somewhat or strongly agreed with the presented ideas and only 7 somewhat or strongly disagreed.

Some **key takeaways** regarding the Natural Environment and Green Infrastructure policy:

1. People are mainly happy with how the policy stands, however there were a few suggestions for improvements.
2. A key area appears to be to **acknowledge biodiversity more**, and recognise ecosystems as a whole. Some feel there is little on LCR **blue infrastructure** (e.g. sea, rivers, wetlands etc) as it stands, and that more recognition could be given to assets outside of trees and green spaces including hedges, wetlands, wildflower areas, and wildlife itself.
3. Another area that could be looked into is explaining further, exploring more, or addressing concerns and confusions people may have around the use of '**Natural Capital**'. There were some comments that suggested more clarity may be needed on this area.
4. Lastly, not unexpected there were comments around addressing some of the ongoing green space tensions taking place in the region, and potential reversing decisions already made (e.g. Primrose Valley) and strengthen green space protections.

Policies: Energy and Resources



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Energy and Resources Policy Ideas

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

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

We are also considering how to address energy and resource (including water) efficiency of new homes as part of our suggested Housing Standards policy approach.

Energy and Resources

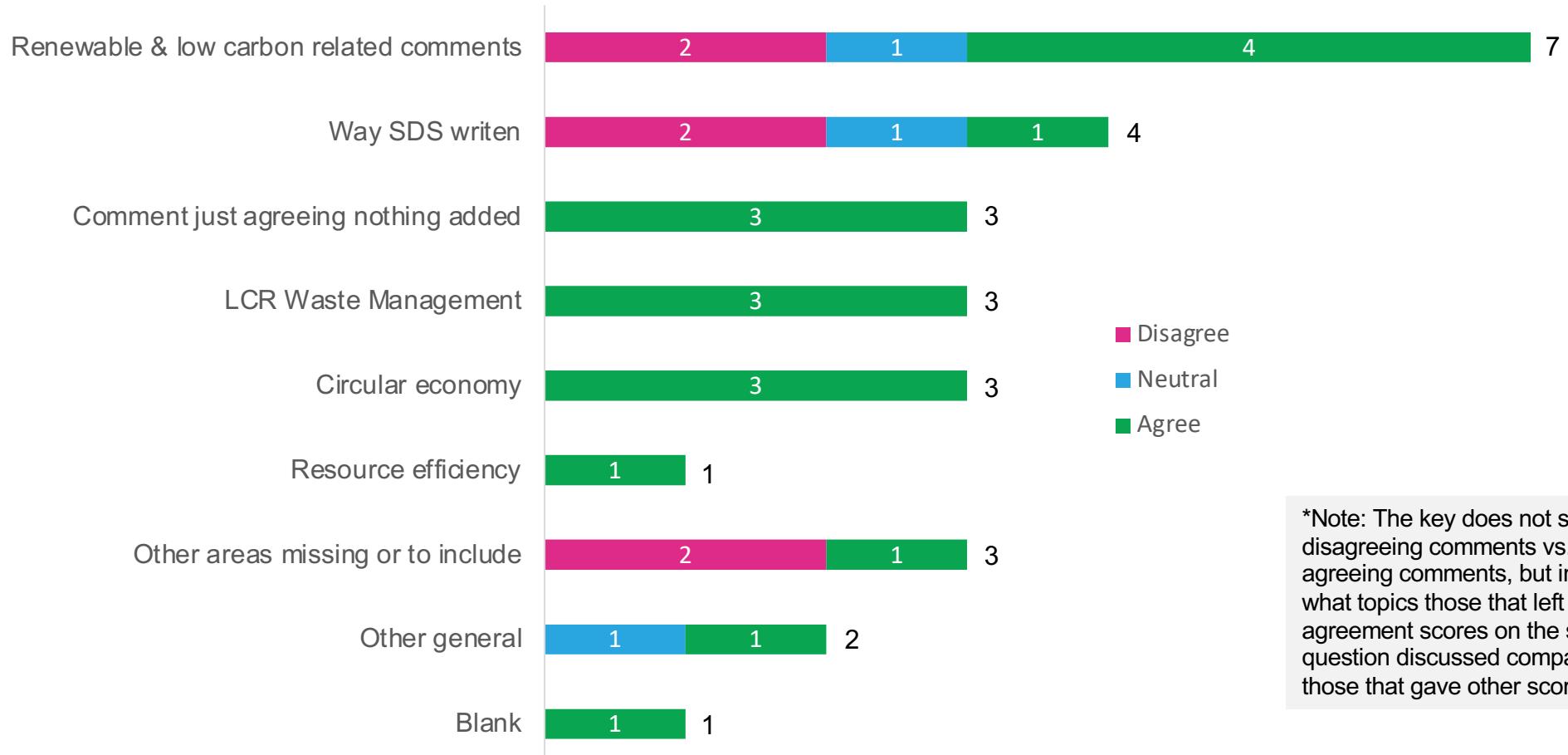
20 respondents engaged with the SDS policy regarding Energy and Resources. Overall the average agreement score was 69 out of 100 (Somewhat Agree).

Agreement with the policy



Continued: Energy and Resources

Why do you agree or disagree with this policy approach? – Broad Comment Topics Discussed



*Note: The key does not show disagreeing comments vs. agreeing comments, but instead what topics those that left lower agreement scores on the sliding question discussed compared to those that gave other scores.

Continued: Energy and Resources

Only 20 respondents engaged with the Energy and Resources policy which is why the results have been shown based on whole number instead of percentage.

7 of the comments related to the area of **renewable energy and low carbon**. Some were more negative suggesting that the some of the approaches suggested need more thinking and assessment of their impacts, for example they mentioned carbon capture being a young unproven technology, and biomass, hydrogen, and off shore wind generation having some adverse impacts on the environment. It was felt that energy proposals need to link into the wider environment especially biodiversity.

There were also comments within the broad category of renewable energy and low carbon that related to planning and development of buildings. It was highlighted that buildings need to be fit for the future and reduce carbon emissions. Furthermore, measures should be brought in to improve the environmental performance of new homes and neighbourhoods, and that the SDS should set out 'in-principle' planning support for on-site solar, hydrogen development and district heating networks across the LCR. However, advice was also given against introducing targets for energy efficiency that attempts to push developers faster than statutory programmes, as it was highlighted that there is a short fall of a qualified workforce to implement the statutory requirements let alone other requirements. This therefore may be way some suggest instead of specifying specific requirements for percentile renewable energy from development, make the task instead to demonstrate material reduction in net carbon demand.

Whatever is decided upon, it was highlighted that work will be needed to take place with energy stakeholders to secure infrastructure investment.

Continued: Energy and Resources

Of the remain comments relating to renewable and low carbon, there was a request to be engaged in the creation of an Energy Strategy, to ‘front-load’ through maximising proven and available energy infrastructure any carbon plans, and to encourage local and regional approaches to the deployment of low/zero carbon transport infrastructure including EV charging and hydrogen.

As seen in other areas of the SDS analysis, there were also some comments within Energy and Resources that related to the **way the SDS is written or should be written** (4 comments). One negative comment asked what the benefit was of the suggested as they felt it just sounded nice instead of being able to make a real difference. Possibly more clarity or reference to delivery may help to address comments such as this. Clarity and reference to delivery was mentioned by 2 other respondents. Furthermore, it was highlighted that the policy framework should be consistent with other legislation and not duplicate other regulations already in place (particularly the Building Regulations).

In relation to **LCR Waste Management** (3 comments) all the comments were mainly agreeing with the policy idea suggested and thought that it was a good idea.

However, in relation to the **circular economy** (3 comments) the consensus was that it needed to mention circular economy more, and there were feelings that the current proposals do not go far enough regarding this area.

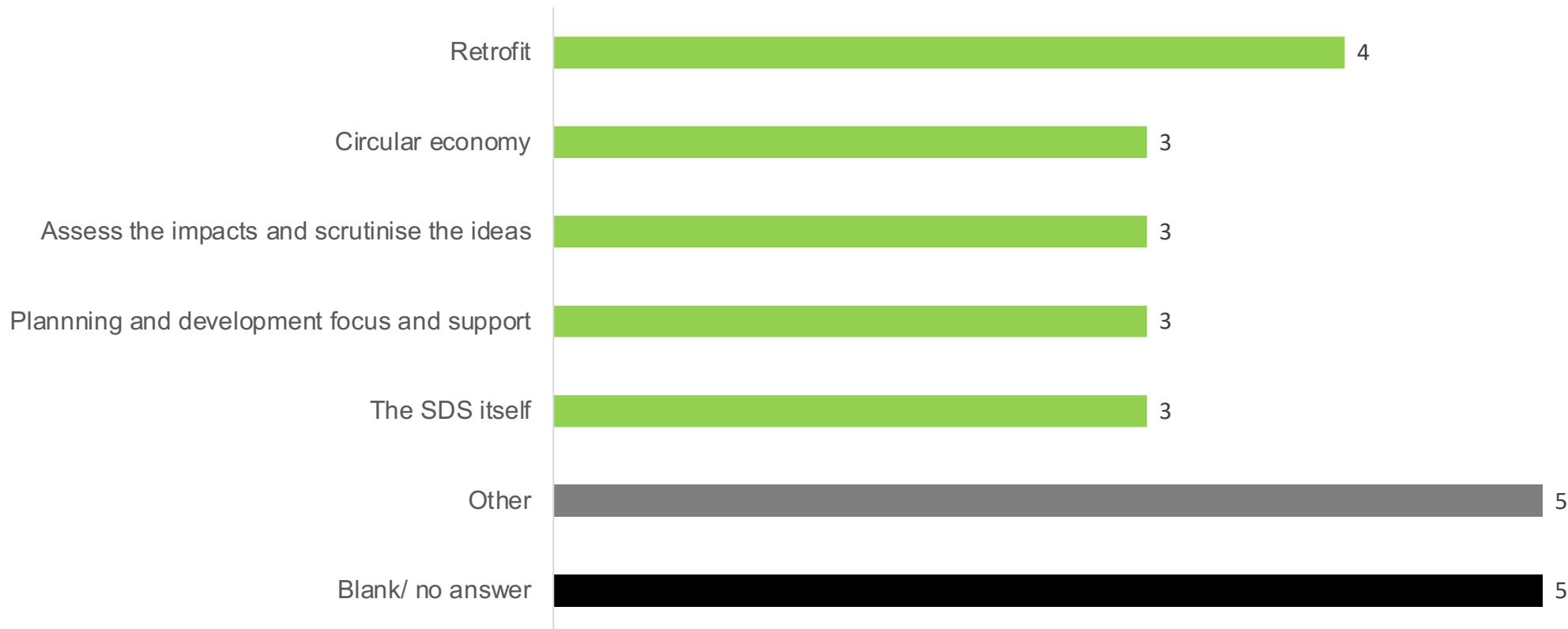
Another area that was highlighted as a potential issue was **resource efficiency**, which one respondent felt would be difficult to enforce.

Continued: Energy and Resources

As for the other areas covered that fell into the ‘other’ category, there was a suggestion to make electricity cheaper to attract business to the area, include something on providing employment to people, and to be more bold (less modest) in relation to the climate emergency and make sure it is driven by climate commitments.

Continued: Energy and Resources

Areas of improvement to the policy covered the following broad themes.



Continued: Energy and Resources

4 people left comments regarding **retrofitting**, when asked specifically about what more the Energy and Resources policy should cover. They felt that there needed to be something specifically mentioned in relation to retrofitting as it can help to reduce carbon outputs. The suggestion being that existing buildings, not just homes but also public, community, commercial and industrial buildings should be considered with priority for older builders over newer.

Another area discussed for inclusion related to the **circular economy** (3 comments). Although already in essence included within ideas about recycling etc., it was felt it could be more aligned and elaborated. There was mention about making it easier for businesses and residents to prevent waste, reuse, share, repair and recycle, reduce primary use, and to build into the planning stage a requirement to show how material used in construction and design of buildings can be used beyond first use. Furthermore, there was suggestion to look into influencing resource efficiency in manufacturing and production through the use of grants, incentives, and investment, and to consider using intelligence and research to understand how people interact with materials and the economic benefits of rethinking resources.

Once more, some comments fell into a broad topic of the '**SDS itself**' (3 comments). These related to calls for less multi-faceted objectives, more public facing communication, and more immediate action built into the policies (for example, one suggestion was to have emissions reduction targets of 10% per year).

In relation to the consideration about how the SDS is written. 3 comments highlighted the potential need to **scrutinise** some of the ideas already presented. Concern has been raised that some of the options could adversely course negative impacts under the guise of being or doing good. It was highlighted that there are in fact three types of hydrogen 'grey', 'blue', and 'green' and that not all are suitable alternatives. Furthermore, it was felt that consideration should be given to wider impacts such as global social injustice. The example given was that, according to the respondent, indigenous North American communities and their

Continued: Energy and Resources

ecosystems are being impacted by forest destruction with the product being shipped to a power station in the UK through the Port of Liverpool. The consensus around these comments is a need to scrutinise options and ideas instead of accepting claims, and to consider potential repercussions of decisions made.

Planning and development was another broad topic area of focus mentioned in regard to what more the Energy and Resources policy should cover. Respondents felt that the policy should ensure that new builds are carbon neutral, and that there should be a separate policy considering how to address energy and resource (including water) efficiency of new homes as climate change may bring additional stress to water resources. Furthermore, again it was highlighted that there should be stronger ‘in-principle’ support for on-site solar, hydrogen development and district heat networks across the LCR.

Due to the small response rate grouping comments was tricky and therefore a number fell into the category of ‘other’. These covered topics such as considering including something on doughnut economy, rethinking the cruise terminal due to air quality implications, mentioning waste water management in this area, attracting new industry to the area, improving energy efficiency standards for new production of goods and buildings, electric car clubs, comprehensive charging infrastructure, and better, cheaper public transport based on electric. One respondent also felt that greater focus should be on proactively supporting renewable energy development through, for example, creating a policy to require rooftop solar panels on large industrial and commercial buildings and identifying low landscape value areas as suitable for commercial scale solar farms.

Energy and Resources Conclusions

Only 20 respondents engaged with the Energy and Resources policy. However, of those 15 agreed (somewhat or strongly) with the ideas presented.

Some **key takeaways** regarding the Energy and Resource policy:

1. Some felt that the **Circular Economy** could be elaborated further and included more within the SDS. Additionally, some felt that **retrofitting** should be mentioned in this policy area.
2. There was also discussion around **making the building process and buildings in general more eco friendly and supporting the housing and development industry to implement changes**.
3. Despite high agreement in general, there were some concerns about what is currently included. Some highlight a need to scrutinise decisions more and really think through and question if the solutions are truly better for the environment and society, and what potential adverse impacts could happen. They **caution** just accepting claims.

Policies: Health



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Policies: Air Quality



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Air Quality Policy Idea

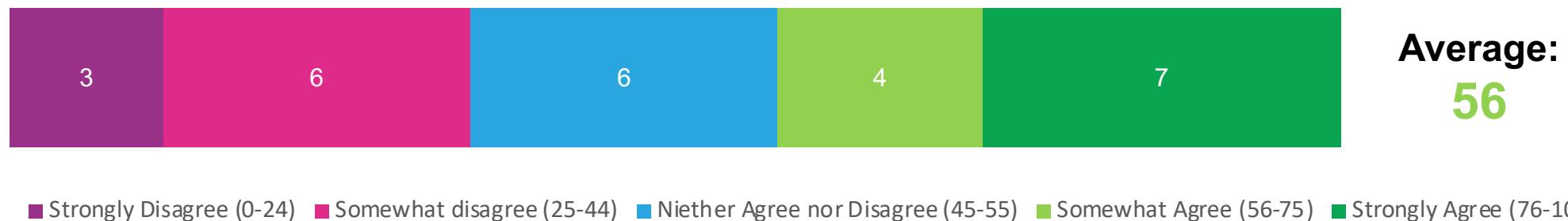
A policy that would:

- Set out what locations and types and sizes of development would be required to undertake an Air Quality Impact Assessment. Where the evidence indicates it is necessary, it would be required that the development delivers appropriate mitigation measures to monitor and address air pollution through design and throughout construction.

Air Quality

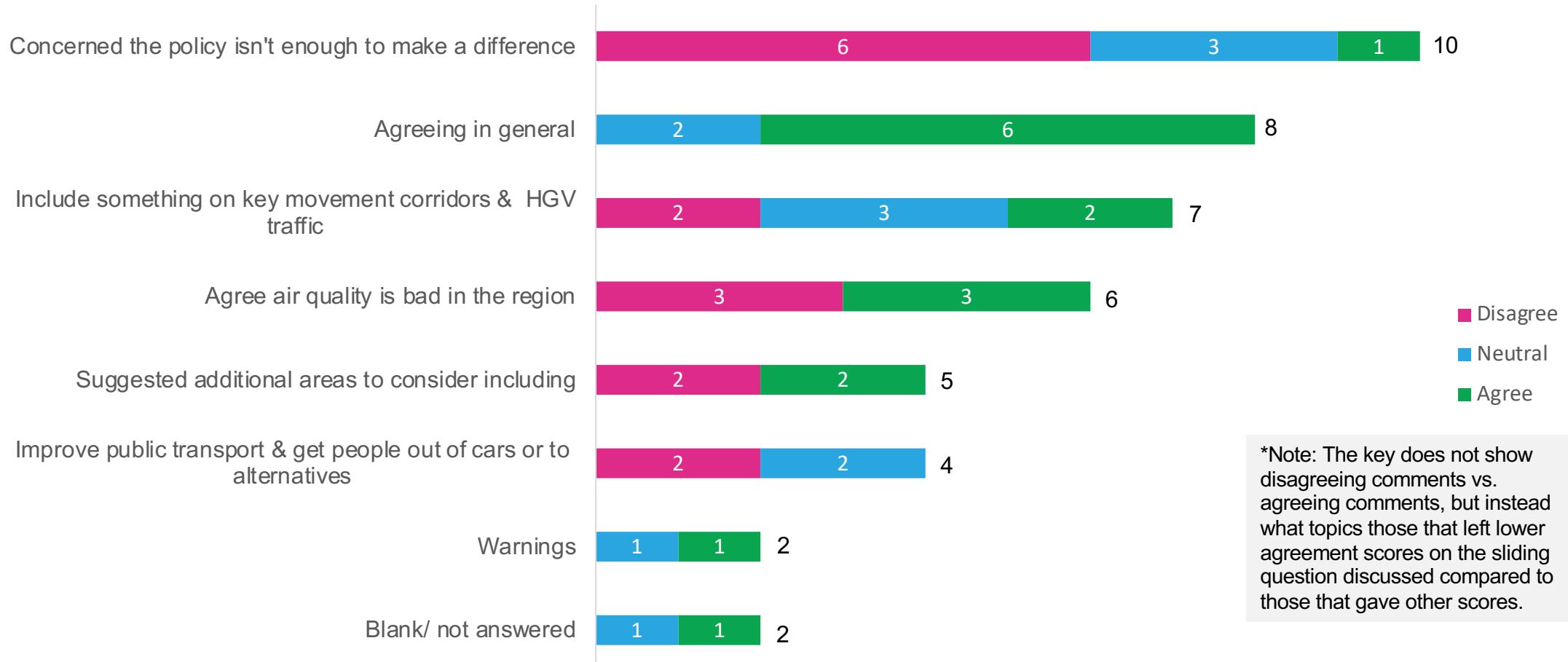
26 respondents engaged with the SDS policy regarding Air Quality. Overall the average agreement score was 56 out of 100 (Somewhat Agree).

Agreement with the policy



Continued: Air Quality

Why do you agree or disagree with this policy approach? – Broad Comment Topics Discussed



Continued: Air Quality

Only 26 respondents engaged with the Air Quality policy which is why the results have been shown based on whole number instead of percentage.

The policy got a mix of responses which explains the lower agreement score with this policy. Whilst, 8 respondents **broadly agreed** with the presented idea and 6 specifically mentioned in their comments that they agree the **LCR has an issue with air quality**, 10 respondents' comments related to the policy **not being enough as it stands to make a real difference**.

There were comments suggesting they felt the policy feels weak and doesn't really say anything, with mitigation not being enough for some. There were also concerns about the application of it, and suggestions that it should contain more short and medium term interventions.

There were aspects that people felt could have been included or considered more. For example, including something on **key movement corridors and HGV traffic** in regards to their locations and looking for non-road alternatives (7 comments). Along a similar theme, there were also comments around including something on **general transportation** (4 comments) in relation to improving public transport, shaping the environment for walking and cycling, and discouraging car use or encouraging alternatives (e.g. electric).

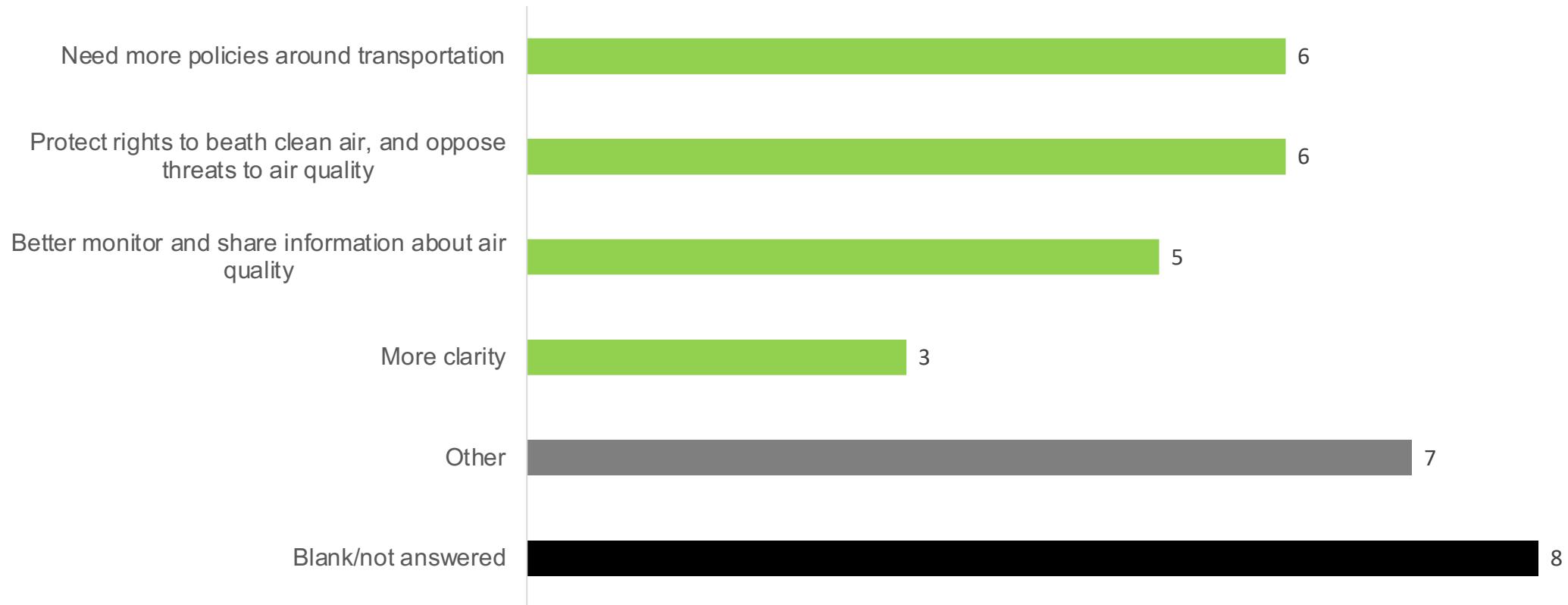
Some other areas mentioned that people felt could be considered within Air Quality were, considering a policy on the location of warehouses and industrial units in regards to their environmental impact, monitoring air quality after construction is finished, and holistically considering the adjoining community in Air Quality Assessments, for example if there is a playing field next to a site consideration should be given to the fact that when exercising your breathing is heavier and you may breath in more particles.

Continued: Air Quality

Lastly, for the two commenters that gave words of warning they were cautioning placing unreasonable burdens on developers or unduly causing duplications.

Continued: Air Quality

Areas of improvement to the policy covered the following broad themes.



Continued: Air Quality

When asked specifically about what more the Energy and Resources policy should cover comments fall into a few broad topics. 6 comments related to feeling the Air Quality policy needed **more on transportation**. For example, creating a policy requiring all developments to incorporate electric charging points, or having proper measures to reduce car use, such as restricting parking, making driving difficult or expensive (e.g. congestion charges), and identifying alternatives to new road proposals. Furthermore, there were some specifics suggestions around HGV use, including, proposing and fostering alternatives for transport of heavy goods, or banning HGVs from roads that exceed atmospheric conditions until the rates drop back down.

Another area that some respondents raised was that of including a policy on **protecting rights to clean air and opposing threats to air quality** (6 comments). A number of commenters were raised around the ongoing Rimrose Valley plans. Respondents felt that the SDS should outline that health be held over economic benefit and that the green belt should be protected from development.

Better monitoring and sharing information about air quality was also highlighted (5 comments). Some felt that there needed to be more comprehensive air quality monitoring systems across the City Region with real time input, whilst some others felt consideration should be given for ways in which people who monitor air quality could feed into combined datasets. Furthermore, this area touched on accessing and the sharing the information with a suggestion that developers, councils and landlords should provide long baseline air quality datasets to owners and tenants, and that locations of air pollution should be identified and that information shared.

There were a few comments (3 comments) that related to wanting **clarity** on some aspects. For stakeholders the clarity they seek is on what will be expected from air quality assessment applicants (e.g. types projects they will be needed to be done on and mitigations). One commenter wanted clarity on where air quality fits into the reindustrialisation of Liverpool.

Continued: Air Quality

Lastly, a number of topics fell into the broad category of ‘Other’. These comments covered, planting more green spaces, pushing green energy solutions for transport and manufacturing, supporting community air-quality projects, addressing air quality from shipping, freight and cruise liners, prioritising areas identified in the LCRCA & Economic Assessment study authored by Kings College London, referencing LJMU Green Travel Corridors project, in general having greater emphasis on practical measures over tick boxing, and including a policy to locate sensitive uses away from polluted roads e.g. schools.

Air Quality Conclusions

Only 26 respondents engaged with the Air Quality policy, with 13 of those agreeing to some degree (somewhat or strongly) with the ideas presented.

Some **key takeaways** regarding the Air Quality policy:

1. It was **not felt that the policy was another to tackle the issue** and that further policy and **areas need to be discussed and included**, for example transportation in general and particularly HGV use.
2. There also appears to be some **potential clash between what the public may want and what would work for developers**. The public want to put health above economics and make mitigations difficult, whereas the developers appear to be for mitigation being included.
3. Improved measurements and sharing of available data was also highlighted as a potential area to consider.

Policies: Active Travel



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Active Travel Policy Ideas

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

Active Travel

22 respondents engaged with the SDS policy regarding Active Travel. Overall the average agreement score was 67 out of 100 (somewhat agree).

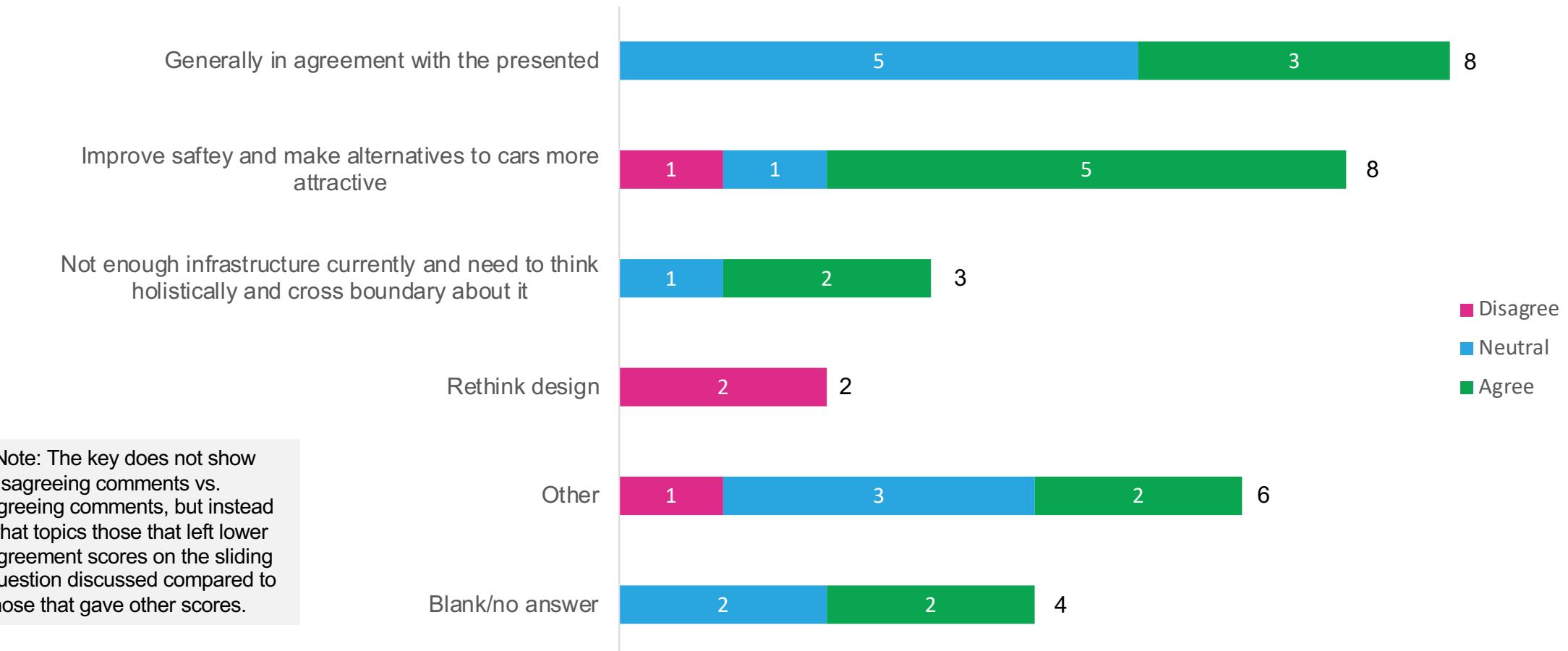
Agreement with the policy



■ Strongly Disagree (0-24) ■ Somewhat disagree (25-44) ■ Neither Agree nor Disagree (45-55) ■ Somewhat Agree (56-75) ■ Strongly Agree (76-100)

Continued: Active Travel

Why do you agree or disagree with this policy approach? – Broad Comment Topics Discussed



Continued: Active Travel

Only 22 respondents engaged with the Active Travel policy which is why the results have been shown based on whole number instead of percentage.

In general those engaged seemed to agree with the presented ideas. Yet, one area that some felt more focus could be given to is in improving **safety** (8 comments) of cycling, the streets in general, and public transport. Alternatives to cars need to be made attractive options to the public and these comments seem to imply that currently a number of people don't feel safe enough in their environments to use active travel or public transport over their car. Reliability of public transport was also mentioned in this section.

Linking in with improving safety is also to address the **infrastructure needs** (4 comments), but considering these needs on a strategic level instead of specific sites, with cross boundary cooperation (not only internally with the LAs but also externally to our neighbours such as Cheshire West & Chester).

Furthermore, **rethinking the way things are designed** (2 comments) could help to tackle the infrastructure needs and the safety concerns. It was suggested that the design principle should be to make active travel modes quicker and more direct than driving, and to include the idea of 20 minute neighbourhoods/15 minute cities into this SDS area. Additionally, with this rethinking of design it was suggested a better name for this policy could be 'Active environments' to help thinking be more holistic.

Lastly, as with other policy areas, due to the small number of responses a number of comments fell into the category of '**other**' as they did not group into the other topic areas. Some were more negative, with one noting they thought taking up road space and causing traffic if cycle lanes are not used does not make sense, and another raised concerns about how this would work in practice and if otherwise sustainable developments could be impeded by this policy.

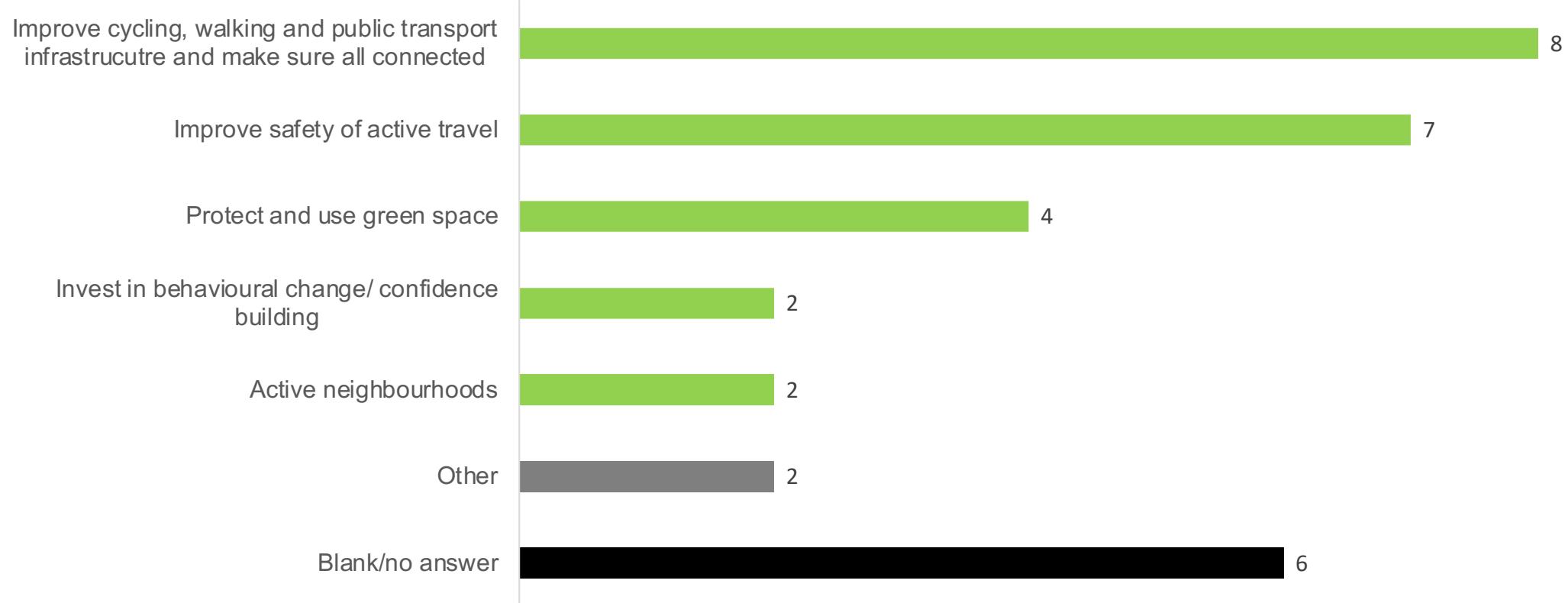
Continued: Active Travel

On the other hand, one comment highlighted how active travel is not only good for wellbeing but also the economy with people more likely to walk past and use local retail and amenities. Additionally, one comment highlighted how having a policy on active travel could help address equality issues as a number of people across the LCR do not have access to a car.

Of the remaining comments that fell into the ‘other’ category one noted that housing allocations will need to be made in areas that will benefit from public transport and where walking and cycling can be utilised, and the last comment again highlighted the need to protect green spaces.

Continued: Active Travel

Areas of improvement to the policy covered the following broad themes.



Continued: Active Travel

Regarding what more the Active Travel policy could cover, most comments fell into similar categories of content. 8 comments related to **improving active travel and public transport infrastructure and connectivity**. Respondents felt that improvements should be made to encourage people to active travel and public transport. Connectivity should be improved making it easier to go anywhere including not only cross boundary between our LAs but also with neighbouring areas such as Cheshire West and Chester.

Linking in with encouraging people to use active travel methods and public transport, is to include something on improving **safety** particularly of active travel (7 comments). Comments noted reducing traffic levels or routing cycling and walking routes away from high traffic areas, widening pavements, providing safe bike storage including for those who may not have storage at home, and also keeping in mind the different types of active travel users (particularly mention to accessible bikes).

Combined with the above there was also mention of considering looking into **behavioural change and building confidence** (2 comments) to help support people to switch from car use. This could also be aided by embedding the design principles and ideas of **active neighbourhoods/ 20 minute neighbourhoods/ 15 minute cities** into the SDS (2 comments).

4 comments, highlighted the need to **protect green spaces** for the purpose of encouraging active travel. One suggested even converting formal or low quality green space to more naturalistic vegetation to make the spaces more attractive for walking and use.

Only 2 comments could not be categories with one suggesting the need for more cycling shops within the LCR, and the other considering if deliveries by cargo bikes could be encouraged.

Active Travel Conclusions

Only 22 respondents engaged with the Active Travel policy, with half (11) agreeing to some degree with the policy ideas presented.

Some **key takeaways** regarding the Active Travel policy:

1. Improving the infrastructure, **connectivity and safety**, seem important to help attract people to active travel alternatives, this could be combined with behavioural change and confidence building work.
2. **Embed active travel at the heart of planning**, prioritising it over car use and design with 20minute neighbourhoods (15minute cities in mind).
3. **Consider where people want and need to go**, even connecting to neighbouring areas outside the LCR.

Policies: Health Impact Assessments



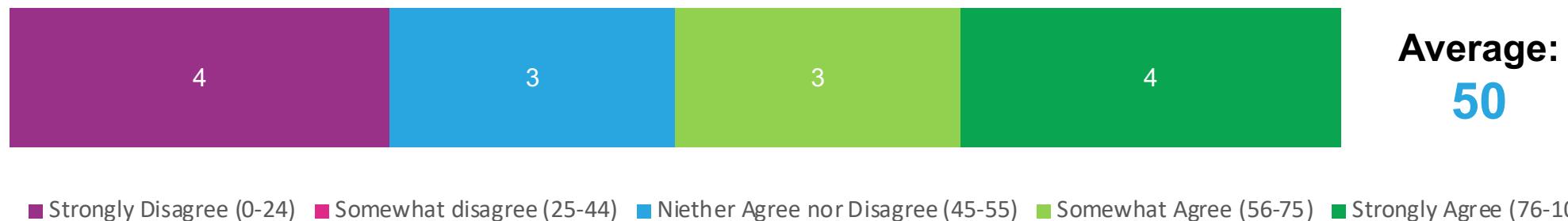
METRO MAYOR
LIVERPOOL CITY REGION

EVIDENCE, RESEARCH
& INTELLIGENCE

Health Impact Assessments

Only 14 respondents engaged with the SDS policy regarding health Impact Assessments. Overall the average agreement score was poor, averaging 50 out of 100 (Neither agree nor disagree).

Agreement with the policy



Continued: Health Impact Assessments

The suggested policy is that specified planning applications and development plans made in the City Region would need to be accompanied and informed by Health Impact Assessments.

Despite quite a bit of agreement with this policy from some people, others particularly, developer stakeholders, disagreed or had concerns. It was felt that as the Environmental Impact Assessment already includes population and health as part of it and that therefore duplication would be taking place if a Health Impact assessment was also required. It was also felt that more clarity may be needed on who would be expected to do these and what they would include.

Other concerns held by those who left comments included, a need to make sure that the policies addressing health are action based not just tick boxing, and some felt that there should be something within the policy that specifically addresses mental health. Other suggested improvements included, requiring developers to demonstrate how they will make positive impacts on resident's health and prioritise green spaces in projects.

When asked what planning applications Health Assessments could be used on a number of ideas were suggested including, hot food takeaways, food shops, fast food, developments that generate car use, pubs, shops selling tobacco, manufacturing/chemical industry, roads, housing, any that impact green spaces or wilderness, and in general large developments.

In regards to **key takeaways**, this policy area may require reconsideration.

- Whilst people appear to agree considering health is important there may already be things that cover assessing health in planning. These should be investigated to avoid any duplication.
- Additionally, whatever is decided upon in relation to this policy should be action based not tick boxing, and should keep residents and locals in mind. Potentially, something could also be included on mental health.

Policies: Healthy Food Business



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Healthy Food Businesses

Only 8 respondents engaged with the SDS policy regarding Healthy Food Businesses. Overall the average agreement score was 65 out of 100 (somewhat agree).

Agreement with the policy



Continued: Healthy Food Businesses

The suggested policy is to restrict new hot food takeaways in locations where obesity levels are high or near where children and young people congregate. Some felt that the idea was all wrong, whilst others felt it needed a bit more work, or that other actions may result in better impacts. One commenter noted that this idea could impede business and does not appear to leave room for local context, such as if there are already healthy choices available as well. Furthermore, it was pointed out that removing takeaways may not necessarily solve the issue with people turning to delivery instead.

Looking at how the policy could be improved, some suggested focusing on encouraging more healthy options not just restricting locations. Additionally, a couple felt that more education could help, reducing business rates and proactively encouraging healthier retailers, and tackling the issue of drive-throughs in which not only do people consume unhealthy food but also drive in their cars which contradicts the endeavours of environmental policies.

Additionally, when asked what else the policy could include, along with that mentioned above, there was also suggestion to address food poverty, consider something to do with the circular economy regarding food, consider also the needs to access affordable leisure, and the wider impact of the food industry and take-aways on the environment (e.g. plastics and wrappers).

In regards to **key takeaways**, this policy area may require further tweaking.

- Whilst people appear to agree that there are quite a lot of unhealthy food-outlets and obesity is an issue, they suggest further consideration of whether this policy will have the intended outcomes proposed.
- Additionally, there appears to be other areas that may be better addressed with dealing with the issues. For example tackling drive-throughs, addressing food poverty, or positively encouraging healthier retailers for example with reduced business rates.

Policies: Social Infrastructure



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Social Infrastructure

Only 11 respondents engaged with the SDS policy regarding Social Infrastructure. Overall the average agreement score was 65 out of 100 (somewhat agree).

Agreement with the policy



■ Strongly Disagree (0-24) ■ Somewhat disagree (25-44) ■ Niether Agree nor Disagree (45-55) ■ Somewhat Agree (56-75) ■ Strongly Agree (76-100)

Continued: Social Infrastructure

The suggested policy is that existing strategic social infrastructure should be identified and protected, and support should be given to the growth of strategic social infrastructure in locations that are highly accessible by walking, cycling, public transport and to all of the community.

Overall agreement is quite high with 8 of the 11 agreeing to some degree with the proposed. However, there are areas of improvement noted in the comments. Firstly, a couple of things were highlighted as needing defining, including, 'strategic and social infrastructure' and 'highly accessible'. Furthermore it was noted that the policy needs to include the criteria by which it would determine protection. Some developers felt there should not be a blanket protection but instead protection should be determined by need and demand.

It was felt that the policy should also include, recognition and support of the voluntary sector, be expanded to require all infrastructure to be accessible and available, incorporate the agent for change principle, encourage retrofitting social infrastructure to make it more eco friendly, and expand it to also address any gaps in provision. A couple of comments suggested looking to underpin the policy with Active Design Guidance and the National Design Guide, and to consider the mechanisms already in place with Section 106 Agreements. Additionally, it was suggested that any monitoring and identifying be based on quantity, quality, accessibility and availability.

A word of caution was given in one comment to make sure any policy aligns with changes the government make following the White Paper. Trying to do too much may be unfeasible for developers.

In regards to **key takeaways**, people appear fairly happy with this policy, although more work may be needed to define and clarify exactly what it will cover and how it will be applied.

Policies: Inclusive Economy



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Policies: Employment & Skills



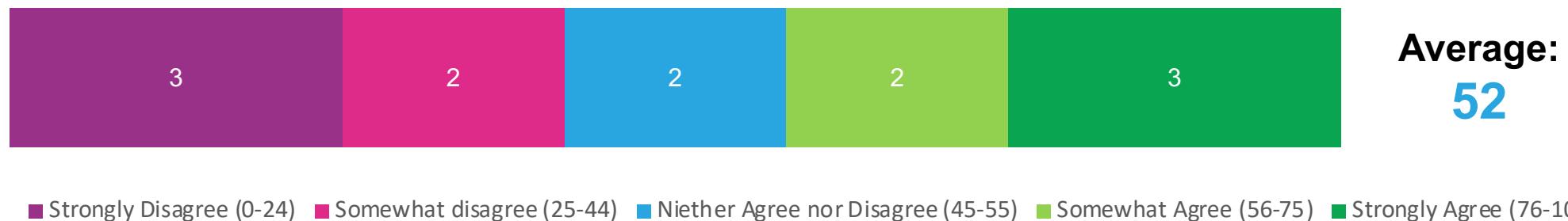
METRO MAYOR
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EVIDENCE, RESEARCH
& INTELLIGENCE

Employment & Skills

Only 12 respondents engaged with the SDS policy regarding Employment and Skills. Overall the average agreement score was quite low at 52 out of 100 (neither agree nor disagree).

Agreement with the policy



Continued: Employment & Skills

The suggested policy is that major development proposals would be required to support a proportion of apprenticeships in construction, with a preference towards apprenticeships for City Region residents to secure sustainable employment.

There were a number of concerns around this policy area. A couple of comments flagged that neighbouring authority applicants should not be excluded from securing sustainable employment. Some questioned the ‘sustainable’ nature of the employment and felt that the policy should include helping to deliver the green economy and green jobs which they suggest are more sustainable. Additionally, some felt the policy was not right or suitable enough to address employment and skills issues within the city region. Although some of the suggested may not be in the remit of the SDS, one area highlighted was that other employment should be considered. However, a policy on encouraging manufacturing to the area could support this, an example given was to offer land close to the water front.

Another concern raised came from developers in regards to the practicality of being able to meet this policy. They argued that apprenticeships in this area tend to be 36 months long and therefore there needs to be enough work, and in suitable locations, for apprentices to complete their training. If they have to move to a location on the other side of the LCR in the middle of their apprenticeship, this may lead to people dropping out. Additionally, there is a need to understand what skills the industry needs and if the content of courses is suitable. Furthermore, ‘major development’ would need defining as SME builders who rely on sub-contracts may not be able to meet this policy. A suggested option instead would be to adopt a strategic infrastructure levy with the money being used to support apprenticeships in construction.

In regards to **key takeaways**, people appear to have mixed feelings regarding this policy. Maybe it could be strengthen to include something on ‘green jobs’, but also further consideration could be given to the practicalities, and elaborated on as the policy continues to take shape.

Policies: Digital Connectivity



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& INTELLIGENCE

Digital Connectivity

Only 11 respondents engaged with the SDS policy regarding Digital Connectivity. Overall the average agreement score was 60 out of 100 (somewhat agree).

Agreement with the policy



Continued: Digital Connectivity

The suggested policy is that there should be a gigabit connection requirement for specified thresholds, and types of residential and non-residential planning applications, set prior to residents or businesses moving in. Where certain connections are demonstrated not viable or site feasibility is an overriding issue, the requirement would be for the next fastest broadband speed to be secured.

The majority of respondents who engaged with this area were in agreement with the proposed. However, there were some concerns about the achievability of the proposed. Further clarity may help with more information sort on the weight that should be attached to material social and economic benefits associated with 5G, and the need to clarify 'thresholds' and 'types of residential development'.

Regarding improvements to the policy ideas, some questioned the focus of the policy on new developments and suggested widening out to existing places. Others put forward aligning the policy to similar plans in neighbouring authorities. Specifically, In regards to 5G it was also suggested that the policy should include supplementary planning guidance that explains and discusses practical elements with the infrastructure.

Whilst not necessarily being things that the SDS may be able to address, some proposed looking in to policy to help address affordability of digital connectivity and people's confidence of using technology through training and skills development bringing young people and seniors together.

In regards to **key takeaways**, people appear in favour of the policy, however maybe more elaboration and explanation may help to clear up any concerns shared.

Policies: Social Economy



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LIVERPOOL CITY REGION

EVIDENCE, RESEARCH
& INTELLIGENCE

Social Economy

Only 8 respondents engaged with the SDS policy regarding Social Economy. Overall the average agreement score was 72 out of 100 (somewhat agree).

Agreement with the policy



■ Strongly Disagree (0-24) ■ Somewhat disagree (25-44) ■ Neither Agree nor Disagree (45-55) ■ Somewhat Agree (56-75) ■ Strongly Agree (76-100)

Continued: Social Economy

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

The majority who engaged with this area agreed (somewhat or strongly) with the proposed. However, it was felt that mechanisms needed to be specified for how this is to be achieved, and consideration as to whether there are already mechanisms that can be used (for example, Assets of Community Value, Village Greens, Protected Open Spaces).

Additionally, it was felt by some that the policy could go further, amending it, to protect unless better or equivalent options can be provided at the same price, and that where relocation is needed for construction somewhere should be provided in the meantime. Furthermore, additional policies around leasing could be used as a mechanism to protect, for example with the provision of long term leases to prevent price increases, and leases that restrict the changing of occupier to someone of similar use (e.g. the new tenant must be a community project).

Whilst, on the whole the few who responded agreed with the policy. A concern was raised that local council projects may impede the policy with one commenter reporting their perception that local council projects seem to be given priority. However, it was also noted that if the criteria for social value and greening spaces is embedded in the SDS this may help to support the success of social organisations' endeavours.

In regards to **key takeaways**, the few who responded appear in favour of the policy, however more detail could be provided on the mechanisms that will support the policy, and potentially it could go further to provide newer equivalent buildings/spaces in the same area, at the same price, and to help with relocation during construction if required.

Policies: Rural Economy

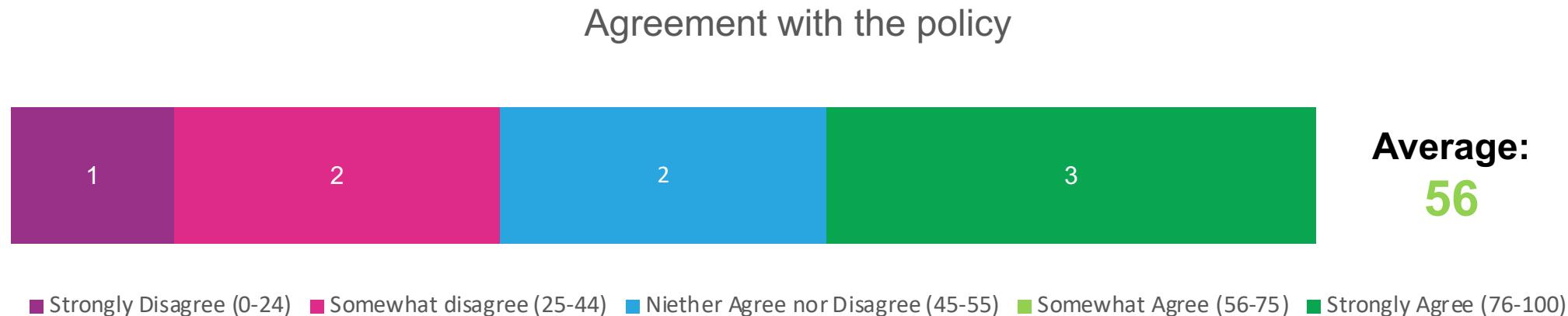


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& INTELLIGENCE

Rural Economy

Only 8 respondents engaged with the SDS policy regarding Rural Economy. Overall the average agreement score was 56 out of 100 (somewhat agree).



Continued: Rural Economy

The suggested policy is to enhance food security and reduce food miles by protecting the best and most versatile agricultural land in the City Region.

Few people engaged with this section of the consultation, and there was a mix in regards to response. Whilst, most agreed that food security is important particularly with implications of Brexit and Climate Change, many felt the policy could be improved. One respondent felt, as it stands the policy is 'lacklustre' and 'uninspiring', and it is unclear how it will be enacted.

One suggestion for improvement in regards to this policy is to recognise flooding and consider policies that address this. Another suggested banning building on agricultural land (although the policy would need to be flexible to allow farmers to adapt to new market demands). Additionally, there was a suggestion to imbed a broader system of monitoring into the policy, one that looks at food availability, quantity of locally grown food, rural/agricultural job numbers, and land not in use. More widely, a suggestion was to expand the policy to truly be about 'rural economy' by including strategies around sports and leisure facilities and supporting other rural business (e.g. equipment maintenance).

Consideration may also be needed in relations to the definition of 'versatile land' a commenter highlighted that best and most versatile land grades are 1,2, and 3a but that most land is not subgrade so potential all grade 3 should be included.

In regards to **key takeaways**, the few who responded appear to agree something needs to be done, but not necessarily that the presented is the best solution with suggestions for improvement and expansion of the policy put forward.

Policies: Placemaking



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Policies: Design Quality



LIVERPOOL
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COMBINED AUTHORITY

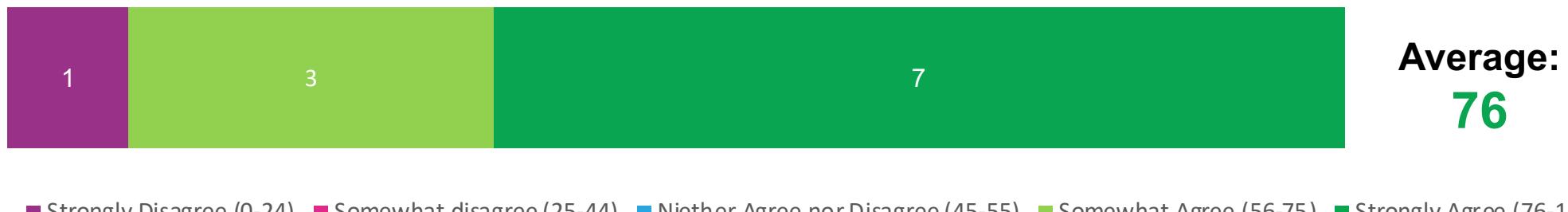
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EVIDENCE, RESEARCH
& INTELLIGENCE

Design Quality

Only 11 respondents engaged with the SDS questions regarding Design Quality. A proposal as such was not laid out, instead people were asked questions regarding which design tools would be most appropriate for securing good design. Despite a policy not being laid out, an agreement scale was still presented. On average the score was 76 out of 100 (strongly agree). In this instance this score may be taken as agreement that Design Quality should be included but not necessarily agreement with a policy as none was put forward at this time.

Agreement

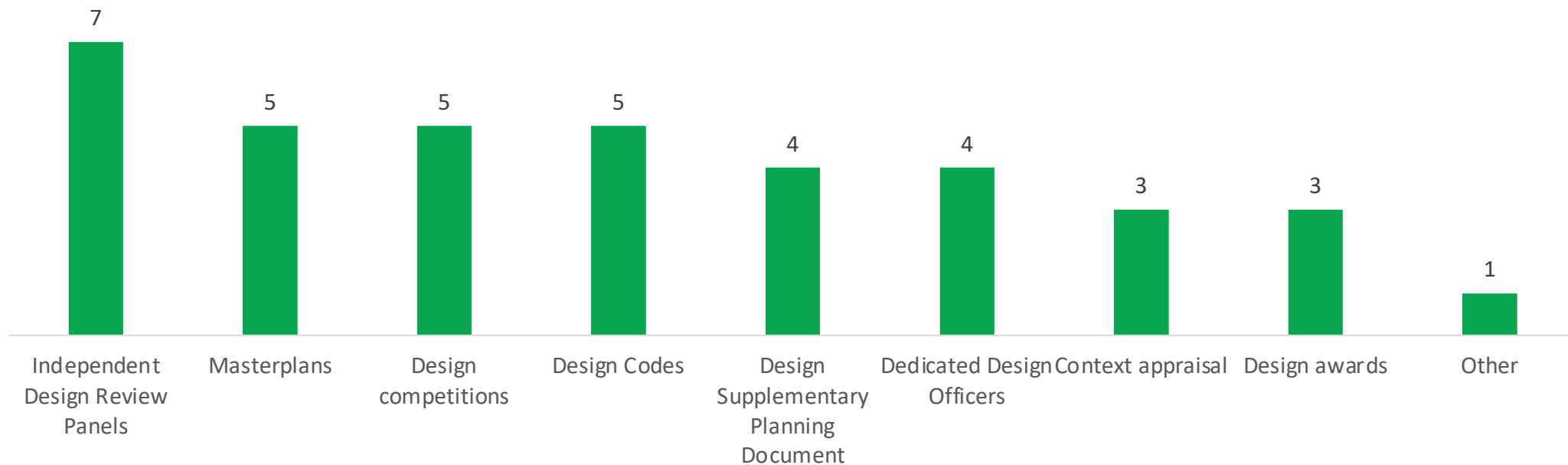


■ Strongly Disagree (0-24) ■ Somewhat disagree (25-44) ■ Neither Agree nor Disagree (45-55) ■ Somewhat Agree (56-75) ■ Strongly Agree (76-100)

Continued: Design Quality

The table below shows the results of which design tools respondents felt could be used to help achieve good design. The most select option was independent design review panels. The respondent that chose 'other' noted that community input and feedback on designs could also be a useful tool.

Which design tools do you think could be used to help achieve good design?



Continued: Design Quality

In addition to the coded question of which design tools respondents thought could be useful. A question was asked as to what else the policy could include. A couple discussed incorporating environmental sustainability and Active Design into the tool kit. Another felt that architecture as a simple index of good design should be included.

Whilst, the previous slide shows support for including independent design review panels, one commenter cautioned these as they may not reflect the tastes and preference of the public. They felt that the people of the City Region (members of the public not just design consultants or public agencies) should be involved in preparing design guidance and codes. They went on to suggest that the LCRCA could lead on this by preparing a design guide.

A comprehensive and clear guide is what some commenters felt is needed, however, there are concerns about restrictions on development from some. One stakeholder instead stated a preference for individual master plans over LCR-wide design principles, yet another commenter argued the opposite instead looking for the policy to give an integrated view to the whole of the LCR.

In regards to **key takeaways**, whilst people appear to agree something needs to be included on Design Quality, there may be more to explore here in regards to exactly what is included. Few people responded to this section of the consultation and the results show some differing opinions on what would be most useful.

Policies: Housing Standards



LIVERPOOL
CITY REGION
COMBINED AUTHORITY

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EVIDENCE, RESEARCH
& INTELLIGENCE

Housing Standards

Only 10 respondents engaged with the SDS questions regarding Housing Standards. A proposal as such was not laid out instead people were asked to consider which recognised housing standards could be included as a housing standard requirement in the SDS. Despite no proposal being laid out, an agreement scale was still presented. On average the score was 72 out of 100 (somewhat agree). In this instance this score may be taken as agreement that housing standards should be included but not necessarily agreement with a policy as none was put forward at this time.

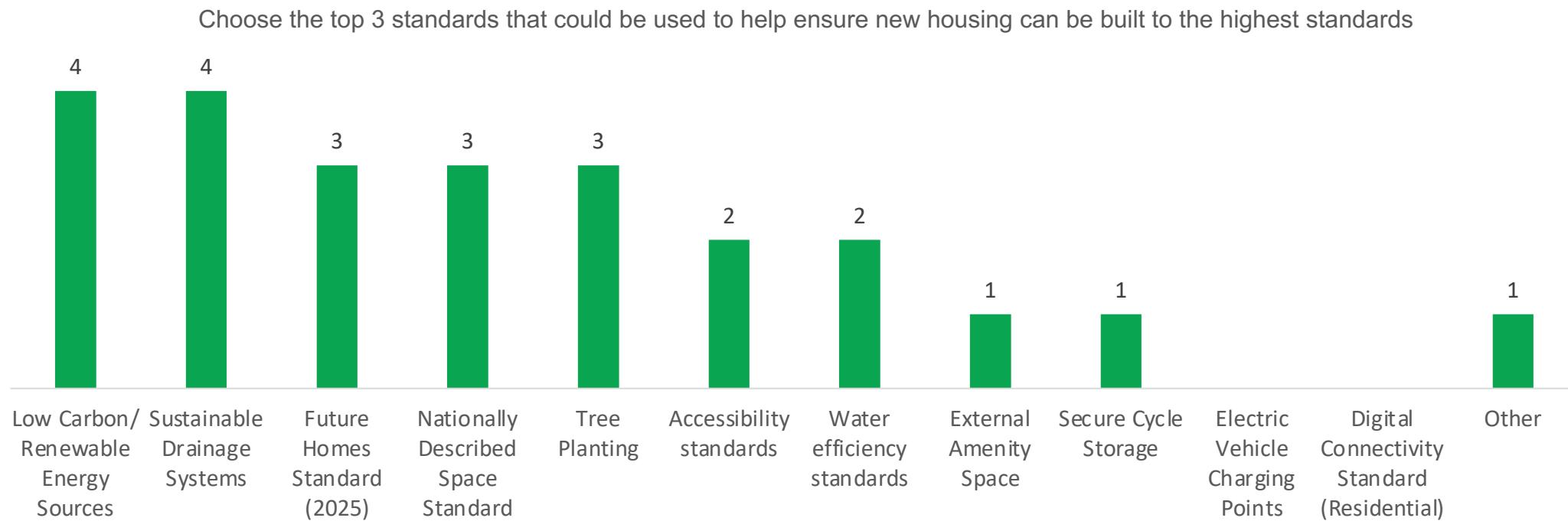
Agreement



■ Strongly Disagree (0-24) ■ Somewhat disagree (25-44) ■ Neither Agree nor Disagree (45-55) ■ Somewhat Agree (56-75) ■ Strongly Agree (76-100)

Continued: Housing Standards

The table below shows the results of which housing standards respondents felt could be used to help ensure new housing can be built to the highest standards. Low Carbon/Renewable Energy Sources and Sustainable Drainage Systems were the most selected. Interestingly Electric Vehicle Charging Points and a Digital Connectivity Standard were not in any respondents top 3. The ‘other’ option suggested was that of Active Design.



Continued: Housing Standards

In addition to the coded question of which housing standards respondents felt could be used to help ensure new housing can be built to the highest standards, respondents were also asked if there are any other ways the SDS could ensure that new housing is built to the highest standards. One individual suggested applying NDSS to ‘co-living’ developments to close any loop on potentially lower quality. Another felt that design codes in general should be rigorously applied.

Another question was asked, regarding what else they would like to see covered by the SDS regarding housing standards. A few people asked why the policy was being restricted to ‘new’ housing and what strategy if any the SDS would include on existing housing stock. A couple also mentioned tree planting, with a stakeholder suggesting the SDS allow for tree planting off site, however another commenter felt that the idea of greenery should move beyond just trees to include other habitats that enhance places and encourage biodiversity. Additionally, one commenter felt that the policy should include life cycle analysis of raw materials. More generally though, another asked why the approach focuses on individual dwellings instead suggesting a more holistic approach including active design.

As has been seen in some other policy areas. Key stakeholders also suggested caution should be taken that the proposed does not go further than national standards as it could make projects unviable. They caution that any proposals consider what the government is set to propose and that consideration be given to cost implications for developers.

Lastly a final suggestion made was to build in allowing for regular updates as technology changes and improves.

In regards to **key takeaways**, whilst people appear to agree something needs to be included on Housing Standards, there may be more to explore here in regards to exactly what is included.

Policies: Other



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Policies: Other Policy Suggestions



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Other Policy Suggestions

Respondents were asked if there were any other policy approaches / areas they thought should be covered by the SDS. Due to the nature of responses, which include evidence to support the suggested, it is recommended that these comments be read to explore further (see appendix).

As a summary they cover topics such as including more reference to the heritage of the city region, , including a policy on supplying family homes which not only are sort by the market but could attract workers to the area, including a policy on student housing and affordability much like that in London (H15) which was created with the support of NUS, and creating a more developed and sustainable city by insisting on SDG8,9,12&17

Additionally, some felt there was a need to address the Port of Liverpool in the SDS, and the strategic approach to employment land provision.

Although there was understanding that this round of consultation was not to include housing numbers there was also a suggestion to be clear on housing supply and distribution, and clarity on if the SDS will be including anything on the approach to infrastructure or if that will be covered elsewhere.

In regards to **key takeaways**, there may be some areas worth considering for inclusion in the SDS however due to the nature of comments it is hard to summarise and recreate them here, consulting the appendix should allow for greater understanding and exploration of options.

Policies: Integrated Impact Assessment



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EVIDENCE, RESEARCH
& INTELLIGENCE

Integrated Impact Assessment

Only 6 respondents engaged with the SDS consultation section regarding Integrated Impact Assessments. On average they agreed the Scoping Report identifies the key issues for the LCR. However, one individual mentioned that more focus is needed on developing a circular economy rather than economic growth, and another questioned if biodiversity is incorporate in the sustainability assessment. One minor note requested a footnote link to Sport's England's Planning for sports guidance be included in paragraph 4.2.6

Agreement

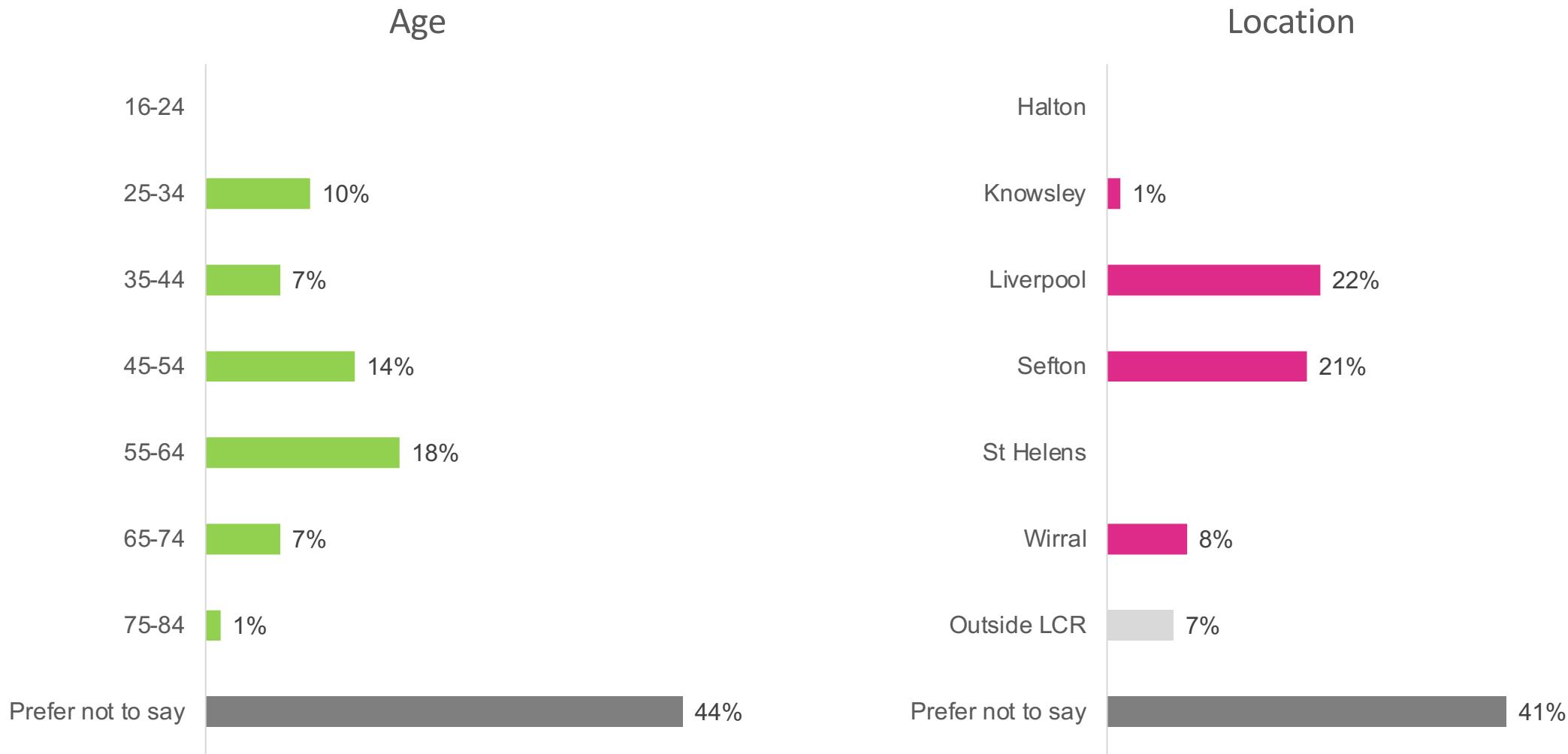


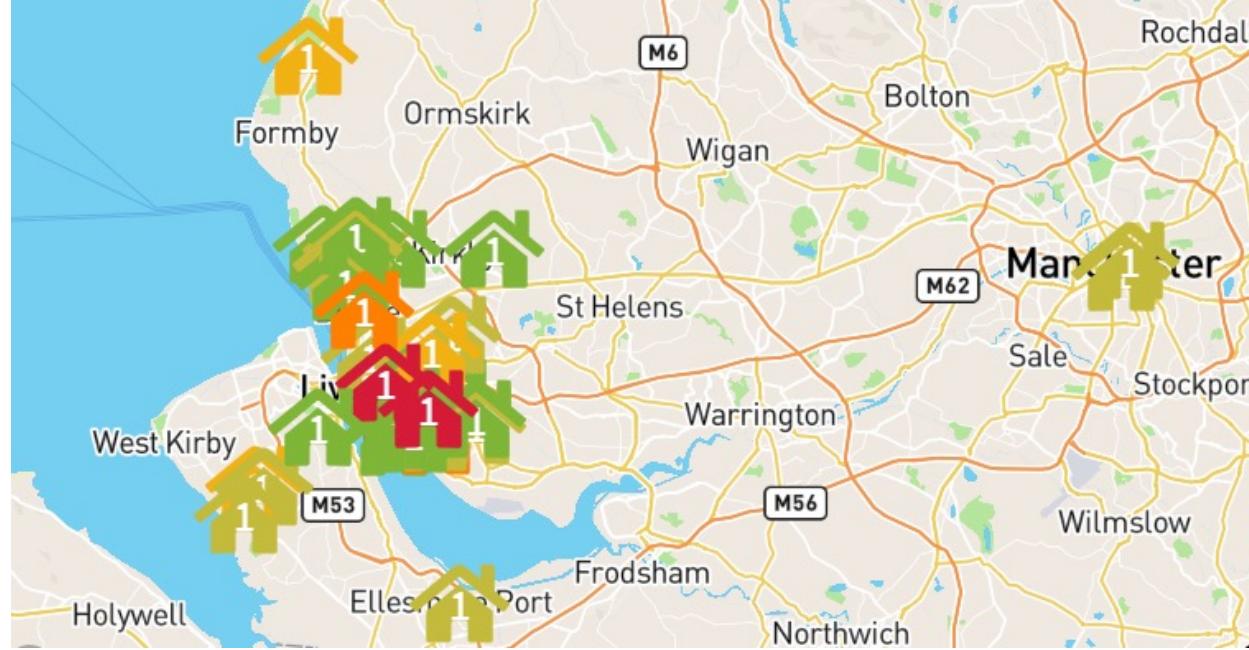
Appendix: Sample



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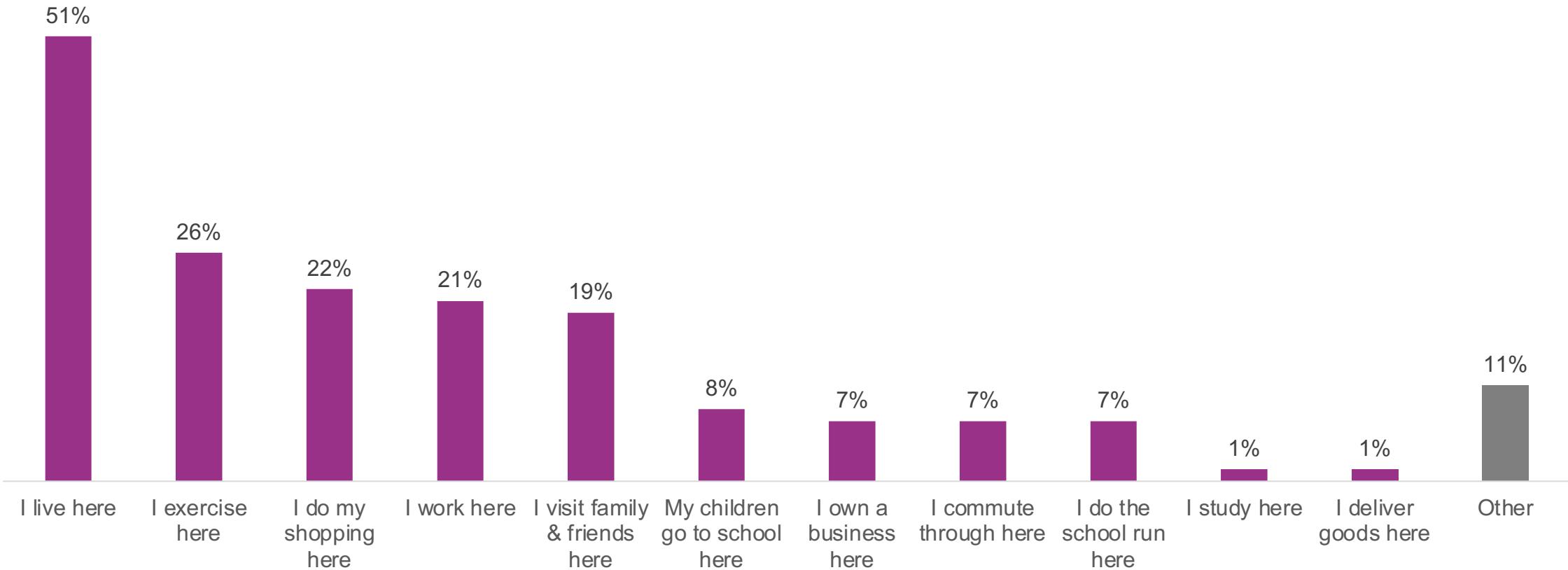
**LIVERPOOL
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COMBINED AUTHORITY

METRO MAYOR
LIVERPOOL CITY REGION

Base: 73 unique respondents

**EVIDENCE, RESEARCH
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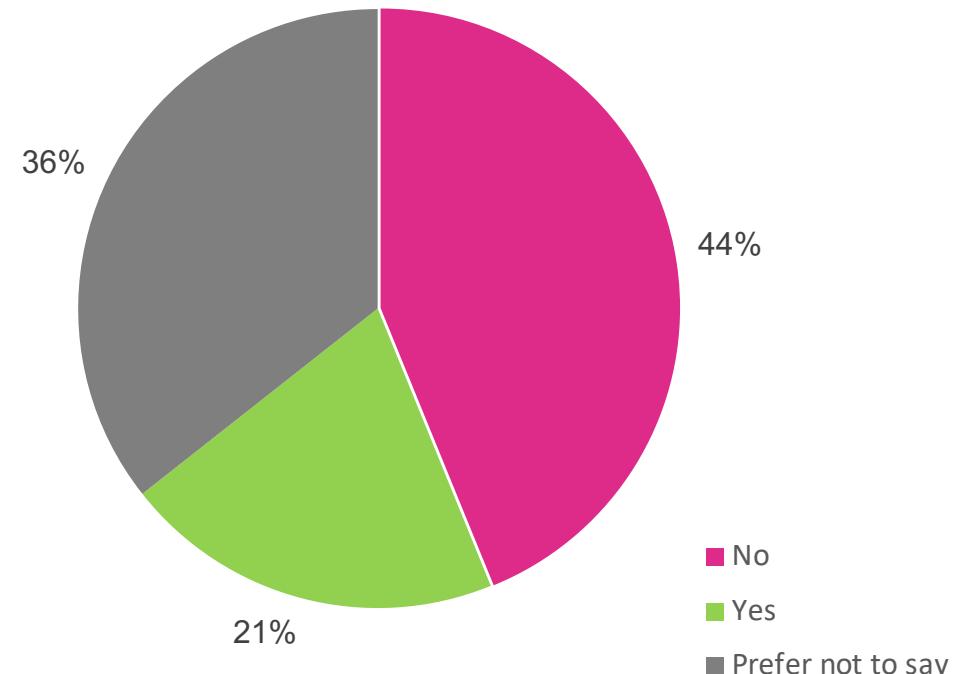
Connection to area



Employment Status



Completed on behalf of organisation



Appendix: Suggested Other Policies



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& INTELLIGENCE

Other Policy Suggestions

What other policy approaches / areas do you think should be covered by the SDS?	What evidence (for example studies, information, data) is available or needed to support your suggestion?
WE think a major omission is the lack of reference to the heritage of the city region. It's the area's calling card for many residents and visitors. It needs to be coordinated at the level of the city region to ensure consistency of approach across the localities and maximise its impact. There also needs to be an audit of the heritage assets across the City region and an effective link with the tourism and culture groups. This would cover the emerging number of heritage trails but also look at the threats to these assets in the context of the emerging "protected" zones proposed in the new planning framework by government.	The audit referred to above and the coordination of marketing and policies to protect the physical fabric of these assets.
It is wonderful to be focused on SDG13, Climate action and alternative energies, a good health and a good education, practically all 17 UN SDGs. But, if we are insisting on SDG8, SDG9, SDG12, and SDG 17, we can create a more develop and sustainable city from all points of view, and this are influencing the other SDGs like poverty or good health, for example.	This information is supported by all data and evidence from UN and based on research. More than that it is a rational strategy because some SDGs are influencing the others and we must to create an effective balance between all of them.
Do nothing, and stop wasting money. Get investment in Liverpool, the rest will follow.	
I think the SDS already covers all the relevant areas.	

Other Policy Suggestions

The consultation invites comments by respondents on the scope of the consultation. It asks what areas the SDS needs to cover more.

Planning for the city region's housing needs:

HBF understands that the detailed issues relating to housing numbers, and how this will be distributed across the city region, is a matter for the next phase of consultation. We understand that the LCRCA's preferred approach is for each local authority to address its own housing needs within its own administrative boundary: i.e., there is no scope for cooperation among local authorities to ensure that the housing need is addressed in full. This means that the SDS would, in effect, be six local plans joined together by some shared policies, rather than a genuine strategic plan which treats the city-region as one housing market area (as in the case of Greater London).

Given the recent changes to the Standard Method for calculating housing need (published December 2020), which now sees a considerable increase in the number of homes that Liverpool City must plan for compared to its soon to be adopted local plan requirement, and reductions in four of the other authorities compared to potential capacity, we recommend that the LCRCA rethinks this approach. See the table provided below that compares current and emerging local plan housing requirements with the New Standard Method.

(Continues on next slide)

Other Policy Suggestions

Continued....

The ability of Liverpool City to continue to sustain its current rates of house building, which has been largely dependent on the construction of apartments, could be in doubt, especially when the market for apartments is expected weaken given the twin effects of Covid-19 and the repercussions of the cladding crisis. Plan-makers will need to be more circumspect about the ability of the market to continue to construct such homes. The latest SHMA for Liverpool City identifies that at least 70% of its future housing requirement should be provided as houses (detached, semis and terraced) compared to flats. This is to provide a more balanced housing market and respond to the need for more family housing to compensate for so many apartments being built over the last 15 years. Despite this, the Council's consented supply as of April 2019 – evidence used in the recent local plan examination (see Liverpool City Council's Matter 3 Statement) shows that it will be providing 16,407 flats compared to just 1,747 houses. This represents a serious imbalance compared to the evidence in the SHMA of the need for larger family housing. The SHELMA of December 2017 also considered the issue of housing mix and it concluded that there was a need for 30-50% three-bedroom homes and 5-25% four or more-bedroom homes. While it is possible build three-four-bedroom flats, this is not the type of home that most households will want, especially if they are raising families.

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Other Policy Suggestions

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It is the view of many, including the LEP, that the future growth of the city-region will require the supply of more houses with gardens in order to attract and retain a highly skilled workforce. Liverpool City is unlikely to be able to accommodate all its need for family homes within its boundary so cooperation with the rest of the city-region will be critical.

The Draft Local Industrial Strategy for the Liverpool City Region (initially prepared in March 2020 but under review in the light of the pandemic) identifies five core competencies to enable the city region to grow. These are set out on page 5 of the document and are:

- Digitalisation
- Sustainability
- Science
- Innovation
- Creativity

To realise these aims the report identifies the following 'foundations for productivity' (see page 6). The report states:

"The full potential of the opportunities that exist can only be unlocked if the foundations of the Liverpool City Region economy are sufficiently strengthened. Performance gaps must be addressed in order to level up with the rest of the UK economy and maximise the potential for transformation.

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Other Policy Suggestions

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These foundations are:

- Thriving and distinctive places (places): Liverpool City Region will create homes and neighbourhoods that support people's health and wellbeing, expand and enhance the natural environment, and act as a magnet to attract the best of national and international talent.
- The opportunity to turn potential into prosperity (people): Liverpool City Region will ensure that its people have the health, skills, and opportunities to realise their full potential.
- A dynamic business base creating opportunity (business environment): Liverpool City Region will support more businesses to grow, and deliver high quality, sustainable employment opportunities for the whole City Region.
- Collaboration that translates innovation into impact (ideas): Liverpool City Region will enable the collaboration between innovators in research, industry, and society that will create social as well as commercial value.
- Connecting all communities to opportunity (infrastructure): Liverpool City Region will deliver the strategic infrastructure that will enable all of this to happen.

Only when these gaps have been addressed, will Liverpool City Region be able to achieve a truly competitive, clean and inclusive economy. And, only then, can the full benefits of this economy be maximised."

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Other Policy Suggestions

Continued....

It is clear from this, that one of the keys to realising the full potential of the city region will be to generate higher skilled employment opportunities. While it is right that the city-region and the private sector should work together on initiatives to train the existing population to meet some of these employment requirements, this will be a longer-term process. Consequently drawing employment from outside the city-region will be inevitable if key sectors identified in the Draft Local Industrial Strategy like tech and AI, industrial digitalisation and health research are to grow. The workers employed in these sectors are unlikely to want to live in a flat in Liverpool or Birkenhead, and to avoid them living outside of the city-region (in Cheshire say) with the city-region losing out on related tax revenues and local spending, it will need to provide more well-built, well-designed, energy efficient, family-sized homes that will appeal to this cohort of workers.

HBF would welcome the opportunity to discuss the Combined Authority's proposed strategy relating to housing supply over the next couple of months.

Local democracy and local community input into development plans

Think a lot of communities are fed up with 'consultation' which involves them being asked what they think about a development and then it happening anyway despite their concerns. I think instead of developers coming and imposing development on communities - as long as they can fit their plans into the particular criteria set out for planning decisions - that development should be community led with its core function being to meet the needs of local people. I'm pretty convinced this is a good idea, but you could always carry out a community consultation to see if people agree!

Other Policy Suggestions

National Union of Students Proposals Regarding the SDS and Purpose-Built Student Accommodation.

Over the last 7 years, NUS has worked closely with colleagues at the Greater London Authority (GLA) and the London Mayor's Office on the development of two 'London Plans', the forthcoming version and the 2016 version of Greater London's Spatial Development Strategies (SDS).

In particular, we worked with the GLA in developing a novel aspect of the forthcoming London Plan (Policy H15) which regulates the development of the Purpose-Built Student Accommodation (PBSA) sector – both owned and managed by universities and those run by other organisations (mostly for-profit companies) - in a variety of ways. Most primarily the measures seek to boost the provision of affordable PBSA stock. You can read Policy H15 in full in the Intend to Publish New London Plan.

https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf

In summary, our work with the GLA developed three key regulations in the new London Plan:

1. To secure planning permission, all new PBSA developments must commit to having 35% of their rooms available to rent at an 'affordable' rate – defined as 55% of the maximum possible maintenance loan available to a UK undergraduate living away from home.

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Other Policy Suggestions

Continued....

2. All new PBSA developments must either be delivered by a university, or if they are delivered by a non-university provider they must have at least 50% of their bed-spaces governed by a formal 'Nominations Agreement' with a university.
3. All the 'affordable' bed-spaces must fall within the Nominated 50% to ensure the university can allocate those rooms to students most in need of affordable accommodation.

There is currently a severe and worsening affordability crisis in the PBSA sector which impacts on educational access, opportunities and outcomes particularly for disadvantaged groups of students, impacts on students' welfare and has repercussions for the wider rental market economy and architecture. This consultation response argues that the SDS should specify similar regulations to those present in the Intend to Publish London Plan and the Liverpool City Region Combined Authority (LCRCA) should work with NUS, local students' unions and their members, universities, PBSA providers and community stakeholders to explore the introduction of these measures. In NUS' work with the GLA we initiated an 'academic forum' to begin these discussions.

<https://www.london.gov.uk/what-we-do/planning/who-we-work/planning-working-groups/mayor%E2%80%99s-academic-forum>

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<https://www.london.gov.uk/what-we-do/planning/who-we-work/planning-working-groups/mayor%E2%80%99s-academic-forum>

NUS would also add that, whilst many aspects of the latest London Plan have been challenged by the Ministry of Housing, Communities and Local Government, none of the measures regarding PBSA were challenged. This indicates that such measures have central government consent and are viable.

Student Affordability Crisis

NUS and UNIPOL's Accommodation Cost Survey 2018 (3) found that average rent levels in the PBSA sector in the 2018/19 academic year accounted for 73 per cent of the maximum possible available student maintenance loan a UK undergraduate student can access (and most do not access it). This was up from 58 per cent only six years ago. Rents in PBSA have consistently outstripped RPI inflation and in 2018/19 the overall average weekly rent stood at £147, an increase of five per cent since the prior year, of 8.9 per cent on 2015/16 and 31.3 per cent since 2011/12. The average for the private sector is £153, 9.3 per cent higher than the university mean of £140 – although the university mean is still extreme.

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Other Policy Suggestions

Continued....

https://www.unipol.org.uk/getmedia/ead8ba2b-d770-4127-83e2-0dc93835e2d8/AccommodationCostSurvey_2018_FullReport_WEB.PDF.aspx

NUS and UNIPOI are soon to start work on the Accommodation Cost Survey 2021 and initial data shows that rent-rises have continued at a similar annual rate. Furthermore, because of the Covid-19 pandemic it seems highly likely that the additional costs the pandemic has placed on university and PBSA provider finances will result in even more significant rent increases in the near future in an effort to recoup losses without local or national government intervention.

Rents in the PBSA sector far outstrip those in the wider Private Rented Sector (PRS) where students typically live in HMOs rented from smaller portfolio landlords. According to Knight Frank's latest student accommodation survey on average students living in private PBSA are paying £7,200 per annum for their accommodation. This compares with an average of £6,650 for those living in university-operated accommodation and £5,900 for students living in privately rented house shares.

<https://www.knightfrank.com/research/knight-frank-ucas-student-accommodation-survey-report-2021-7707.aspx>

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Other Policy Suggestions

Continued....

The data available for Liverpool City Region specifically is more limited. Our Accommodation Cost Survey 2018 showed the North West to be one of the more 'affordable' markets for PBSA with university accommodation mean rents standing at £122 and private sector at £130. It is important to say that, whilst more affordable than other regions, even these mean rents did not meet NUS' affordability standards of being less than 50% of the maximum maintenance loan available to a home undergraduate student studying away from home. The London Plan utilises this definition of affordability as its benchmark.

Furthermore, we do not believe this North West mean rent to be reflective of the Liverpool City Region PBSA sector. The North West contains much more affordable PBSA markets that will skew these figures (e.g Bolton). Whilst reliable data for Liverpool City Region specifically is unavailable, a quick glance at the rents on offer in major universities in the City Region illustrates this assertion. Furthermore, we also know that the most unaffordable PBSA stock is concentrated in the 'direct let' private PBSA sector, where no partnership agreements are in place with universities. The regulations introduced via the London Plan were designed precisely to bring rents down in the private sector by ensuring all PBSA developments must have a formal link with a university, who can influence rental costs, to be given planning permission.

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Other Policy Suggestions

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Whilst available data on the rental costs in Liverpool's student HMO market is limited, from discussions with students and their students' unions the vast majority will pay significantly less than £100 per week regardless of whether they live in the Smithdown Road area, Kensington Fields, the City Centre or further afield. There is clearly a significant disparity in rental costs for students between the PRS and PBSA sectors in the Liverpool City Region.

This affordability crisis caused immense problems for students for many years, but the impacts of sky-high rents has been highlighted particularly during the pandemic. NUS' latest data shows that 22% of students had fallen into rent arrears during the pandemic.

<https://nus.unioncloud.org/articles/student-renters-face-a-financial-crisis-due-to-the-pandemic>

Citizens Advice put the figure of rent arrears for students in the pandemic at 16% - higher than the average private renter.

<https://www.citizensadvice.org.uk/Global/CitizensAdvice/Housing%20Publications/New%20year,%20same%20arrears.pdf>

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Other Policy Suggestions

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Another benefit of the London Plan measures requiring a formal link to be in-place between a university and a private sector PBSA provider is that the Public Sector Equality Duty is extended into the private accommodation sector. Furthermore, universities have a much better record regarding the provision of specialist or accessible accommodation for disabled students and other demographics. Boosting the provision of accessible accommodation for disabled students in the City Region is essential for widening access to higher education.

Impact on the Wider City Region

This disparity between PRS rents and PBSA rents, combined with other factors, is putting Liverpool's student rental market off-kilt. A dearth of new housing developments and the presence of Article 4 directives in many areas of Liverpool popular with students means that rising student numbers must be met with increased developments of PBSA. The increasing demand for student housing combined with the availability of huge rental yields in the PBSA sector means investors are prioritising the development of PBSA over other types of PRS housing that could be used by both students and other residents. This is an inefficient use of land, especially given the fact that PBSA developments are not required by current planning regulations to contribute to affordable housing either within their development or through

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Other Policy Suggestions

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any form of Community Infrastructure Levy. Furthermore, if student numbers fall at any time these PBSA developments will struggle to be repurposed for other means.

The London Plan PBSA affordability measures were designed to reflect the wider planning regulations on affordable housing contributions for non-PBSA developments in the Capital. We believe it is wrong that significant levels of unaffordable PBSA is being built in Liverpool City Region, with no requirements to contribute to affordable housing either for students or the wider community. There is also a significant risk that the overdevelopment of expensive PBSA risks pushing rents up in the wider rental market for students and non-students alike.

Furthermore, this current imbalance between the PBSA and PRS sectors means that a growing proportion of students will be forced to rent in the PBSA sector which is more expensive and less socially embedded in the wider community. This is bad for widening access to higher education, student welfare and for the City Region. Extortionate PBSA rents are swallowing up ever-larger amounts of student maintenance loans and other disposable income from students which is unproductive extraction. Given the substantial investment that students make to the City Region economy, both through government-backed student finance and wider disposable income,

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Other Policy Suggestions

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increasing the affordability of renting in PBSA will, by definition, increase the amount of money spent by students in productive areas of the City Region economy. Furthermore, students are currently attracted to the Liverpool City Region because of its apparent offer of affordability. Without regulation of the PBSA rental market this will simply cease to be a feasible marketing strategy for the City Region and its higher education institutions.

The London Plan measures have recognised the importance of ensuring that students are part of a “mixed and inclusive neighbourhood”. We are aware that there is a growing anger amongst many City Region residents about the overdevelopment of PBSA and the architectural and social impact that it is having on the City Region. Indeed, it is evident that many recent PBSA developments have been highly speculative and caused significant issues for the City Region. To reiterate, one purpose of the London Plan measures is to give universities and local government greater strategic control and oversight over the types of PBSA being built by demanding a formal partnership link with a university. As universities are most aware of their plans for student numbers, better understand the housing needs of their students and have accountable governance arrangements the London Plan measures will help prevent speculative PBSA developments.

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Other Policy Suggestions

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Whilst we recognise that the immediate issues associated with PBSA are concentrated in the Liverpool City Council area they're not exclusively and will not necessarily remain so in the near-future – with ongoing higher education institutional expansion and rising student numbers. Furthermore, measures to address the development of PBSA via the SDS will have impacts on, for example, the wider City Region economy as well as the architectural prowess of the area.

We hope that the LCRCA can consider further discussions with NUS to explore the replication in this forthcoming SDS of the measures established by Labour colleagues in the GLA via the London Plan. We believe such measures would be to the significant benefit of students and the wider City Region economy and resident

These representations are made on behalf of the Peel Group (hereafter referred to as "Peel").

Peel welcomes the preparation of the SDS to support the continued regeneration and growth of the LCR for the benefit of its communities and stakeholders. It recognises the value of a plan-led approach and a strategic perspective across the economic geography of the LCR.

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It is vital that the SDS is based on robust and up to date evidence. The process of gathering this evidence should start now and be subject to engagement and consultation as the SDS progresses.

As a minimum, the SDS should be based upon and fully informed by the following:

(a) An up to date Housing and Economic Needs Assessment (HENa) which takes account of the vision of the SDS and the ambitions of the LIS; LEP;

Other Policy Suggestions

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However, the scope of this engagement focuses predominately on non-strategic policies and is accompanied by no evidence of development needs. While these policies will become an important component of the SDS (as a whole), it is premature to consult on them before dealing with strategic policies; particularly as the SDS is a strategic plan dealing with strategic spatial planning matters (i.e. housing / employment requirements and spatial distribution). Peel raised the need for the SDS to be evidenced based, to plan for and meet identified needs for housing and employment and to set a clear spatial framework for meeting these needs in previous representations. It is disappointed that these points have not been addressed and urges the CA to address these points before progressing the SDS.

The SDS will give the LCR a strategic platform to address strategic issues. Hence, it critical that communities and stakeholders, such as Peel, are given the earliest opportunity to shape the SDS and to ensure the strategy covers key strategic spatial matters such as:

- (a) Meeting housing and employment needs and the ambitions of the LCR;
- (b) Planning positively for cross boundary assets, such as the Port of Liverpool and Liverpool John Lennon Airport;
- (c) Reviewing strategic designations such as the Green Belt; and

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SEPs; and other strategies. There is precedent for the commissioning of evidence of this nature in the form of the Strategic Housing and Employment Land Market Assessment (SHELMA, 2018) which included an attempt to evidence the employment land and housing needs across the LCR reflecting an ambition for growth and investment. Where the fragmented nature of Local Plan development has undermined a consistently positive approach to planning for the overall need, the SDS represents an opportunity to ensure that the LCR's ambitions will be supported through planning for a sufficient number of new homes;

(b) A full and objective understanding of how the need for different types of development (in particular of employment and homes) will be accommodated within individual boroughs allowing for market signals, specific needs and importantly the current housing stock and supply of existing employment land and premises, taking into account any deficiencies which are identified.

(c) A robust assessment of the existing land supply including its suitability, availability and deliverability. This must include a robust assessment of its viability in accordance with national policy.

(d) An integrated assessment of the infrastructure needed to support the delivery of the SDS including:
– Transport – all modes of transport including consideration of international, national, regional and local connectivity;

Other Policy Suggestions

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(d) Conserving strategic environmental value of assets such as the European nature conservation designations.

Peel requests that the SDS should be genuinely strategic in nature and not repeat or go further than existing national policies or set standards that should more properly be applied through Local Plans. The SDS should:

(a) Set an ambitious and positive vision for the LCR over the next 20 years and beyond which responds to the Government's 'levelling up' agenda and the scale of inequalities starkly illustrated by the pandemic. The SDS must be aspirational but deliverable and anticipate and respond to long-term requirements and opportunities such as those arising from major improvements in infrastructure. This ambition must articulate the additional opportunities brought by joint planning, and reflect the scale of investment already secured (The LCR has already received £900 million as part of the devolution deal, to be paid over 30 years, along with a further half a billion pounds including additional funding from the Transforming Cities Fund, and support to connect Liverpool to the HS2 network).

(b) Establish clear, measurable strategic objectives for economic growth that support the achievement of that vision and can be translated into quantified evidence-based policies for the provision of employment and housing land.

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- Social infrastructure such as education; health; leisure and wellbeing facilities;
- Energy – generation and transmission; and
- Utilities and digital.

(e) Existing strategies and plans for economic drivers such as the airport, ports, and universities; and the needs of key economic sectors such as bio-sciences; pharmaceutical; creative and digital; freight and logistics; maritime; and the visitor/tourism economy. Where necessary these should be re-assessed and updated to take account of the latest investment plans and the outcomes of new evidence-based assessments. The impact of this investment must be appreciated in the updated HENA, noted above, to ensure that subsequently planning policies are sound.

(f) Green Belt Review – objective assessment of the purposes and functions of the current Green Belt and a review of how to achieve sustainable patterns of development.

(g) Sustainability Appraisal – a legally compliant assessment of the SDS against robust sustainability objectives.

Other Policy Suggestions

Continued....

(c) Contain fully integrated strategic policies to address the CA's priorities for the development and use of land and establish an overall strategy for the pattern, amount and quality of development for:

- Homes of mixed type and tenure (including family and affordable homes);
- Employment; retail; and leisure;
- Infrastructure (social and physical); and
- Conservation of the built and natural environment.

(d) Include a spatial expression of this identifying:

- The role of the LCR's settlements in regeneration and growth – including identifying the likely scale of growth envisaged;
- Key economic assets that will be sustained and grown – whether they be economic drivers such as the city centre, port and airport; vital employment clusters/corridors such as south Liverpool international gateway; or sectors such as the tourism, visitor and cultural heritage sector;
- Key infrastructure required to achieve the vision and deliver the strategic priorities; and
- Main areas/corridors where growth and investment can be accommodated and how these will need to be interpreted in the district level local plans.

(e) Determine how housing supply will be distributed within the LCR, to effectively address the above and ensure that needs are fully met in a

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Other Policy Suggestions

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sustainable manner. The recent evolution of the standard method, and the introduction of a 35% uplift for the twenty largest cities – of which Liverpool is one – mean that there is now implied to be a need for at least 4,381 dwellings per annum across the LCR as of early 2021. A still greater need, for some 4,908 dwellings per annum, has previously been considered likely in an economic growth scenario . A failure to plan for the provision of this housing within the LCR risks exacerbating unsustainable commuting patterns and worsening affordability. Furthermore the importance of considering housing needs holistically across the LCR is underlined by an acknowledged need to elevate the provision of larger family housing in order to attract and retain a workforce to match the ambition of a higher value economy. Concentrating provision of new homes in Liverpool – where the current plan is to provide 16,497 flats and only 1,747 houses , with 46% of these homes having only one bedroom – would fundamentally fail to respond to this need or indeed the growing aspiration for houses with gardens, now emerging as a result of the pandemic. Similarly, where it is recognised that there remains an acute need to provide more affordable housing, an LCR-wide approach is required to ensure that homes respond to local needs while accounting for the viability of individual schemes.

(f) Similarly enable the strategic approach to employment land provision that is necessary given the distribution of current and emerging assets and the

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Other Policy Suggestions

Continued....

inter-connecting transport corridors. The LCR's ongoing failure to reach agreement on how an evidenced shortfall of land suitable for large-scale B8 uses will be addressed clearly illustrates the importance of the SDS overcoming such issues, by providing a clear and positive planning framework to accommodate greater than local needs. The SDS will therefore need to determine, at least in broad spatial terms, where such strategic sites should be provided for in Local Plans taking into account market demand, environmental constraints, infrastructure and future planned investment. Such an approach will be vital in ensuring that the plan-led system fully supports and captures the benefits of opportunities such as the designation of a Freeport and the expansion plans of LJLA. If the SDS fails to provide this positive policy framework, the LCR would be at a competitive disadvantage with future growth potential stymied.

(g) Set out strategic environmental and sustainability policies and spatial designations that are established on a consistent basis across the LCR. In doing so the SDS should avoid repetition of national policy/standards. Examples of matters which the SDS, as a strategic cross-boundary spatial policy document, should properly address include any impacts on the SPAs within the LCR and consideration of whether exceptional circumstances exist to justify a review of current Green Belt boundaries. It is noted that the scope of the SDS may exclude consideration of Green Belt. Peel considers

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Other Policy Suggestions

Continued....

that the SDS is the right place to undertake such a review and that to exclude it risks pre-judging whether exceptional circumstances to justify Green Belt review exist. Peel requests that the CA reconsiders this issue carefully once it has established the vision of the SDS and assesses development needs. If the SDS is to exclude consideration of Green Belt it must at least make clear that Local Plans must consider whether exceptional circumstances exist and where necessary undertake Green Belt Review.

This strategy must take specific account of the spatial development associated with the further development of the Port of Liverpool and subsequent linked developments.

The relationship between the Port and the city region will have a critical effect on the environment, the economy, the health and wealth of the region as well as wider impact on climate change. A failure to address this crucial relationship will undermine the region's spatial strategy and all of the sub strategies.

Considerable academic literature and experience is now available regarding port development and all of this literature points to the short sightedness of taking the line of least resistance in developing the port and its access.

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Information/Data: Local MPs and Council oppose both the unchecked expansion of the port of Liverpool AND the road proposal. Thousands of members of the public oppose this. See "Save Rimrose Valley" online for confirmation of numbers.

Studies: We suggest that the report commissioned by Sefton Council by ARUP entitled Inland Port and Connectivity Concept provides a good template for future policy activity

<https://mysefton.co.uk/wp-content/uploads/2020/11/Inland-Port-and-Connectivity-Concept.pdf>

Other Policy Suggestions

Continued....

This is exactly what is happening with the Port of Liverpool Access Scheme which plans to build a road through Rimrose Valley Country Park. This proposed solution not only merely shifts pollution from one site to another but destroys a valuable green resource. Furthermore in the medium to long term it will prove to have been a temporary solution as the proposed new road itself will not have capacity to manage the further port growth.

There should be specific policy goals to integrate land and sea networks, port and urban functions, logistics activities, and intermodal potentials, looking at a wider regionalisation strategy whereby inland distribution becomes of foremost importance in developing the port and the strategy actively favours the development of environmentally friendly and sustainable transport corridors.

We make no comments in this respect.

The policy approaches / areas are generally robust in their content, however this will need to be further examined as more detailed work starts coming forward. We would be happy to work with LCRCA and other organisations to discuss various matters identified including, but not restricted to;

Flood Risk
Climate Change

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We make no comments in this respect.

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Other Policy Suggestions

Continued....

Water Quality and Water Resource
Biodiversity
Brownfield Land (contaminated land)
Open Spaces

We note there is no specific policy approach for infrastructure however it was our understanding the SDS may be supported by a city wide infrastructure plan. This might be something you wish to consider.

No comments,

Report by:

Morag Haddow, Research & Intelligence Officer



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