

Appendix A: Halton’s Representations to Liverpool City Council’s Core Strategy Preferred Options Report

Page / Preferred Option	Representation / Issues Raised
35 / PO2: Employment Land Supply	<p data-bbox="539 352 1935 384">Halton BC has concerns about the content of Preferred Option 2, as the policy wording lacks clarity.</p> <p data-bbox="539 421 1962 485">Having regard to paragraphs 4.19 and 4.20 of PPS12 and the emerging North West Regional Spatial Strategy (RSS), it is questioned whether the Preferred Option accords with the tests of soundness vi) and vii).</p> <p data-bbox="539 521 1995 620">It is not clear in the Preferred Option 2 text box, that the proposed take of 330 hectares for Liverpool is additional employment land required, or includes land which is allocated in the LCC UDP, or land which has existing planning permission for employment land use.</p> <p data-bbox="539 657 2002 858">It is not currently apparent on which version of the Draft RSS that the calculation for employment land required in Liverpool is based. The submitted Draft RSS (January 2006) makes calculations based on an exclusion of Regionally Significant sites, whereas the Panel Report on Draft RSS (May 2007) does include them. These two approaches vary dramatically. However, in the light of the publication of the Secretary of States Proposed Changes to Draft RSS (March 2008), we can assume that Regionally Significant sites are included in the calculation of employment land required by Local Authorities.</p> <p data-bbox="539 895 2007 1096">It is not clearly indicated whether some of the Strategic Investment Areas listed are recognised as Regionally Significant. The Preferred Option does not make it clear what proportion of the 330 hectares of employment land will be allocated in these Regional Sites: this information would be helpful in aiding comparison with the RSS in terms of approach of dealing with employment land issues. It is assumed that this allocation is for the plan period, from 2006 until 2024. This provides additional confusion for any attempted comparison with the employment land allocations in the Draft RSS, which is for the period 2005-21.</p> <p data-bbox="539 1133 2018 1232">Another issue requiring clarification is whether the RSS employment land allocations are to be treated as maxima or minima at the Local Authority Level. This is not clarified either way within the content of Preferred Option 2 or its supporting context, and is ultimately a matter for confirmation with the North West Regional Assembly.</p> <p data-bbox="539 1268 1912 1332">In addition, the statement in paragraph 5.20 that “the total figure for the city is 333 hectares, which broadly represents the current supply allocated in the Unitary Development Plan together with sites with planning</p>

permission” is confusing, as it is inconsistent with the 330 hectares stated in Preferred Option 2. It could be that the figure of 330 hectares in Preferred Option 2 relates to wholly additional employment land required, while the figure of 333 hectares in paragraph 5.20 relates to existing employment land (UDP allocations and planning permissions), but this is not explained at any time.

For this Preferred Option to meet the respective tests of soundness at submission, all of the points highlighted above must be subject to clarification.

Halton BC has concerns about Preferred Option 2, as the evidence base report on which it relies, the Land for Employment and Economic Growth Study, has not been made available during the consultation period.

Having regard to paragraphs 4.19 and 4.20 of PPS12 and the emerging North West RSS, it is questioned whether the Preferred Option accords with the test of soundness vii).

It is possible that some of the issues identified as requiring clarification from Liverpool CC may be resolved with consideration of the Land for Employment and Economic Growth Study, which is a key piece of evidence for this Preferred Option. However, this document has not been made available to Halton BC during the consultation period.

For this Preferred Option to meet the respective test of soundness at submission, all evidence base documents must be made available.

Halton BC has concerns about Preferred Option 2, as Liverpool’s review of the supply of employment land was not conducted jointly with other local authorities, as stated is necessary in the emerging RSS.

Having regard to paragraphs 4.19 and 4.20 of PPS12 and the emerging North West RSS, it is questioned whether the Preferred Option accords with the tests of soundness iv) and vi).

The lack of joint working on employment land issues presents problems, which are identified in Paragraph 8.12 of the submitted Draft RSS: “The provision of figures by sub-region will require Local Authorities and other partners to work together to agree distribution of land within each sub-region”. Paragraph 5.22 of the Draft RSS Panel

	<p>Report builds on this, stating, “We are particularly concerned that the allocation of appropriate sites for employment development (and the reduction of existing commitments where there is currently a surplus of employment land at the sub-regional level) will depend upon a considerable degree of joint working and cooperation between local planning authorities... If this fails to transpire, there could be serious over- or under-provision, particularly if LDDs covering different parts of a sub-region come forward in isolation from each other.” The SoS Changes to RSS are also in accordance with this sentiment. The fact that Liverpool have not followed this advice will have consequences for the approach to the allocation of employment land required for Liverpool themselves, and for the other authorities within the sub-region. It is currently unclear whether the 330 hectares of employment land referred to in Preferred Option 2 represents a very large proportion of the additional 476 hectares allocated by the SoS Changes to RSS for the Merseyside and Halton sub-region (2005-21).</p> <p>For this Preferred Option to meet the respective tests of soundness at submission, collaboration with neighbouring authorities and the Regional Assembly on the issue of employment land is required.</p>
<p>39 / Preferred Option 4: Liverpool John Lennon Airport</p>	<p>Halton BC has concerns about content of Preferred Option 4, as it confirms development associated with LJLA outside the local authority area of Liverpool City Council.</p> <p>Having regard to paragraphs 4.19 and 4.20 of PPS12 and the emerging North West RSS, it is questioned whether the Preferred Option accords with the test of soundness vi).</p> <p>Preferred Option 4 confirms the expansion of LJLA in line with its Master Plan. It should be noted that Halton BC are broadly supportive of the expansion of the Airport in this way.</p> <p>The new access road from the east of the Airport is partially located within the boundary of Halton BC, and on land currently designated as Green Belt. According to the LJLA Master Plan, the preferred route for the road will be from the existing Hale Road adjacent to the Airport (in Liverpool) and join Speke Boulevard/A561 (on the boundary between Knowsley and Halton). The proposed runway extension to the east of the existing Airport also encroaches on the Halton BC boundary.</p> <p>Liverpool CC, as a local planning authority, should not put a Core Strategy policy in place concerning development in an adjoining authority, even though both local planning authorities may agree in principle to the development (in this case, in conjunction with the LJLA Master Plan). Halton BC therefore has concerns about the</p>

	<p>expression of the policy content of Preferred Option 4.</p> <p>In addition to the concerns outlined above, access to development proposed in Liverpool’s Green Belt to the south of the existing Airport will require access routes through Halton BC. According to the LJLA Master Plan, expansion to the south of the Airport follows earlier expansion, including runway extension and the new access road, whose proposals directly affect Halton. To confirm that the Liverpool Green Belt boundary will change to accommodate these later expansions is taking for granted that the earlier expansions were permitted. Again, this is presuming that land in Halton will have been developed for Airport expansion, which is not within the scope of Liverpool CC as an adjoining local planning authority.</p> <p>For this Preferred Option to meet the respective test of soundness at submission, collaboration with neighbouring authorities on these issues is required. This joint working should include discussions concerning the content of Core Strategies, or other DPDs as relevant, in relation to Airport expansion.</p> <p>Halton BC suggests that joint working on issues associated with Airport expansion, between Liverpool CC, Halton BC, Knowsley MBC (and other authorities as appropriate) would be beneficial.</p> <p>Halton BC would welcome the opportunity to work jointly with Liverpool CC and other partners on the development of LJLA expansion. It is felt that joint working will ensure that maximum benefits are secured for each local authority, and for the wider environment. Development that is permitted in Liverpool’s section of the Mersey Estuary Protection Area (and Ramsar site), associated with the Airport, is likely to affect other parts of the estuary. Joint working or partnership working would definitely be desirable in this matter, but there is no reference to this in the justification of the Preferred Option 4. There is also an issue relating to the concept of the “wider” transport network associated with LJLA. This affects routes not within the boundary of Liverpool City Council, particularly within Halton and Knowsley and would again benefit from joint working.</p>
<p>42 / Preferred Option 5: The Location and Phasing of New Housing</p>	<p>Halton BC has concerns that the content of Preferred Option 5, as the time periods given for housing growth do not conform to those in emerging RSS.</p> <p>Having regard to paragraphs 4.19 and 4.20 of PPS12 and the emerging North West RSS, it is questioned whether the Preferred Option accords with the test of soundness vi).</p>

	<p>The time period given for the phasing of new housing development in Liverpool runs from 2006-2024. The time period given for phasing of new housing development in the emerging RSS runs from 2003-2021. This lack of accordance makes comparison with regional housing allocations difficult. Halton BC question the basis for starting the period for housing figures in 2006, when 2003 could be used, assuming that information is available on completions (from to 2003-2006) to facilitate this.</p> <p>For this Preferred Option to fully meet the respective test of soundness at submission, phasing periods given should accord with those given at the Regional level, and those used by neighbouring authorities.</p>
<p>45 / Preferred Option 6: The Mix of New Housing Provision</p>	<p>Halton BC questions the inclusion of a comment on affordability within the content of Preferred Option 6.</p> <p>Emerging RSS (policy L6) states that plans and strategies should set out requirements for affordable housing, and the location, size and types of development to which these requirements apply. The comment towards the end of Preferred Option 6 that “the final policies that emerge from this preferred approach will also take into account the ongoing review of the City Council’s Housing Strategy including matters of housing type, size mix and affordability”, does not make it clear whether the LCC Core Strategy will in fact include an affordable housing policy, and what content this may have. This has implications for Halton BC and Liverpool’s other neighbouring authorities, particularly where housing markets have the potential to overlap.</p>
<p>53 / Preferred Option 11: Enhancing Open Space and Biodiversity Provision</p>	<p>Halton BC suggests that joint working on some of the areas mention in Preferred Option 11 would be beneficial.</p> <p>Efforts to protect the Mersey Estuary SPA, Mersey Waterfront Regional Park and Merseyside BAP are welcomed, but there is no recognition that these are cross-boundary issues and would benefit from joint working between local planning authorities, organisations and private sector partners. This is particularly relevant where development may affect the Mersey Estuary SPA / Ramsar Site.</p>
<p>60 / Preferred Option 14: Improving Accessibility, Managing Demand for Travel and Delivering Key Projects</p>	<p>Halton BC has concerns about the content of Preferred Option 14 on the basis that joint working has not yet occurred.</p> <p>The confirmation of the provision of a new airport link road would require joint working between the relevant local planning authorities (including Liverpool, Halton and Knowsley Councils) on the content of respective Core</p>

	<p>Strategies and other relevant DPDs. This has not yet occurred. This concern is expanded on in the comment on Preferred Option 4, above.</p> <p>However, efforts in increase the proportion of passengers arriving and departing the Airport by public transport is supported.</p>
<p>71 / Preferred Option 17: Strategy for the Outer Areas of Liverpool.</p>	<p>Halton BC supports the recognition of the important role of the Mersey Gateway Bridge in addressing strategic transportation issues in the sub-region.</p> <p>Halton BC suggests that joint working would be beneficial to achieve effective mitigation of the impacts of the expansion of LJLA.</p> <p>The principle of joint working is important to achieve appropriate mitigation of the impact of LJLA's expansion on residents and its environmentally sensitive location, both in Liverpool and in Halton. It will also be important to work collaboratively on any appropriate assessment associated with the Airport's expansion, as it will necessarily affect areas in both Liverpool and Halton. Of particular importance is the impact of Airport expansion on the Mersey Estuary Ramsar, which lies adjacent to LJLA and extends into Halton.</p>