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Development Plans Team
Planning Service
Municipal Buildings
Dale Street
Liverpool L69 2DH

Email: development.plans@liverpool.gov.uk

Telephone: 0151 233 3021
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Appendix 1. List of Individuals and Organisations Consulted During Plan Preparation

Appendix 2. Summary of Revised Preferred Options Report comments received and the City Council response

NB: In the earlier stages of preparation of the Core Strategy, the spatial sub-areas of Liverpool are referred to by the names adopted at the Preferred Options Stage: City Centre, Inner Areas and Outer Areas. From the Publication of the Submission Draft Stage onwards, these areas (with identical boundaries), are referred to as City Centre, Urban Core and Suburban Areas.
1. Introduction

Overview

1.1 The 2004 Planning and Compulsory Purchase Act (amended 2008) requires all Local Planning Authorities to prepare a Local Development Framework (LDF), to guide the long term, strategic spatial development of the authority area. LDFs comprise a number of Development Plan Documents (DPDs). The Core Strategy is the primary development plan document, dealing with matters at the strategic level only. This means that its main purpose is to identify broad locations, but not the individual sites, for delivering housing and employment land to meet Liverpool’s objectives for sustainable regeneration and growth, together with the associated retail, leisure, community, and essential grey and green infrastructure. It will also address environmental protection issues to ensure the City’s built and natural assets are safeguarded, and contribute to the City’s regeneration. The Liverpool Core Strategy looks ahead to 2028.

1.2 Detailed policy relating to individual sites and management of development will be dealt with in one or more further DPDs.

1.3 The Core Strategy must take into account a wide range of policies, strategies and guidance produced nationally, regionally, sub-regionally and locally. Consistency with national planning policy, as set out in the Planning Policy Statements issued by Government, is essential, as is compliance with European regulations on sustainability appraisal and habitat protection.

1.4 Consultation with key stakeholders – the local community, local businesses, City Council partners and statutory organisations – is a key element of the preparation of documents within the Local Development Framework. This Consultation Statement sets out how the City Council has involved key stakeholders in the preparation and evolution of the Liverpool Core Strategy, and provides a brief summary of the issues raised and how the City Council has responded to these in developing the next stage of the document. This document is split into the different stages of the document – Issues and Options, Preferred Options and Revised Preferred Options.

1.5 Preparation of the Core Strategy began under the regulatory provisions set out in 2004 (which made consultation on Preferred Options a formal stage) and is continuing under the amendments made in 2008 (which removed this requirement). The final stages of production are likely to take place under amended regulations following enactment of the Localism Bill.

1.6 This document is the statement referred to in Regulation 24, and is required to be produced to comply with Regulation 27 (Publication of a Development Plan Document) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. It sets out how the Council has met and complied with regulations related to community involvement and consultation during the preparation of the Liverpool Core Strategy.

1.7 Consultation and community involvement are a major part of the process of preparing planning policy documents, and there are various stages of consultation and community involvement that occur continually throughout the production of a planning policy document.

1.8 In developing the Core Strategy to its current stage (Publication of the Submission Draft of the Core Strategy), the City Council has undertaken three major consultation exercises, as well as ongoing dialogue with key partners throughout its preparation. This consultation comprised:

- Issues and Options stage
- Preferred Options stage
- Revised Preferred Options stage.

1.9 This document sets out the nature and purpose of each stage, who was consulted, how (including reasons for the methods used); a summary of the main issues arising from the consultation; and how these issues have been taken into account in the next stage of the Core Strategy preparation.

1.10 Under the 2004 Planning and Compulsory Purchase Act (Regulation 25), the Council was required to undertake early public consultation to identify the issues facing the City to be addressed in the Core Strategy, and options for dealing with these issues.
(the *Issues and Options Report*). This consultation took place between February and March 2006.

1.11 Under Regulation 26 (of the 2004 Regulations), the Council consulted stakeholders on the Core Strategy *Preferred Options Report* between March and April 2008. The Preferred Options Report developed the issues and options from the initial stage, and set out the Council's preferred way of taking these forward. As a result of the comments received, the Council was advised by Government Office for the North West to substantially alter the structure of the document, and the type of issues addressed. This was achieved by concentrating on the key elements of strategic importance and choice. The Preferred Options Report consequently had a different appearance, as it reduced the 50 issues considered at the previous Issues and Options Stage, by amalgamating them within a smaller number (17) of Preferred Policy Options.

1.12 As a consequence of the consultation responses to the 2008 Preferred Options Report, in 2010 the Council published for consultation the Core Strategy *Revised Preferred Options Report*, which presented three distinct and reasonable alternative delivery strategy options - an element missing from the previous two documents. To achieve this, the document took a more strategic view of the options open to the City, concentrating on the key choices for the location of land for new homes and employment. Consultation took place between February and March 2010.

1.13 Following on from this, the Council has prepared the Submission Draft of the Core Strategy which takes forward the option for the delivery strategy selected as a result of consultation on the Revised Preferred Options, and sets out strategic policies which deliver the Core Strategy's vision and objectives. This Consultation Statement accompanies the Core Strategy Submission Draft.

1.14 The Council received a large number of comments at each stage of consultation; this report provides a summary of the concerns set out in the main comments received. A large number of comments sought small changes, many of which did not involve changes to the text of policies. This report, however, concentrates on comments where consultees were seeking a major change to the Core Strategy.
Sustainability Appraisal

1.15 A Sustainability Appraisal has been undertaken at each stage of the Core Strategy. The purpose of sustainability appraisal is to ensure sustainable development is integrated into the Core Strategy, considering the social, economic and environmental protection objectives for Liverpool. The appraisal focuses on the potential significant sustainability effects of the strategic policies. The Sustainability Appraisal integrates the requirements of the Strategic Environmental Assessment Directive.

1.16 The City Council has involved key stakeholders in the sustainability appraisal process, from the Scoping Report consultation in 2005 to the consultation on the Submission draft in 2011, and all stages of the Core Strategy preparation in between.
2. Issues and Options Consultation (Regulation 25\(^1\))

January – March 2006

2.1 This was the first formal stage of Core Strategy preparation; however, the Council had already undertaken some preliminary evidence gathering as part of the review of the UDP. The Issues and Options Stage required the Council to gather evidence to help identify the issues facing the City to be addressed through the Core Strategy, and develop options to deal with these issues. The consultation period ran from 16 January – 31 March 2006.

Statutory Requirement

2.2 In terms of public consultation on the Issues and Options Paper, Regulation 25 (of the 2004\(^2\) Act) states that the local planning authority must notify and invite the specific and general consultation bodies that may have an interest in the Core Strategy to make comments on the Core Strategy.

Statement of Community Involvement (SCI) Requirement

2.3 At the Issues and Options stage the statutory requirements which are summarised in the SCI are to:

- Place the consultation documents on deposit;
- Send letters to statutory bodies and invite them to submit comments;
- Place the consultation documents on the website; and
- Place a press notice in the local newspaper

2.4 Community and stakeholder involvement at this early stage is a key principle of the planning system and known as ‘frontloading’. The aim of ‘frontloading’ or early involvement in the plan making process, is to achieve consensus on essential issues.

Who was consulted?

2.5 The individuals and organisations listed in Appendix 1 have been notified of the consultation periods during the preparation of the Core Strategy, and have been invited to submit comments.

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\(^1\) Town and Country Planning (Local Development) (England) Regulations 2004

\(^2\) http://www.opsi.gov.uk/si/si2004/20042204.htm
Methods Used to Consult

2.6 In addition to the statutory requirements of the SCI as outlined above, a number of methods were used to consult statutory bodies, delivery partners, local people, businesses, community groups, elected members and City Council officers.

2.7 The table below provides an overview of the types of consultation that were employed for the Issues and Options consultation.

<table>
<thead>
<tr>
<th>Consultation Method</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>The provision of consultation documents at key locations during set consultation period</td>
<td>Copies of Issues and Options Papers/ Response booklets were sent to all libraries and made available at Millennium House, on 16 January 2006.</td>
</tr>
<tr>
<td>Letters to statutory bodies (listed in Regulations)</td>
<td>214 covering letters and a copy of the Issues &amp; Options Paper and Response Booklet were sent to statutory consultees on 16 January 2006. The same information was sent to the City Council’s 90 Elected Members at the same time.</td>
</tr>
<tr>
<td>Internet (website, email-shot) (<a href="http://www.liverpool.gov.uk/ldf">www.liverpool.gov.uk/ldf</a>)</td>
<td>All documentation was made available on the website from 16 January 2006.</td>
</tr>
<tr>
<td>Media (press and broadcasting)</td>
<td>A press release was issued on 17 February 2006, and articles appeared in the Liverpool Echo and Merseymart papers on 25 February 2006. A notice advertising the last few days of the consultation period was placed in the Liverpool Echo on 01 April 2006. Other newsletters: Downtown Liverpool, Liverpool Housing Tenants Bulletin, Liverpool Community Environment Network</td>
</tr>
<tr>
<td>Leaflets / brochures</td>
<td>Leaflets were distributed to, and posters displayed at all One Stop Shops, City Council libraries, and various City Centre locations (e.g. cafes, information points) during the consultation period.</td>
</tr>
<tr>
<td>Public exhibition/displays/stalls/road shows</td>
<td>Attended Liverpool Community Environment Network open meeting on 31 March 2006. A stall was set up displaying leaflets, posters and copies of the Issues and Options Paper.</td>
</tr>
<tr>
<td>Letters and formal written consultation/questionnaire/community surveys</td>
<td>Letters advertising the start of the Issues and Options consultation were sent to 2,935 stakeholders listed on the City Council’s LDF database on 16 January 2006.</td>
</tr>
<tr>
<td>Telephone</td>
<td>All consultation documents and publicity material encouraged people to get in touch via telephone on 0151 233 3021.</td>
</tr>
<tr>
<td>One-to-one meetings with stakeholders</td>
<td>These were offered on an ad-hoc basis to interested parties. In addition, specific face-to-face meetings were held with a number of key delivery partners, including: • Other City Council departments • Ward Councillors, on request</td>
</tr>
</tbody>
</table>
Public sector delivery partners (e.g. Merseytravel, Liverpool Vision, Liverpool Land Development Company, NWRDA, GO-NW, English Partnerships, NHS, LSC)

Other key delivery partners, including Peel Holdings and the universities.

Neighbourhood committees

A presentation was made to each of Liverpool City Council’s ten Neighbourhood Committees during February, March and April 2006.

Focus groups / Workshops / Seminars

Seminars and presentations made during the consultation period included:

- 28 February 2006: Seminar attended by people representing business interests (invites sent 02 February 2006).
- 10 March 2006: Seminar attended by people representing the interests of local areas (invites sent 06 February 2006).
- 14 March 2006: Presentation made to the Board of Liverpool First (the Liverpool Partnership Group).
- 23 March 2006: Seminar at West Everton Community Council.
- 09 May 2006: Presentation to the Welfare Organisations Committee Steering Group.

Comments Received

2.8 The Council received written comments from over 30 stakeholders.

2.9 In relation to the spatial strategy, there was support for the focus of investment to be in the City Centre and in areas in need of regeneration. There were, however, conflicting responses regarding those areas that should be targeted for housing and employment growth; some argued that this should be more flexible to allow development to take place in other areas.

2.10 There was also much support for inclusion of a city-wide urban design policy to create attractive environments, to “design out crime” and to improve the health of residents. There was also support for setting standards for the amount of open space in an area, and improving quality in deficiency areas.

2.11 Government Office for the North West had a number of largely methodological/procedural concerns regarding the nature and content of the Paper:
- Need to show how the evidence has helped to identify the issues and options;
- Presentation of the options could be improved;
- There should be more discussion and background provided to allow for a more informed response;
- Need explanation as to what a Core Strategy is, its role and its links with the Regional Spatial Strategy;
- It should be more locally distinctive;
- It should be more spatial – it needs to show the implication of options for different parts of the City, and how different areas will develop as a result.

**How comments have been addressed**

2.12 To provide spatial clarity and in so doing address the criticisms of methodology, the Preferred Options Report was structured differently from the Issues and Options Paper. A number of the issues and their associated alternative options that were originally presented were merged, resulting in the development of composite Preferred Options.

2.13 In a small number of instances it was also considered to be inappropriate to develop a Preferred Option for a particular issue, because to do so would, for example, duplicate national or regional policy, or require a policy response which is insufficiently strategic in nature to be included in a Core Strategy.

2.14 As well as the inclusion of a smaller number of Preferred Options, the Report included three sub-area options for the City Centre, Inner Areas and Outer Areas respectively, which set out how the other Preferred Options would impact on these areas; this made the document more spatial.

2.15 The need to address the City’s regeneration needs and priorities drove the spatial strategy and was supported by the comments received at Issues and Options stage. The Preferred Options Report gave effect to this by focusing major new development and associated infrastructure in the City Centre and the Inner Areas.

2.16 The Preferred Options Report also included a ‘Spatial Portrait’ which set out the issues facing the City, gave brief details of evidence base studies, and included
hyperlinks to those documents. This made the Core Strategy more locally distinctive, provided context, and made the document easier to read.
3. **Preferred Options Consultation (Regulation 26³)**  
**March – May 2008**

3.1 The second formal stage of consultation took place between 28 March and 9 May 2008, built on earlier consultation and detailed the options that the Council intended to take forward in the final Core Strategy document. This document was structured differently to show more clearly the implications of options for different areas of the city and the way in which places will develop as a result, i.e. to make it more spatial (see paragraphs 2.12 – 2.16).

**Statutory Requirement**

3.2 Regulation 26 (of the 2004 Act) states that the Council must make copies of the pre-submission proposals’ documents, and a statement of the proposals’ matters, available for inspection during normal office hours; publish on their website the consultation documents; send the documents to the DPD bodies; and advertise the consultation in the local press.

**Statement of Community Involvement (SCI) Requirement**

3.3 The SCI requires that, following formal approval by the City Council, a Preferred Options Report is published for a 6 week consultation stage. At this stage there is also an opportunity to comment formally on the Sustainability Appraisal process in parallel to the plan itself. After the 6 week consultation stage has ended, the City Council considers, and where relevant incorporates, comments into the document being prepared for submission. All the comments can be read on the LCC consultation portal at [http://liverpool-consult.limehouse.co.uk/portal](http://liverpool-consult.limehouse.co.uk/portal).

**Who was consulted?**

3.4 The individuals and organisations listed in Appendix 1 were notified of the consultation periods during the preparation of the Core Strategy, and have been invited to submit comments.

**Methods Used to Consult**

3.5 In addition to the statutory requirements of the SCI as outlined above, a number of methods were used to consult statutory bodies, delivery partners, local people, businesses, community groups, elected members and City Council officers.

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³ Town and Country Planning (Local Development) (England) Regulations 2004
3.6 The table below provides an overview of the types of consultation that were employed for the Preferred Options consultation.

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<th>Consultation Method</th>
<th>Summary</th>
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<tbody>
<tr>
<td>The provision of consultation documents at key locations during set consultation period</td>
<td>Copies of the Preferred Options Report were sent to all libraries and made available at Millennium House, from 28 March 2008.</td>
</tr>
<tr>
<td>Letters to statutory bodies (listed in Regulations)</td>
<td>118 covering letters and a copy of the Preferred Options were sent to statutory consultees on 28 March 2008. The same information was sent to the City Council’s 90 Elected Members at the same time.</td>
</tr>
<tr>
<td>Internet (website, email-shot) (<a href="http://www.liverpool.gov.uk/ldf">www.liverpool.gov.uk/ldf</a>)</td>
<td>All documentation was made available on the website from 28 March 2008.</td>
</tr>
<tr>
<td>Media (press and broadcasting)</td>
<td>A public notice was placed in the Liverpool Daily Post on 25 March 2008.</td>
</tr>
<tr>
<td>Letters and formal written consultation /questionnaire / community surveys</td>
<td>Letters advertising the start of the Issues and Options consultation were sent to 2,843 non-statutory stakeholders listed on the City Council’s LDF database on 28 March 2008.</td>
</tr>
<tr>
<td>Telephone</td>
<td>All consultation documents and publicity material encouraged people to get in touch via telephone on 0151 233 3021.</td>
</tr>
</tbody>
</table>
| Pre-consultation internal engagement | Comments were received from:  
  - LCC Highways  
  - LCC Transport  
  - LCC Parks and Environment  
  - North Liverpool/South Sefton Strategic Investment Framework – Implementation Planning Group  
  - Liverpool Land Development Company  
  - LCC Children’s Services  |
| Neighbourhood committees | A presentation was made to each of Liverpool’s ten Neighbourhood Committees during February, March and April 2008. |
| Consulting with Hard to Reach Groups (through LCVS) | 0-25 Open Meeting – 20.11.07  
Arts and Culture Network – Sept 07  
Black and Other Racial Minorities Network (Sept 07)  
Community Regeneration Forum – 10.09.07  
Environment Network Meeting – 04.09.07  
Faith Network – 05.09.07  
Housing Needs Assessment Focus Group BRM/BME – 28.02.08  |
| Focus groups / Workshops / Seminars | Your Community Matters Events:  
City and North – 18.07.07  
South Liverpool – 19.07.07  
South Central – 25.07.07  
Your Community, Your Neighbourhood, Your Say:  
South Central – 19.11.07  |
### Comments Received

#### 3.7
The Council received approximately 470 separate written comments from over 60 organisations and individuals. Comments were also received from those who attended consultation events. All the comments can be read on the LCC consultation portal at [http://liverpool-consult.limehouse.co.uk/portal](http://liverpool-consult.limehouse.co.uk/portal).

#### 3.8
There was much support for the principle of focusing investment in the parts of the Inner Areas needing regeneration, especially North Liverpool, and for priority to be given to the redevelopment of previously developed land ahead of greenfield land and open space. However, there was concern that such an approach should not become overly focused on the City Centre and the Inner Areas, and should give due recognition to the regeneration needs of other parts of the City, particularly in the Regeneration Fringe areas. There was support for the principle that the Strategic Investment Areas should be protected for employment activities, and that there should be a continued focus of economic investment into them.

#### 3.9
Government Office for the North West again had some concerns regarding the presentation of the content of the document. They felt that:

- The report needed to be more explicit about how evidence has been used to identify options;
- The Sustainability Appraisal should be used better to develop options;
- The Core Strategy should show how it will add value to others’ plans and strategies;
- Alternative options need to be deliverable; and
• Information on deliverability will be required at the next stage: what will be delivered, where it will be delivered, when it will be delivered, and how it will be delivered.

3.10 Other comments included:
• The need to set out the infrastructure requirements for delivering the Core Strategy.
• The Plan needs to have better integration with the plans, strategies and projects of neighbouring authorities, and how these may affect the deliverability of Liverpool's plan.
• Health and climate change should be brought out in the Vision and Strategic Objectives.
• The Green Infrastructure element needs to be stronger.

How Comments Have Been Addressed
3.11 There were a number of comments which, if properly addressed, would constitute a change of direction for the way the Core Strategy was presented - particularly those comments from Government Office on the limited identification of viable alternative options. In addition, in June 2008, significant revisions were made to the plan-making process by Government. Of particular relevance was a new emphasis on setting out first a delivery strategy, arising from the Vision and Objectives, which had in turn been informed by an evidence base, rather than setting out a series of separate policy options as the City Council had previously done. Added to this, a new Regional Spatial Strategy (RSS) for the North West was adopted in September 2008. The new RSS increased the housing requirement for the City from 1110 homes per year to 1950, and set out new policies for Liverpool City Centre and its surrounding Inner Areas. In view of all these matters, it was concluded that it was necessary to prepare and consult on a revised set of preferred options before progressing to Publication of the Submission Draft stage.

3.12 The Revised Preferred Options Report concentrates on the key choices for the location of land for new homes and employment purposes. It identifies a clear ‘preferred’ overall “delivery strategy“, selected from three reasonable alternatives, each capable of achieving the vision and objectives of the Plan.

3.13 In order to take forward the approach of consulting on a number of “alternative delivery strategy options”, the City Council re-examined the distribution of new
housing, and, in the three delivery strategy options, introduced varying amounts of housing within the spatial sub-areas of the City. This was informed by the draft Strategic Housing Land Availability Assessment, and enabled the Council to address concerns regarding the inflexibility of the single preferred delivery strategy from Preferred Options stage.

3.14 The Revised Preferred Options Report set out known infrastructure projects, including those associated with the delivery of the Core Strategy. An Infrastructure Delivery Plan will be available when the Core Strategy is submitted for independent examination. The Core Strategy also sets out the indicative means of delivery and stakeholder responsibilities for implementing policies under each Strategic Objective.
4. Revised Preferred Options Consultation (Regulation 25\textsuperscript{4})

February – March 2010

4.1 The third stage of consultation took place between 1 February and 15 March 2010. After consultation on the initial Preferred Options Report, the Council felt it did not present a clear set of “reasonable alternative delivery strategy options” from which to choose (see paragraphs 3.7 – 3.14). Therefore, it was considered necessary to prepare a Revised Preferred Options Report which presented alternative options on the key choices for the location of land for new homes and employment purposes. The Report identified a clear overall delivery strategy selected from three equally well-defined and reasonable alternatives, all of which were capable of achieving the vision and objectives of the Plan, whilst also building upon the key findings from earlier consultation exercises.

Statutory Requirement

4.2 Regulation 25 (2008 Regulations) states that the Council must notify and invite comments from the statutory and general bodies, local residents and businesses, and make arrangements as appropriate to invite representations from local stakeholders.

Statement of Community Involvement (SCI) Requirement

4.3 The SCI describes that following formal approval by the City Council, a Preferred Options Report is published for a 6 week consultation stage. At this stage there is also an opportunity to comment formally on the Sustainability Appraisal process in parallel to the plan itself. After the 6 week consultation stage has ended the City Council considers, and where relevant incorporate comments into the document being prepared for submission. All the comments can be read on the LCC consultation portal at http://liverpool-consult.limehouse.co.uk/portal.

Who was consulted?

4.4 The individuals and organisations listed in Appendix 1 have been notified of the consultation periods during the preparation of the Core Strategy, and have been invited to submit comments.

Methods Used to Consult

4.5 In addition to the statutory requirements of the SCI as outlined above, a number of methods were used to consult statutory bodies, delivery partners, local people, businesses, community groups, elected members and City Council officers.

4.6 The table below provides an overview of the types of consultation that were employed for the Revised Preferred Options consultation.

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<tbody>
<tr>
<td>The provision of consultation documents at key locations during set consultation period</td>
<td>Copies of the Revised Preferred Options Report were sent to all libraries and made available at Millennium House, from 1 February 2010.</td>
</tr>
<tr>
<td>Letters to statutory bodies (listed in Regulations)</td>
<td>118 covering letters and a copy of the Revised Preferred Options Report were sent to statutory consultees on 1 February 2010. The same information was sent to the City Council’s 90 Elected Members at the same time.</td>
</tr>
<tr>
<td>Internet (website, email-shot) (<a href="http://www.liverpool.gov.uk/ldf">www.liverpool.gov.uk/ldf</a>)</td>
<td>All documentation was made available on the website from 1 February 2010.</td>
</tr>
<tr>
<td>Media (press and broadcasting)</td>
<td>A half-page colour advert was placed in the Liverpool Echo on 1 February 2010. A press release was also issued, and articles appeared in Place North West daily email on 8 March highlighting that the consultation period was coming to an end. Articles were also placed on the websites of Liverpool First, Liverpool Community Network and the Council’s Intranet and Internet.</td>
</tr>
<tr>
<td>Leaflets</td>
<td>A poster was sent to all One Stop Shops and Libraries, and taken to all consultation events and meetings with partners, along with explanatory leaflets and information of dates and times of the drop-in sessions.</td>
</tr>
<tr>
<td>Letters and formal written consultation /questionnaire /community surveys</td>
<td>Letters advertising the start of the Issues and Options consultation were sent to 3,048 non-statutory stakeholders listed on the City Council’s LDF database on 1 February 2010. Questionnaires were also prepared and handed out along with the leaflets at Libraries and One Stop Shops.</td>
</tr>
<tr>
<td>Public exhibitions</td>
<td>22 drop-in sessions were arranged across the city at libraries and One Stop Shops. Officers were present at all of the sessions with the exception of those at Millennium House, where Planning Service officers were available to answer queries from the general public.</td>
</tr>
<tr>
<td>Telephone</td>
<td>All consultation documents and publicity material encouraged people to get in touch via telephone on 0151 233 3021.</td>
</tr>
</tbody>
</table>
| One-to-one meetings with stakeholders | These were offered on an ad-hoc basis to interested parties. In addition, specific face-to-face meetings were held with a number of key delivery partners, including:  
- Other City Council departments  
- Ward Councillors when requested  
- Public sector delivery partners (e.g. Merseytravel, Liverpool Vision, NWRDA, GO-NW,)  
- Other key delivery partners, including Peel Holdings and the universities.  
- Business community including two briefings for Chamber of Commerce – 28.01.10 and 24.02.10 |
| District Committees (These replaced the Neighbourhood committees in 2009) | South Central District Committee on 9th February 2010  
South Liverpool District Committee 16th February 2010  
Alt Valley District Committee 22nd February 2010  
Liverpool East District Committee 24th February 2010  
The Economic Development and Enterprise Neighbourhood Partnership Working Group (Alt Valley Neighbourhood Committee) – attended meetings on 12.04.10 and 15.11.10. |
| Consulting with Hard to Reach Groups (through LCVS) | Information concerning the Revised Preferred Options consultation was circulated via Liverpool Charity and Voluntary Services. |
| Focus groups / Workshops / Seminars / | Local Transport Plan/Local Development Framework Liaison Group – 9th March 2010  
CAEB - Core Strategy Regional Workshop 19th May 2010  
Liverpool Core Strategy Sub-regional Workshop (with all neighbouring districts) 19th April 2010. |
| Elected Member Liaison | **Executive Board (04.01.10)** - The document was presented to the Executive Board to seek approval to undertake public consultation on the document.  
Regeneration and Environment Select Committee 11th February 2010  
Housing Select Committee 15th June 2010 |
4.7 **Comments Received**

The Council’s stated preferred delivery strategy option was supported by the majority of respondents. Benefits identified by respondents include those stating that the preferred option:

- offers, the best overall balance for accommodating housing across the City, more housing in the Regeneration Fringes, including family housing which will be important to regenerating these areas,
- offers the greatest flexibility in the distribution of housing, is less reliant on high density housing in the City Centre and surrounding Urban Core, and gives greater certainty of social and environmental improvements in the Regeneration Fringes,
- Provides the best balance between preserving employment land and enhancing the city’s housing offer,
- Is the most realistic option to deliver health and wellbeing needs and is most closely aligned with the Sustainable Community Strategy,

4.8 However, there were concerns that a more sustainable option would be to locate development in the Urban Core and City Centre, because this would utilise the most sustainable locations and existing infrastructure and transport.

4.9 The economic recession has, however cast doubt on the deliverability of brownfield housing sites especially in the Urban Core and City Centre: while there were no responses in support of Option Three, there were calls to release land, including some greenfield and currently designated employment sites, earlier than indicated, in the Suburban Areas, to enable sufficient housing development of the right kind to be achieved. There were also concerns that the strategy for new housing should be more flexible to enable this to be delivered outside of the Regeneration Fringes but still within the Suburban Areas more generally, as a means of aiding regeneration and to help meet objectives of increasing the proportion of higher value properties.

4.10 There was some concern regarding the inflexibility of permitted uses within the SIAs, and some respondents felt that uses other than Class B (B1/B2/B8) should be allowed within the SIAs to provide a supporting role to employment uses, and to encourage regeneration. In addition, it was felt that the growth sectors promoted in the Core Strategy did not accurately reflect the city’s own strengths. Significant omissions were seen to be maritime, culture and arts, airport-related uses and the football clubs.
4.11 There were objections regarding the restriction of further retail development in out-of-centre locations, and argument that a “blanket ban” is not in line with PPS4. There were objections related to the positive approach expressed for Edge Lane Retail Park and Stonedale Crescent Shopping Park, and the negative approach for New Mersey Shopping Park, arguing that these have not been justified by an up-to-date evidence base.

4.12 There were also objections to changes in the Local and District Centre hierarchy, as a number of centres have been moved down the hierarchy. Objectors argue that these centres continue to meet the criteria for their existing designation and are of significant value to the local communities and regeneration programmes.

4.13 In addition, the inclusion of Stonebridge Cross as a Local Centre in the hierarchy was requested, as the heart of a major new community-led leisure and residential development project.

4.14 There was support for policies that seek to avoid, reduce or mitigate negative environmental impacts but there was concern among developers that the policies were not flexible enough, and that requirements for development to meet the Code for Sustainable Homes, BREEAM and on-site energy generation should be implemented on a site-by-site basis, to take viability into account.

4.15 Given the role of the Liverpool Waters scheme in achieving the delivery of the City’s housing requirement, and also other supporting uses on the site, there were a number of comments regarding its impact on the city. The scale and type of retail on the site - given its close proximity to the City Centre - was a concern to some, and it was felt that this development should in no way undermine the role and function of the Regional Centre. In addition, clarification was sought on how the Council would avoid damage to the commercial area of the City Centre as the proposals include office uses. Given the site’s location within the World Heritage Site and Buffer Zone, there were a number of comments concerned with the impact on the WHS and its Outstanding Universal Value.

**How Comments Have Been Addressed**

4.16 Whilst it is recognised that market conditions pose some risk to delivery in the early phases of the Core Strategy, it is considered that there is adequate scope for
residential development opportunities to come forward in the period to 2028. The housing trajectory proposes an increasing level of housing delivery over the Core Strategy period. In the context of the regeneration needs of the Urban Core and the fact that the level of delivery in the next five years in the Suburban Areas is expected to average nearly 500 dwellings net, it is not considered necessary to release sites in the Suburban Areas more rapidly.

4.17 The main changes to the housing policies with regards to the location and phasing of new housing, mainly arise as a result of the changing status of the RSS. The rate of housing growth is now expected to increase steadily up to 2023 before falling back slightly to 2028. It is considered that this better reflects the way in which housing growth is likely to be achieved in the city over time, the new realities of the housing market and the likelihood that the recovery will be over a longer term.

4.18 In terms of economic development, some flexibility has been introduced into policy to allow consideration of its use for non-B1/B2/B8 uses. Whilst this is in the interests of economic regeneration and job creation, all development proposals will be subject to other relevant planning policy, including that relating to Local and District Centres. The growth sectors identified have been adjusted to take better account of Liverpool’s own economic strengths, rather than directly adopting the regional priorities of the RSS: in particular, the importance of the visitor economy (including heritage and cultural assets) has been underlined.

4.19 Whilst there were strongly-expressed objections with regards to the out-of-centre retail parks, the policies continue to support enhanced facilities at Edge Lane due to qualitative and quantitative needs, but do not support further retail facilities at New Mersey. Whilst its existing role and function is recognised, extensive investment within the shopping park in recent years means that it is now at capacity, and further growth is considered detrimental to surrounding centres. Policies have now been informed by a recently completed PPS4 Study undertaken by consultants commissioned by the Council, to review the future retail and commercial leisure needs of the Council’s administrative area up to 2026, and to understand how existing facilities serve residents and what potential there is to plan for any additional facilities over the study period.

4.20 In terms of the position of centres within the hierarchy, with the exception of Stonebridge Cross, the hierarchy set out in the Preferred Options Report has been
carried forward unchanged on the basis of evidence. It is considered that this will not preclude future investment within those centres which have moved down or out of the hierarchy. Stonebridge Cross has now been included within the Suburban Areas policy as a Local Centre to reflect plans for the area, and to recognise that facilities will be needed to support an increased population.

4.21 With regards to policies to maximise sustainable growth and reduce negative environmental impacts, there has been no change to the overall approach. In terms of pursuing the Code for Sustainable Homes and BREEAM, evidence does suggest that Level 3 can now be achieved, subject to other matters of development economics and site viability.

4.22 Not all issues raised in the consultation responses could be addressed effectively by making amendments within the proposed policy approaches. In some cases it was also helpful to change the order of the policies within each section, or to move elements of policies from one to another or to create new policy areas. The primary examples are the introduction of a new policy setting out the sustainable development principles that apply to the whole of the Core Strategy and across Liverpool (Strategic Policy 1) and in response to emerging corporate priorities the creation of a new Strategic Objective and an associated policy (Strategic Policy 35, in relation to social inclusion and equal opportunities.
5. Submission Draft Consultation: *(yet to be undertaken)*

**NB:** In the earlier stages of preparation of the Core Strategy, the spatial sub-areas of Liverpool are referred to by the names adopted at the Preferred Options Stage: City Centre, Inner Areas and Outer Areas. From the Publication Stage onwards, these areas (with identical boundaries), are referred to as City Centre, Urban Core and Suburban Areas.
Appendix 1. List of Individuals and Organisations Consulted During Plan Preparation

**Business/Consultants**

2020 Liverpool
A&W Renshaws Newsagents
Accent Group
Addleshaw Goddard
Adshead & Larkhill Residents Association
Adullam Homes Housing
Alan Baxter & Associates
Alan Burke Consulting
Albany Assets
Albert Dock Company
Aldi Stores Limited
Alliance
Alphagraphics
Aluko Brooks Architects
Amec
Andrew R Williams & Associates
Andrew Vaughan
Anthony Goss Planning
Antler Homes North West Plc
Arawak Walton HA Limited
ARC
Arena Housing Association Ltd
ARRIVA North West Ltd
ARUP
Associated British Ports
B.N.E.N.C
Bank of England Agency
BANKS - Development Division
Bardsley Dyson
Bargain Booze
Barratt Chester
Barton Willmore
BDP Planning
Beazer Partnership Homes
Beechcroft Developments
Beetham Organization Limited
Berwin Leighton
Bett Homes (Northern) Ltd
Bigmore Olsen Bennett Chartered Architects
Bissell, Ivan Architect
Bovis Homes Limited
Boyer Planning
Brabner Holden
Braidwater Limited
Bridgewater Meeting Room Trust
Briery Homes Limited
Broadway Malyan Planning
Bruntwood
Buchanan Consulting Engineers
Burnett Planning & Development Limited
Business Development Associates
Business Environment Planning
Business Liverpool
C & HT Developments
CAG Consultants
CAMRA
Cavern Walks Ltd
CB Hillier Parker
CB Richard Ellis
CBI
CDS Housing
Centre for Ecology and Hydrology
(Lancaster)
Charlesworthy Group Limited
Chatsworth & Overbury
Chelford Homes
Cheshire & Merseyside Workforce
Development Confederation
Christian Alliance Housing Association
Christopher Rodgers
Christopher Rogers Associates
Citescapes Ltd
City & Wharf
Cliff Walsingham & Company
Cloudeslee
CNC Property Management Limited
Colliers CRE
Collingwood Housing Association
Commercial Estates Group
Comprehensive Design Architects
Co-operative Development Services
Corporate Real Estate
Cosmopolitan Housing Association
COTTEE Transport Planning
Country Land and Business Association
Countryside Properties - Residential North West Ltd
CPR Consultants
Crosby Homes (NW) Ltd
Cruden Construction Ltd
Darmight Projects Limited
David L. Walker Chartered Surveyors
David Lock Associates
David McLean Homes Limited
David Wilson Homes North West
Dawn Developments Limited
DCMS
De Pol Associates
Derek Hicks & Thew Partnership
Halsall Lloyd Partnership
Hardys & Hansons
Harris Lamb
Heyes Direct
Hillcrest Homes Limited
Hitchcock Wright and Partners
Home Office (I.N.D.)
Hornby Homes
HOW Commercial Planning Advisers
Howard Johnson Serviced Apartments
Hyder Consulting Ltd
ICOMOS-UK
Iliad
Indian Delight Restaurant, 83 Renshaw Street
Indigo Planning Limited
Integrated Building Management
Invest In Liverpool
J D Wetherspoon Plc
J10 Planning
Jacobs Bakery Limited
Jacobs Newsagent
Jarvis (c/o Network Rail)
John Mackenzie
John Rose Associates
John West Foods
Jones Day
Jones Lang LaSalle
Keegan, Paul Associates
Kent Jones and Done
Kexgill (Liverpool) Ltd
Kier North West - Construction Company
King Sturge
King Sturge LLP
KKA
Knight Frank
KPMG
LaFarge Aggregates Ltd
Lagan Developments
Laing Homes Ltd
Land Projects UK Associates
Landmark Information Group
LCCI Planning and Strategy Committee
Learning Resources
Littlewoods
Liverpool Chamber of Commerce
Liverpool Echo
Liverpool Everyman & Playhouse
Liverpool Financial Solution
Liverpool First
Liverpool Housing Action Trust
Liverpool Housing Trust
Liverpool John Lennon Airport
Liverpool John Moores University
Regional Housing Board
Restoration Design Partnership
Richcliff (Group) Ltd
Richmond Fellowship
Riverside Housing
Riverside Housing Association
Robert Turley Associates Ltd
Rodney Housing Association Ltd
Roger Tym & Partners Ltd
Roscoes Bar
Ross Associates
Royal & Sun Alliance
Royal Bank of Scotland
RPS Group Ltd
RSK Environments Ltd
Rumford Investments
S J Berwin LLP
Safer Merseyside Partnership
Samrat Tandoori
Savills
Scott Wilson Resource Consultants
Seddon Homes Limited
Servite Houses
SGP Property Services Ltd
Shepherd Developments
Sheppard Robinson
Simon Artiss
SLR Consulting Limited
South Liverpool Environment Network
South Liverpool Housing
St Domingo Properties
St Vincents HA Ltd
St. Modwen Properties Plc
Steer Davies Gleave
Steve Biko Housing Association
Steven Abbott Associates
Stewart Ross Associates
Storey Sons & Parker
Streamgold Properties Limited
Strutt & Parker
Studio Egret West
Taylor Woodrow Developments Ltd
Ted Clement Evans
Telewest Communications
Terence O'Rourke Ltd
Tesco Stores Limited
The Ideal Bakery
The Mersey Forest

The Paul Drury Partnership
The Planning Bureau
The Roscoe Head
The Stadium Group
Thistle Hotel
Thompson, Carl Associates
Thornburn & Co
Tic Consultants
Town Planning Consultancy
Transpennine Express
Triad Planning & Design Ltd
Trinity Mirror North West
Tuebrook Hope Group
Turner Morum
Tushingham Moore Chartered Surveyors
UK Land & Property
Uni Indian Restaurant
Unisys
United Co-operatives Ltd
United Utilities Plc
University of Liverpool
Urban Splash
Venmore Thomas & Jones
Venture Housing Association
Vincent and Gorbing
Virgin Trains
Vodafone Limited
Wain Homes (North West Ltd)
Wainhomes (Northern) Ltd
Walton Group
Ward Design
Weightman and Bullen Ltd
Westbury Homes (Holdings) Ltd
White Young Green
Wilbraham & Co
William Bell and Company Services Limited
Williams Michael Architect
Wilson Connolly (Lancashire)
Wimpey Homes Holdings Ltd
Woodford Land Limited
Woodward Ltd K & J
Young, Brian & Associates
Zorba’s Restaurant
Seddon Group Chairman
Sayers Confectioners Ltd

Councillors & MPs
Councillor Karen Afford
Councillor Elaine Allen
Councillor Peter Allen
Councillor Joe Anderson
Councillor Dave Antrobus
Councillor Rose Bailey
Councillor Louise Baldock
Councillor Violet Bebb
Councillor Giedon Ben-Tovim
Councillor Vera Best
Councillor Warren Bradley
Councillor Paul Brant
Councillor Linda-Jane Buclek
Councillor Paul Clark
Councillor Pamela Clein
Councillor Eddie Clein
Councillor Paul Clein
Councillor Jan Clein
Councillor Flo Clucas
Councillor John Clucas
Councillor Barbara Collinge
Councillor Frank Cooke
Councillor Jane Corbett
Councillor John Coyne
Councillor Alan Dean
Councillor Frank Doran
Councillor Colin Eldridge
Councillor Marilyn Fielding
Councillor Kevin Firth
Councillor Beatrice Fraenkel
Councillor Roz Gladden
Councillor Tina Gould
Councillor Ron Gould
Councillor Dave Hanratty
Councillor Joe Hanson
Councillor Ann Hines
Councillor Pat Holleran
Councillor Steve Hurst
Councillor Dave Irving
Councillor Ian Jobling
Councillor Roger Johnston
Councillor Sir Trevor Jones
Councillor Malcolm Kelly
Councillor Richard Kemp
Councillor Erica Kemp
Councillor Jimmy Kendrick
Councillor Malcolm Kennedy
Councillor Janet Kent
Councillor Doreen Knight
Councillor Chris Lenton
Councillor Barbara Mace
Councillor Andrew Makinson
Councillor Tom Marshall
Councillor John McIntosh
Councillor Peter Millea
Councillor Norman Mills
Councillor Phil Moffatt
Councillor Stuart Monkcom
Councillor Josie Mullen
Councillor Steve Munby
Councillor Barbara Ann Murray
Councillor Ann O’Byrne
Councillor Richard Oglethorpe
Councillor Bob Ousby
Councillor Frank Prendergast
Councillor Robbie Quinn
Councillor Mary Rasmussen
Councillor Steve Radford
Councillor Irene Rainey
Councillor Steve Rotheram
Councillor Anna Rothery
Councillor Jean Seddon
Councillor Laurence Sidorczuk
Councillor Wendy Simon
Councillor Nick Small
Councillor Jack Spriggs
Councillor Nadia Stewart
Councillor Mike Storey CBE
Councillor Colin Strickland
Councillor Sharon Sullivan
Councillor Andrew Tremarco
Councillor Berni Turner
Councillor Keith Turner
Councillor Paul Twigger
Councillor Alan Walker
Councillor Pauline Walton
Councillor Ritchie White
Councillor Hazel Williams
Councillor Ben Williams
Rt Hon Ben Chapman M.P.
Rt Hon Louise Ellman MP
Rt Hon Ms Jane Kennedy MP
Rt Hon Peter Kilfoyle MP
Rt Hon Bob Wareing MP

General Public and Community Groups

40 & 44 Pall Mall Residents Association
A Wooding
Abbayfield Society - North West Region
Acorn Court Residents
Adam Donovan
Adam Holmes Association
Adlam Park T & R Association
AGAR Residents Association
Age Concern England
Alasdair Macdonald
Albert Dock Residents
Alexander Cardew
Alison Ball
Allerton Residents Association
Anchorage Residents Association
James and Julie Hooper
James Gabriel
Jamie McDonald
Jean Hill
Joan Gardner
Joanna Hargreaves
John & Rosemary Bennett
John F Kennedy Heights Tenants Association
John Jay
John Lambert
John McDermott
John McGrath
Johnny Johnson Housing Trust
Joint Committee of National Amenity Societies
Jubilee Drive Residents Association
Jubilee Residents Association
Judith Cooke
Julie Gibson/Bob Braddock
Julie Wale
K S Patterson
Karen Vernon
Kathleen J Roberts
Kay Kelly
Kensington Fields Community Centre
Kensington Fields Community Council
Kensington Fields Residents Association
Kingsheath & District Residents Association
Kirkdale Community Centre
Kirkdale Neighbourhood Community Council
Knotty Ash Community Centre
Knotty Ash West Derby Residents Association
Kurdish / Turkish Community
L W Gabriel
L1 Partnership
Langrove Community Housing Co-operative
Lark Lane & District Traders Association
Laura Collins
Lawrence and Picton CA
LCVS/Liverpool Community Network Steering Group
Leonard Cheshire
Lesley Worrall
Leta Claudia Streets Housing Co-operative
Littman & Robeson
Liverpool & District Association of Women's Clubs
Liverpool 1 Focus
Liverpool 8 Law Centre
Liverpool Association of Disabled People
Liverpool Astronomical Society
Liverpool Biennial of Contemporary Art
Liverpool Business Associations
Liverpool Chinatown Business Association
Liverpool Community Environment Network
Liverpool Community Spirit
Liverpool Council for Voluntary Service
Liverpool Daily Post and Echo
Liverpool East Area Committee
Liverpool Film Office
Liverpool Football Club
Liverpool Hackney Drivers Association
Liverpool Housing Action Trust
Liverpool Jewish Housing Association
Liverpool Mencap
Liverpool Parish Church
Liverpool Rope Walks
Liverpool Six Community Association
Liverpool Spastic Fellowship
Liverpool Student Homes
Liverpool Taxi Drivers - Fleet Owners
Liverpool Taxi Drivers - Hackney Owners
Liverpool Urban Design & Conservation Areas Panel
Liverpool Vision Community Engagement Panel
Liverpool Voluntary Society for the Blind
Liverpool YMCA
Lodge Lane East Residents Association
Lodge Lane Regeneration Group
Louise Jordon
Lowfield & Radmore Tenants Association
Lucy Page & Bryan Scott
M.W.R.R.C.
MacQueen Street Residents Association
Margaret Todd
Maritime Housing Association
Mark Steward
Mark Street Residents Association
Markets Manager
Martin Robinson
Mary Oliver
Mason St Highgate Tenants Association
Maureen McCarthy
Menzies Residents Assoc
Merseyside Centre for Deaf People
Merseyside Council of Faiths
Merseyside Cycle Campaign
Merseyside Cycling Campaign
Merseyside Disability Federation
Merseyside Environmental Trust
Merseyside Industrial Heritage Society
Merseyside Jewish Community Care
Merseytravel Womens Forum
Merseyside Pensioners Association &
Merseyside Somali Centre
Merseyside Playing Fields Association
Merseyside Yemeni Community Association
Mill Street Housing Co-operative Limited
Millennium Walks Committee
Minster Court Residents
Miss Christina Clarke
Miss J A Rogan
Miss L Johnson
Miss Pamela Leadbeater
Miss V McNeil
Misses M M & B A Taylor
Molyneux Residents Association
Morningside & Area HWRA
Mount Street Residents
Mr & Mrs A D Wilson
Mr & Mrs F Edwards
Mr & Mrs G H Low
Mr & Mrs Langton
Mr & Mrs O'Maly
Mr A Hawkins
Mr A Taylor
Mr A Travis
Mr Brian Aston
Mr Brian Hurst
Mr C Dobbin
Mr C Morris
Mr D E Barnett
Mr D Howaston
Mr D M Phillips
Mr D Wright
Mr Dave Owen
Mr F.W. Cummerson
Mr G Gregson
Mr Gabriel Muies
Mr George C Mclver
Mr H Jennings
Mr J G V Landsberg
Mr J J Armstrong
Mr J J Carson
Mr J Lee
Mr James Hall
Mr Jim Horne
Mr K H Evans
Mr Ken Pye
Mr L Davidson
Mr Lawrence Fletcher
Mr M Anwar
Mr M Wotton
Mr P Owens
Mr P T Woodward
Mr R Kelly
Mr S Byrne
Mr Uka
Mr W Rowe
Mr. Brian Scott
Mrs A McGing
Mrs A Johnson
Mrs Anne Gorton
Mrs C A Mansell
Mrs Christine Oakes
Mrs Debbie Buck
Mrs E A Jones
Mrs E Armstrong
Mrs E Fearon
Mrs E H Thomas
Mrs Emily Powell
Mrs G Leather
Mrs Glynn
Mrs I Hughes
Mrs I Mackenzie
Mrs J Daniels
Mrs J Hynes
Mrs Jean Price
Mrs Kathleen Linehan
Mrs L Montgomery
Mrs M E Rutherford
Mrs M Wright
Mrs Marie Till
Mrs N Dunbar
Mrs N Williams
Mrs P J Henley-Smith
Mrs Patricia Lacey
Mrs Patricia Taylor
Mrs Rosemary Doman
Mrs S Thompson
Mrs Sylvia Jeffrey
Mrs V Cooper
Ms C. Szalcer
Ms J E Wilson
Ms J McGrath
Ms Julie Wenton-Perry
Ms Marlene Taylor
Ms Mo Woo
Ms P Tyler
Ms Pamela Thomas
Ms. Janette Porter
M'Side & W. Cheshire Area Ramblers
Association
N Harrison
N Woods
N.A.S Association
NABPALS Residents
Navigation Wharf Residents
Needham Residents Association
Netherley Residents Association
Netherley/Valley Partnership
Netley/Bradwell Community Assoc
Neville Bann
New Cantril Farm Tenants & Residents Association
Newsham Park Residents Association
Nick Blackstaff
Nicky Owen
Norris Green Crescent T/R Assoc
North & Central Area Committee
North Liverpool Regeneration Company
North West Disability Arts Forum
NOVAS Group
Oakfield Community Union
Old Cantril Farm T&R Association
Orrell Park Residents Association / Orrell Park Regeneration Group
Pakistan Centre
PAMP Tenants/Residents Association
Park Lane Pensioners
Parklands Residents Association
Patrick Davies
Paul Burns
Paul Eaton
Paul Gilroy
Paul Hide
Paul Sankey
Paul Sawko
Paul Slater
Penny Lane Development Trust
Penrhyn Street/Wilbraham Street, Residents Assoc
Peter Bradley
Peter Corbett
Peter Davidson
Peter Hacillo
Peter Wallace
Peter Woods
PETRA
Philip Inch
Philip N Jones
Phillip Mottram
Phythian Estate Residents Association
Picton Progress
Pine Court Housing Association
Portland Place Tenants Association
Prince Albert Gardens Housing Co-op
Prince Uka U. Uko
Princes Park Residents Association
Prof. David Dunster
Queens Court Housing Co-operative
Quickswood Green Residents Association
Quorn Street Residents Assoc
R H Parry
R Metta
R R Evans
Radio City Ltd
Radio Merseyside
Rev John Short
Rice Lane Community Association
Richard Kelly Daneville T&R Association
Ring E.M.B
Rita Atkinson
Riverside Action Group
Riverside Action Group Residents Association
Robin Riley
Rod Wilson
Rodney Dykes Housing
Roman Catholic Archbishop
Ron Denton
S E Garner
S.A. Munro
Salisbury Gardens Management Committee
Salvation Army Housing Association
Sarah Cowie
Save Open Spaces
Save Our City Campaign
Scarisbrick Area T & R Association
Sepp Fryer
Shelter
Shirley Smith
Shorefields Housing Co-operative Limited
Shorefields Residents Association
Simon Bell
SLH Garston Area Consultative Committee
Somali Umbrella Group
Somali Women's Group
Southern Neighbourhood Council
Southwood/Alpass/St. Michaels Residents Association
Speak Action Group
Speak Garston Tenants Group
St Domingo Community Association
St Josephs Tenants Association
St Lawrence Quay Residents Association
St Nathaniel and The Dale Roads Community Forum
St. Michaels/Lark Lane Community Association
Stalisfield Flats Tenants Association
Stanfield Residents Association
Stanley & District Residents Association
Stanley Park Preservation Society
Stephen Chipp
Stephen Moran  
Steve Wood  
Steven Quinn  
Stoneycroft Residents Association  
Sudley Area Residents Association  
Sue Newton  
Susan Hanley  
Tavistock Tenants & Residents Association  
The Dingle Groves Residents Association  
The Federation of Liverpool Waterfront Residents Associations  
The Avenues Neighbourhood Network (TANN)  
The Hindu Centre  
The Living Arts Productions  
The Methodist Church  
The Occupier  
The Pagoda Chinese Community Centre  
The Rodney Street Association  
The Sikh Community Centre  
The Villages Housing Association  
The Weston Spirit  
Thirlmere Residents Association  
Thirlmere Tenants & Residents Association  
Thomas Corlett  
Thomas Martin  
Thomas O’Donnell  
Thornside Residents Association  
Tony Jennings  
Tony Murphy  
Top Community Centre  
Toxteth & Edge Hill Area Committee  
Toxteth Partnership  
Toye Ogisi  
Transport 2000 Merseyside  
Trevor Latham  
Triangle Residents Association  
Trispen and Petherick Action Group  
Tuebrook (Central) Resident's Association  
Tuebrook (South) Resident's Association  
Tuebrook Junior Sports League  
Tuffin Corner Residents Association  
Twiss Tenants Association  
Unite  
University of Liverpool  
University of Liverpool  
Urban Hope  
Vale Lodge Residents Association  
Vauxhall Neighbourhood Council  
Vensall Tenants Association  
Vestock Street and Green Street Residents Association  
Victor Basil  
Victorian Society  
Villagers and Traders Forum Woolton  
Wallasey Civic Society  
Walter Raughedge  
Walton Area Committee  
Walton Community Association  
Walton Park Residents Association  
Walton Triangular TARA  
Wandsworth Residents Association  
Wapping Residents Association  
Waterloo Warehouse (RTM) Co. Ltd  
Wavertree Society  
West Derby Society  
West Derby Village  
Residents/Tenants/Business Association  
West Everton Community Council  
West Everton People’s Project  
West Speke Area Consultative Committee  
West Speke Tenants Association  
Whitechapel Project  
Whitefield Community Council  
Whuppass Action Group  
Whuppass Residents Association  
William Henry Tenants Association  
Windermere Dovetail & Camelot Residents Association  
Window Lane Tenants Association  
Winskill Tenants/Residents Assoc  
Woodlands Residents Assoc  
Woodstock Street Tenants Assoc  
Woodstock/Westmoorland/Silvester Tenants  
Woolton Grove Residents Assoc  
Woolton Society  
Woolton Village Residents Association  
Wrekin College Geography Department  
Wrightson O'Brien Strategic Partnership  
Young Persons Advisory Service  
Yvonne Irving (Liverpool 14 Community Group)
Alt Valley Neighbourhood Management Area
Assistant Executive Director Policy & Programmes
Chris Walsh
Christine Wray
City Focus
Colin Hinton - Chief Executive
Education, Lifelong Learning & Leisure Executive Director Regeneration
Head of Equal Opportunities & Positive Action Training
LCC - Regeneration Initiatives
LCC - Regeneration Policy
LCC Children's Services - Executive Director
LCC City Centre Management Team
LCC Environmental Health

LCC Housing & Supported Living - AED
LCC Legal Services
LCC Leisure Services
LCC Leisure Services - Policy & Development Unit
LCC Resources - Executive Director
LCC Revenues and Benefits - AED
LCC Supported Living - Executive Director
LCC Treasury & Risk Management - AED
Liverpool Culture Company Ltd
Mr Jason Skeete
Neighbourhood Management South Central
Planning & Public Protection Manager
Property and Assett Management Service
Steve Culkin
Walton Neighbourhood Committee

Partner Organisations
Alt Valley Partnership
Business Liverpool
Central Liverpool Primary Care Trust
Chief Inspector Ian Liversage
City of Liverpool Community College
Community Regeneration Forum
Connexions
Design Liverpool
Future Hospitals Team
Kensington New Deal for Communities
Kensington Regeneration
Learning & Skills Council
Liverpool Health Authority
Liverpool Hope University
Liverpool John Moores University
Liverpool Land Development Company
Liverpool South PCT
Liverpool Vision
Merseyside LTP Support Unit
Merseyside Police
Merseyside Police Headquarters
Merseyside Probation Service
Merseytravel

Mott MacDonald MIS
NHS North West
Nick Hughes - Jet South Liverpool (SA Panel Member)
North Liverpool PCT
North Mersey Community (NHS) Trust
North Mersey Future Healthcare Project
Royal Liverpool Children's Hospital
South Central Cluster Partnership
South Liverpool Cluster Partnership
South Liverpool Housing
South Liverpool PCT
South Sefton Primary Care Trust
South Suburbs Neighbourhood Team
Speke Garston Development Company
Supported Employment Team
The Mersey Partnership
University of Liverpool
University of Liverpool - Dept of Civic Design
University of Liverpool - Dept. Archaeology
University of the West of England
Wirral MBC

Planning Agents
4 Seasons
A & P Building Services
A. C. Robinson & Associates
A. J. Cocker Associates
A. J. Design Ltd
A. La-Carte Interiors Ltd
A. Allister & Son
A. J. Breerton
A/W Design
AA Design Ltd
Abacus Design
ABB Engineering Services
Abby Builders
Abbeydale Landscapes
ABC Civil Engineering Services Ltd
ABF Design
Ace Signs
ACG Ltd
Acketts Group Ltd
Acorn Construction Ltd
Acorn Foundation Engineering Ltd
ACS Consulting
Actiform Ltd
Adam Design UK Ltd
Adam Sunderland
ADM Consultancy
Admiral Signs Ltd
Adrian Design & Surveying
ADS Consultants
Aedas Architects Ltd
AEW Architects & Designers Ltd
AFL Architects
Agency Services
Agency Services Central
AIG Consultants
Aigburth Building Services
Ainsdale Lofts
Ainsley Gommon Architects
Aintree Hospitals NHS Trust
Air Cool Engineering Midlands Ltd
Air Quality Monitoring Ltd
Aire Design
AK/A3
Alan Fearnhead Design
Alan Gayner
Alan Summers Architectural & Surveying
Albert Park Development Ltd
Alcaraz Interior Design
Alder Hey Hospital
Alex Halford
Alexon International
Allan B Matthews
Allan Hughes Building Services
Allen Construction
Allen Construction Management
Allenbuild North West
Allerton General Builders
Allerton Lofts
Allerton Windows
Allford Hall Monaghan Morris Architects
Allison Pike Partnership
Alpha Conservatories
Alphabet Design
Altway Construction
Alyn Nicholls & Associates
AM Laverty Builders
AM Systems UK
AMA
AMA Design
Amdega Ltd
Amie Tsang
Amy Building Services Ltd
Anchor Housing Action Trust
Andrew Design Service
Andrew Holmes
Andrew Louis Ltd.
Andrew Peers
Andrew Southward
Anglian Home Improvements
Anglian Windows Ltd
Ansell & Bailey
Anthony Grimshaw Associates
Anthony Keith Associates
Anthony Shipley Building Consultancy
APB Architect
Apex Lofts
APM Design
APT Marconi
Aquila Consultancy Services
Arandel Associates
Archer Architects
Architectural & Building Surveying Service
Architectural & Planning Services
Architectural Design
Architectural Design Service
Architectural Design Services
Architecture & Urbanism Group
Architectus
Archline Design Ltd
Arctech
Arden Design and Landscaping
Argyle Design Partnership
Arkheion Architects Ltd
Arlux Uk Ltd
Arriva Plc
Artis Projects Ltd
Artisan Conservatories
Artisan Services (NW) Ltd
Artz Architecture Ltd
Ashleigh Signs Ltd
Ashley Interiors
Associated Design Time Ltd
Astle Designs
Astley Signs
Atelier 2
Atelier 2 Architects
Atelier 2 Architects
Atelier TL Ltd
Atkins Architecture
Atkins Faithful & Gould
Atkinson Loller
Atkinson Peck Consulting Engineers
Atlas Management
Attica Lofts
Austin Associates
Austin Holmes Associates
Austin Smith Lord
Avon Construction
AWA Limited
Axiom Architects
B Bentham
B M Trevillion Interiors Ltd
B&G Partnership
B. D. P.
B. D. Rea
B.S. Architectural Services
Babtie Group
Bailey & Co Architects
Bailey & Neep
Banff Construction Ltd
Barden Planning Consultants
Bargin Booze Ltd
Barleycroft Ltd
Barnes Design
Barnett Ratcliffe Partnership
Barratt Manchester
Barrie Newcome Associates
Barry Grace Associates
Bartlett & Son
Bartlett Tree Experts
BCA Landscape
BDK Construction
BE Property Services
Bedford & Havenhand
Beechcourt Builders
Bell Associates
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Bellis Kennan Gribble & Co
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Bennett Associates Ltd
Benson Signs
Berkeley Construction Ltd
Bettabuild
Betts Associates
Bidwells
Bignell Shacklady Ewing
Bill McKay
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Bircham Dyson Bell
BKDS Computer Aided Building Design
And Project
Blass Design
Blaze Neon Ltd
Blow-ups Media Uk Ltd
Blueprint Interior Design
BMD DESIGN
BMW Treecare
Bob Harrison
Boddy And Edwards
Bolton Emery Partnership
Bolton Sign Contractors
Border Tree Care
Boreham Consulting Engineers
Bosal Storage Systems
Bowen Dann Knox Architects
Bower Mattin Ltd
Bowker Sadler Partnerships Ltd
Bowkers Green Barn
Bowles Whitwick Young
Box 3 Design Limited
Boyce Associates
BP & H Services Ltd
BP Environment Services (UK)
BPE Contractors
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Braithwaite Associates
Brecks Technical Solutions Ltd
Brian Elsworth Architect
Brian Hewitt Ltd
Brian McAnoy
Brian Snelham Architect
Brickword Ltd
Bridgford Interiors Ltd
Brighouse Construction Ltd
Brighouse Wolff
Brinkworth
Britannia Property Services
Britannia Security Group
Britch & Associates
British Telecommunications Plc
Broadway Malyan
Brock Carmichael Architects
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Brown Lawrence Projects
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Downey Associates
Downs Variava
DR Design
Dr M.B. Bennett
Dransfield Owens De Silva
Drawing Room
Dreamscape Tree Surgery
Drive Green Ltd
Drivers Jonas
Dryden Goldsmith Architects
DT Signs
DTR Ormrod
DTZ Pieda Consulting
DTZ Pieda Consulting
Duncan Macleod Chartered Surveyors
Duncan Taylor Consulting
Duraframe Structures Ltd
Dutton Group Property Solutions
DWF
DWF (solicitors)
DYKE
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Eaton Manning Wilson & Associates
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Edmund Kirby
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Edward Martin
Edward Roscoe Associates
Edwards & Co.
Edwin Dyson & Sons Ltd
Elaine Adams
Elaine Adams Public Relations
Elite Econoloft Ltd
Elliott Group Services
Ellis Williams Architects
Elmwood Design
Elwers Ltd
Emblem Signs Ltd
Ener-G Combined Power Ltd
Enigma Signs UK
Entwistle Design Services
Envair Ltd
Eric Black Construction
Escape Organisation Ltd
Escott Signs
Espee Design & Development
Estates Dept.

Euro Services
EuroDesign
Eva Jiricna Architects
Everest
Everest Conservatories
Everest Loft
Evo Concepts Ltd
Exchange Estates Ltd
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F Summerfield
F Turner
F.A.S. Developments Limited
Faber Maunsell
Faber Maunsell
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Faithful & Gould
Falconer Chester
Fallowfield Projects Ltd
Falvia Services Ltd
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Fifield Glyn
Finney Associates
Firtree Landscapes
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Fletchers Solicitors
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Forde Edwards & Partners
Foremans Ltd
FORM
Format Shopfitting Ltd
Formby Windows
Fountains
FPD Savills
Francis Bradhsaw Partnership
Frank Belshaw
Frank Whittake TPC
Frank Whittle Partnership
Frank Woods
Freeman's Solicitors
Freewood Contractors
Frensons
Frodsham Sign & Display
FSP Architects & Planners
Futurama Ltd
G Armitage
G C Architectural Services
G E Brandwood
G I Martin Architects
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Manter PVC Windows
Maria D Stefano
Mark J Dunn Associates
Mark Kelly
Mark Line
Mark Storhaug
Mark Thompson (IBS)
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Marsh Associates
Martime Housing Association
Martin O’Brien Associates
Martin Parry Associates
Mary Tremarco
Maslen Brennan Henshaw Partnership
Mason & Partners
Mason Richards Partnership
Mason Wood Architectural Consultants
Massoud Building
MAT @ LTCS
Mathew Greavey
Matt Samuel-Jones
Matthew & Goodmans
Matthews and Goodman
Matthews Sutton & Co.
Maureen Parkes
Maxwell Entwistle & Myrne Solicitors
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MAZE Planning Solutions
MBLC
MBS Project Management
McC Andrew Watts & Co.
McBains Cooper Architecture
MCC Builders
McCormick Architecture
McDyre & Co Town & Country Planning Consultancy
McGarry Roberts & Sons
McHugh Stoppard
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McKeowns
MD Construction (Bolton) Ltd
MDA
Mentha and Halsall
Merco Communication
Merrill Brown Ltd
Mersey Tree Service
Mersey Wirral Lofts
Merseyside Tree Service
Merseytravel
Merson Signs Ltd
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Michael Bromsgrove
Michael Brown Partnership
Michael Courrier & Partners Ltd
Michael Cunningham Planning
Michael Hyde & Associates
Midland Interiors Ltd
Migliori
Migliori Design
Migliori Design Consultants
Mike Alcroft
Mike Cosy
Mike Shields
Miller Walmsley Consulting
Millers Retail Design Ltd
Miss Paula Corry
Mitchells & Butlers
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Mossley Hill Builders
Motor Design Group Ltd
Mott MacDonald
Mouchel Parkman
Mowlem Plc
MPSL Planning and Design
Mr A Mason
Mr A Shalash
Mr B Ryan
Mr B Sherriff
Mr C Scott
Mr C Thompson
Mr D Ainsworth
Mr D Scanlon
Mr D Smallwood
Mr David Cornick
Mr Doohan
Mr E J Keegan
Mr E T Hodgkins
Mr F Burgana
Mr F Doyle
Mr F Mcalleer
Mr F Patterson
Mr F Talbot
Mr F Turner
P Glover
P Hewison
P J Windows & Doors
P Jackson
P MILLWARD
P&J Services
P&T Developments
P.A. Dust
P.A. Taylor
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Palace Lofts
Palace Windows
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Paragon Design
Paramount Landscapes
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Parkman Structures
Parsons Brinckerhoff Ltd
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Patrick Farfan Associates Ltd
Patrick Ruch
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Paul Crowley & Co
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Paul Dooley
Paul Ennis
Paul Gallagher
Paul Hardy
Paul Hetherington
Paul Jeffries Associates
Paul McMullen
Paul Moy Associates
Paul Woodward
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PCE Designs
PCPT Architects Ltd
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Peel Airports (Liverpool) Ltd
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PRC Fewster Architects
Premises Management Unit
Prescott Associates
Prestwich Design Group
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 Prism Interiors
Pro Plan Projects
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Property Tectonics
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Purcell Miller Tritton
Pye Design
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Q.B. Floors Ltd
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Anglican Bishop of Liverpool
Bold Street Traders Association
Bristol City Council
British Gas Transco North West
British Geological Survey
British Transport Police
British Waterways
Burnley Borough Council
Cheshire County Council
City of Chester
Civil Aviation Authority
Commission for Architecture & the Built Environment
Commission for Racial Equality
Council For British Archaeology (North West)
Countryside Agency
CPRE (Northwest)
Cyclists Touring Club
Department for Culture, Media & Sport
Department for Education and Skills
Department of Trade & Industry
Diocese of Liverpool Board of Finance
Disability Rights Commission
Ellesmere Port & Neston Borough Council
Employment Service (NW Region)
English Heritage - North West Region
English Nature
English Partnerships
Environment Agency
Forestry Commission
Friends of the Earth
General Aviation Awareness Council
Government Office For The North West
Green Party
Gypsy Council
Hale Parish Council
Halton Borough Council
Health & Safety Executive
Highways Agency - Network Strategy NW
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Home Office
House Builders Federation
ICOMOS
International Council on Monuments and Sites UK Office
Knowsley MBC
Lancashire Wildlife Trust
Liverpool Central PCT
Liverpool Chamber Of Commerce
Liverpool Roman Catholic Archdiocese
Local Government Association
Mersey Tunnels Authority
Mersey Waste Holdings Limited
Merseyside Ambulance Service
Merseyside Archaeological Service
Merseyside Fire & Rescue Service
Merseyside Tourism Bureau
Merseyside Waste Disposal Authority
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National Housing Federation
National Playing Fields Association
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North West Development Agency
North West Regional Assembly
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Regeneration & Renewal
RIBA
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Royal Mail
Royal Mail Property Holdings
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Society for the Protection of Ancient Buildings
Sport England (NW)
SRA
St. Helens Metropolitan Borough Council
SUSTRANS
The British Wind Energy Association
The Garden History Society
The Georgian Group
The Housing Corporation
The National Trust
The Prince's Foundation
The Theatres Trust
The Wildlife Trust
Twentieth Century Society
UNESCO International Office (via DCMS)
United Kingdom National Commission for UNESCO
United Utilities - Asset Protection
United Utilities - Properties
Vale Royal Borough Council
Valuation Office Agency

Warrington Borough Council
West Lancashire District Council
Wigan MBC
Wirral MBC
Appendix 2. Summary of Revised Preferred Options Report comments received and the City Council response

The following is a summary of the responses received on the Revised Preferred Options Report. The summary of responses follows the structure of the Preferred Options Report, as follows:

- Policy Context and Spatial Portrait
- Core Strategy Vision and Strategic Objectives
- Strategic Objective One - Strengthen the City’s Economy
- Strategic Objective Two - Create Residential Neighbourhoods That Meet Housing Needs.
- Strategic Objective Three - Vital and Viable Centres
- Strategic Objective Four - Attractive and Safe City with a Strong Local Identity
- Strategic Objective Five - High Quality Green Infrastructure
- Strategic Objective Six - Use Resources Efficiently
- Strategic Objective Seven - Maximising Sustainable Accessibility

Comments on the Policy Context and Spatial Portrait

The Policy Context described the most relevant national, regional and local guidance on the preparation of a Core Strategy.

3% of all comments were made on the Policy Context section.

The Spatial Portrait describes the physical, social, economic and other key conditions in the City relevant to spatial planning. It does not set out any policies or proposals, but draws together the evidence and conclusions used in their development.

14% of all comments were made on the Spatial Portrait.

With respect to the Policy Context Section respondents identified a number of other matters which they felt the City Council should also take into account:

- That significant reductions in public spending would mean developers will need to fill the infrastructure funding gap (LCC Highways).
- That areas of coal in north east Liverpool should be safeguarded for prior extraction by surface mining (The Coal Authority).
- That retail development at Wirral Waters will threaten Liverpool City Centre (Grosvenor).
- That the Port Masterplan, SuperPort and Atlantic Gateway be included. (Peel)
- That references to the Regional Spatial Strategy Development Principles (Policies DP1-DP9) be included (4NW).
- That greater protection be given to the Outstanding Universal Value of the World Heritage Site (English Heritage).
There were objections to:

- The emphasis given to economic growth (National Trust).
- The promotion of airport expansion, despite the City’s objectives on climate change (Paul Slater).
- Following the Housing Strategy ambition for lower density housing development rather than high or very high density dwellings (Dai Gwynne).
- The primacy of the City Centre and Inner Areas over the Outer Areas of Liverpool (Benmore Developments Limited).

With respect to the Spatial Portrait there was general support for:

- The comprehensive and informative nature of the Spatial Portrait (Peel, GONW).
- References to the role of Liverpool One (Grosvenor).
- Recognition of creative industries and tourism and the role of the Waterfront (Tate Liverpool).
- Recognition of the importance of the Port of Liverpool, Liverpool John Lennon Airport and the Strategic Investment Areas (Peel).
- Commitments to work with partners to develop wind and tidal energy schemes (Natural England).
- References to the progress being made in the (Housing Market Renewal) Zones of Opportunity (NewHeartlands).

There was, however, criticism across a wide range of issues:

- Inadequate coverage of Liverpool’s historic development, especially of the WHS and historic open spaces, and the need to protect them from inappropriate development, potentially including both Liverpool Waters and Liverpool Airport, while realising their potential to deliver heritage-led regeneration. The aim should not be a balance between competing pressures but integrated solutions where economic, social and environmental objectives are achieved together (English Heritage and the National Trust).
- New Heartlands, Government Office for the North West (GONW), and LCC Highways were all concerned with the limited treatment of transport and other infrastructure issues and opportunities for transport to have a key role supporting sustainable economic success.
- Liverpool Football Club argued that tourism should get a greater emphasis, recognised as being of economic importance and that the role of international brands such as Liverpool Football Club should be highlighted.
- Jack Allen Holdings called for the role of the Port of Garston as a strategic economic driver to be recognised.
- Tesco Stores Limited and Derwent Holdings wanted the improvements to retail provision in the Edge Lane corridor and in district and local centres to be acknowledged.

A number of responses addressed the Peel Holdings Liverpool Waters initiative:

- Grosvenor and 4NW were concerned that it should be a residential-led
development, and that the scale and offer of supporting retail development should be appropriate to the scale of the residential development, and should in no way undermine the role or function of Liverpool City Centre as a regional centre.

- English Heritage wished to ensure that the Outstanding Universal Value (OUV) of the WHS will not be harmed.
- Knowsley Council felt that the level of housing delivery relied too heavily on the Liverpool Waters scheme which might not deliver even in the long term.

Criticisms of the general approach to housing:

- Knowsley Council highlighted the absence of a Strategic Housing Market Assessment arguing that the Strategic Housing Land Availability Assessment is too optimistic given the impact of the current financial situation and the city’s exposure to the apartment market which mean it may not meet its housing targets: for Liverpool to suggest it could meet some of the needs of others is therefore presumptuous.
- For Paul Slater and the Liverpool Chamber of Commerce, however, this possibility was welcomed,
- MerseyCare NHS Trust and others believe that delays in the delivery of housing development will continue in the short term.
- Knowsley Council suggest either delayed phasing of regeneration in the Outer Areas to the latter part of the plan period or that a more balanced approach to housing delivery over the entire plan period is needed.
- Others suggest additional potential allocations for housing, such as a site at King Street in Garston (Gordon Ross), vacant land between the Speke Estate and Speke Hall Avenue (Peel), or at the Stonebridge Cross area which could be a leisure and/or residential led mixed use development opportunity (LCC Development Team Mark Kitts).

Highly contrasting views were expressed about Housing Market Renewal (HMR) activity:

- NewHeartlands asked that it be noted that the HMR programme had secured the first private sector housing to be built in certain parts of inner Liverpool for a century and that despite the recession it is continuing to deliver new housing of a variety of types and tenures; in addition, long term voids have declined, whilst vacancies in new build stock, particularly in the city centre, have increased.
- Merseyside Civic Society argued that HMR relies upon a flawed analysis and has eliminated traditional low-cost housing options for many, and that ‘successive waves of housing clearance and redevelopment create a highly fractured urban landscape and substantial upheaval making many areas unattractive so constraining economic prospects”.

Concerns about the approach to District and Local Centres and out-of-centre development in particular, were also strongly held:

- Knowsley Council argued that the City’s 2006 Quantitative Retail Need Study is
out of date and that the latest national policy in PPS4 is not being followed.

- Speke Unit Trust Limited considered there is a bias towards the modernisation of Edge Lane Retail Park and Stonebridge Cross which it is argued are ‘unsound’ as they have not been subject to a Sustainability Appraisal, and that there is a negative attitude to New Mersey Retail Park.

- Grosvenor was concerned about the damage that retail proposals elsewhere could do to Liverpool City Centre and asked that the City Council continue to object to retail development at Bidston Moss/Wirral Waters, at Cheshire Oaks and at Knowsley/Kirkby.

- Merseyside Civic Society and Dai Gwynne argue that that high density terraced residential areas are needed to help struggling centres to survive, that there is an over-reliance on supermarkets to regenerate centres and a ‘pious hope’ that neighbouring districts will exercise restraint.

Concerns about the future economic development of the City included:

- 4NW pointed out that whilst container traffic at the Port of Liverpool is significant and expected to increase once the post-Panamax terminal is built, the traffic base for the port is considerably wider and that it also has a tourism role.

- Peel however pointed out that there is a significant potential constraint to the future growth of the Port of Liverpool arising from a shortage of land and the need for surface access improvements to sustain and further the growth strategy of the Mersey Ports (and Liverpool John Lennon Airport) and the surrounding area. Peel suggested that a cross-boundary collaborative approach between local authorities is needed.

- GONW, Knowsley Council and Liverpool Chamber of Commerce also supported an increase in the level of collaborative working, for example through the ongoing Liverpool City Region Overview Study of housing and economic development land needs and supply.

Environmental risk issues:

- United Utilities argued that the Liverpool Strategic Flood Risk Assessment (SFRA) is out of date because it does not refer to the 419 properties (compared to an average of 103 per Planning Authority) on the United Utilities foul flood risk register (United Utilities would not release the data previously). It is also argued that the SFRA should look again and in more detail at the Environment Agency tidal and fluvial flood outlines and investigate all forms of flooding including groundwater, pluvial and surface water. The SFRA should also incorporate the findings of the City Council’s Surface Water Management Plan (SWMP) and identify Critical Drainage Areas, and show how these have had an impact on final allocation decisions (Environment Agency, GONW).

- The Environment Agency wished to see the Tue Brook, Sugar Brook, Fazakerley Brook, Croxteth Brook and the River Alt in the Approach 580 SIA, protected from damage, which could arise from development, to their important ecological value, reducing habitat connectivity between them. New development should also seek to improve them.

- The Environment Agency criticised the Spatial Portrait for giving only limited treatment to flood risk and related climate change, which may influence the final
decision on the allocation of specific sites, especially in dock/waterfront areas where climate change may increase tidal flood levels by around 0.85m in Liverpool over the next 100 years.

- The National Trust wanted to see more details about the relationship between climate change and the need to reduce emissions by decreasing the number and length of journeys, and using more sustainable means of transport.
- Sustrans argued that Liverpool’s walking and cycling networks should be given a greater emphasis.
- Paul Slater asked that the Spatial Portrait list all Local Wildlife Sites plus those just below threshold for designation; that the City Council consider creating a new Green Wedge area covering Sefton Park, parts of Mossley Hill and the Greenbank area; and that it be acknowledged that ‘the safeguarding of agricultural land of high quality’ is a key environmental issue ’ (eg land adjoining the airport).
- National Trust and Natural England would like to see new development contribute to the improvement and extension of the green infrastructure resource by linking existing areas to provide a more extensive, accessible and higher quality network of spaces.
- Natural England stressed that the requirements of the European Habitats Directive are also particularly important given Liverpool’s location. The need to reference the Mersey Narrows and North Wirral Foreshore pSPA / pRamsar at Seaforth is highlighted, along with a warning that wind and tidal energy schemes must not be to the detriment of numerous internationally and nationally-protected nature conservation sites.
- LCC Environmental Health drew attention to matters such as noise conflicts between residential property and noise-creating premises in the City Centre, air quality in general, and that the fact that there are over 11,000 potentially contaminated sites (of which more than 1900 are a priority for further investigation).

There were some concerns about the way the Spatial Portrait dealt with plans and strategies beyond the City’s boundaries:

- Peel sought to reassure the City Council that proposals for growth in the Ellesmere Port area will be delivered over a period of 25 to 30 years and will not therefore be of concern to Liverpool regeneration.
- Peel also regarded the City Council’s own concerns about Wirral Waters to be inappropriate given the commitment to continue working constructively with Wirral Council.
- Liverpool Football Club and Paul Slater were also concerned with the Warrington/Omega/Birchwood developments, and how these might impact upon Liverpool.

The spatial subdivisions employed in the Core strategy also drew comment:

- Dai Gwynne argued that the division of the City into the Centre, Inner and Outer Areas was ‘arbitrary’ and likely to create ill-feeling, whereas policies based on permitting or refusing development based on proximity to public transport are
more transparent and understandable.
- Others argued that the key challenge of the Core Strategy is to build on and complete the HMR programme and to address the entrenched and growing worklessness in the inner areas (NewHeartlands).

### The Response of the City Council

The expressions of support are welcomed. In considering criticisms, omissions and revised references, the statutory procedures for preparation of the Core Strategy must be borne in mind. The next version of the document (“Submission Draft”) is concerned with the future spatial development of Liverpool: it will not, therefore, present the extensive policy context and descriptive material contained in the Preferred Options Report.

### Comments on the Core Strategy Vision and Strategic Objectives

16% of all comments were made on this section.

Many of the representations on the **Core Strategy Vision** took up themes addressed in the Spatial Portrait:

- Mersey Forest sought greater recognition for green infrastructure and Jack Allen Holdings stressed the importance of waste management.
- The City Council’s Development Team asked that Stonebridge Cross be cited as a leading example of sustainable development.
- The National Trust, English Heritage and Merseyside Civic Society were concerned that Liverpool should not be treated as wholly urban: the Vision should express a strong ambition for the sustainable management of cultural heritage assets and the whole historic environment, including the protection and enhancement of the OUV of the WHS (without mothballing it).
- Peel felt the Vision should be shorter, inspirational, enthusiastic and easily memorable.
- The National Trust criticised the lack of a specific Climate Change dimension, details of how greenhouse gas emissions will be reduced or how adaptation to Climate Change will take place, and, particularly, how the Port and Airport development will impact on emissions, transport and environmental resources.
- The Environment Agency and National Trust wanted to know how open space would be protected and its quality and multi-functionality improved.
- The Highways Agency wanted details of the transport infrastructure needed to enable the delivery of the strategy.
- Tesco and Derwent Holdings sought references to enhancement of the Eastern Approaches SIA, notably in relation to the Edge Lane gateway.

Comments on the **Core Strategy Objectives** comprised a small number of general
observations, with more in-depth comments on each Strategic Objective:

**General comments**

- 4NW welcomed the 7 strategic objectives.
- Peel commended them for being sufficiently comprehensive in scope whilst remaining suitably succinct.
- Merseyside Civic Society and National Trust considered that they lacked semantic clarity and consistency, and failed to include an overarching objective on climate change as the first objective of the Core Strategy.

### Strategic Objective One - Strengthen the City's Economy

- Natural England asked that environmental resources be included in this objective.
- NWDA and The Theatres Trust requested the addition of education and culture, the Atlantic Gateway and SuperPort concepts and Liverpool Football Club.
- Tesco and Derwent Holdings ask for inclusion of the Edge Lane Central Scheme.
- LCC’s Development Team sought a statement that there are opportunities to grow local business and support social enterprises in the Outer Areas.
- LCC Highways were concerned about omissions such as transport and connectivity.
- Speke Unit Trust Limited the lack of an up-to-date assessment of the need for land for economic development, notably for retail uses.
- New Heartlands argued for retention of enough employment land for economic growth in the Inner Areas to tackle worklessness.
- Gordon Ross and Benmore Development Limited argued for widening the range of new employment uses acceptable in the Outer Areas, to include retail and leisure.
- Knowsley Council felt Liverpool has insufficient evidence to support its assertion that it can help to meet other districts’ employment needs.
- The National Trust believed the pursuit of economic growth in the Speke area could be at the cost of the character and environmental quality associated with the River Mersey and the Speke Hall Estate.
- Paul Slater argued that the growth of Liverpool Airport is not sustainable.

### Strategic Objective Two - Create Residential Neighbourhoods That Meet Housing Needs

- Merseycare NHS Trust argued that Liverpool does not have enough land for high quality, aspirational new homes, except in the stable and prosperous housing market locations within the Outer Areas.
- Gordon Ross considered that new housing sites in the Outer Areas should not be confined to the Regeneration Fringe Housing Areas.
- The Plus Dane Group questioned the assertion that there is an oversupply of social rented housing and wanted details of the role of the private sector, the proposed approaches to housing mix, tenure etc on development sites and for affordable housing and flexibility of tenure to be seen as a suite of housing options with a range of applications for a range of locations.
- Paul Slater questioned the demolition of houses, especially in areas such as the Welsh Streets.
- 4NW and Knowsley Council wanted to know how the quality and mix of housing, including affordable housing especially in areas of greatest need will be tackled.
- English Heritage sought reference to Housing Market Renewal and the need to regenerate and enhance the character of existing housing areas.
- The Liverpool First Strategic Partnership called for a reference to vibrant, healthy and sustainable communities.
- Knowsley Council criticised the absence of a Strategic Housing Market Assessment and of Liverpool’s view that it has the potential to absorb its neighbours’ housing requirements. They suggest a co-operative approach to the phasing and scale of housing delivery in the Outer Areas of Liverpool, to complement existing regeneration strategies in Knowsley.

**Strategic Objective Three - Vital and Viable Shopping Centres**

- Grosvenor supported Liverpool maintaining its national position in the retail hierarchy and ensuring that retail facilities linked to new residential development in the Inner Areas is appropriately located and small scale.
- Gordon Ross supported new facilities linked to housing renewal
- Tesco and Derwent Holdings requested reference be made to enhancing important retail and employment facilities which serve the broader Inner Areas.
- The LCC development Team supported the building of prosperous communities in the Outer Areas,
- Knowsley Council were concerned that new retail floorspace at the Edge Lane Retail Warehouse Park and Great Homer Street may impact upon the viability and vitality of Knowsley’s retail centre.
- Paul Slater suggested that New Mersey Retail Park and Hunts Cross Retail Park would benefit from station(s) along the railway lines in their vicinity.

**Strategic Objective Four - Attractive and Safe City with a Strong Local Identity**

- Grosvenor called for an assurance that all new developments in the City Centre should protect the World Heritage Site.
- New Heartlands wanted a much clearer objective for high quality design, particularly of new housing,
- National Trust argued that, other than the City Centre and the WHS, there is a failure to identify the unique historic and architectural features that are to be protected and enhanced.
- Paul Slater rejected the planned demolition of areas such as the Welsh Streets and their replacement with ‘stereotypical featureless housing that provides no local identity’.
- Tesco and Derwent Holdings wanted action on opportunities to enhance important retail and employment facilities which act as gateways and serve the Inner Areas more generally.

**Strategic Objective Five - High Quality Green Infrastructure**

- LCC Highways and Liverpool Sustrans called for Public Rights of Way and cycle
and walking routes to be added to this objective.
• Mersey Forest sought references to quality of place and to increasing green infrastructure such as green roofs.
• In the Outer Areas the National Trust wanted a better-connected and enhanced multi-functional Green Infrastructure network.
• Paul Slater requested that the Green Belt be added to the assets list.
• LCC Development Team and Natural England requested that biodiversity assets such as the River Alt at Croxteth be added to the list of types of green infrastructure to be protected and enhanced.
• The Environment Agency considered that the approach should be to avoid development in areas of flood risk rather than to just minimise risks to development.

**Strategic Objective Six - Use Resources Efficiently**

• Liverpool Football Club and English Heritage argued that refurbishment of the historic environment including adaptive re-use, backed up by enforcement orders, should be a priority of this objective.
• Jack Allen Holdings wanted a much stronger reference to overall waste management requirements and the need to treat, recycle and recover wastes.
• Benmore Developments Limited argued that proposals to bring large areas of vacant land into economic and beneficial use should be encouraged.
• The National Trust considered that minimisation of adverse impacts on resources is not enough: they should be seen as precious and so used sparingly, recycled and their quality improved.
• Natural England sought references to managing impacts on ecology / biodiversity and sites of designated nature conservation importance.
• GONW cautioned against setting objectives such as “the quantity and nature of waste generated” or “future water usage”, which are not within the remit of a Core Strategy.

**Strategic Objective Seven Maximising Sustainable Accessibility**

• Highways Agency argued this objective should seek to reduce the need to travel by private car.
• LCC Highways sought a reference to the transport SPD and to the importance of accessibility to health facilities.
• Peel wanted the sustainable movement of goods - through a modal shift from road to rail and/or water borne freight - to be a priority.

**Comments on the identification of the alternative Delivery Strategy Options**

The alternative Delivery Strategy Options section describes the development of the alternative strategies, their common features and differences, an appraisal of the merits of each and a statement identifying which of the three
options is preferred by the Council.

Representations were invited on the following aspects of this section of the Preferred Options report:

- Agreement or disagreement with the common features that would form part of the overall strategy, whichever option was selected
- The description of each option
- The Council’s appraisal of the advantages and disadvantages of the Focussed Regeneration delivery strategy option (the Preferred Option).

19% of all comments were made on this section.

**Comments on features common to each of the alternative Delivery Strategy Options**

The common features of the alternative delivery strategy options include maintaining the City Centre as the primary focus for major shopping, tourism, cultural and related activities, continuing the emphasis on economic and employment growth in the SIAs and the sustainable expansion of Liverpool John Lennon Airport.

Representations on this section sought inclusion of additional elements to the common features:

- Speke Unit Trust Limited asked that the New Mersey Retail Park be added, because it would be ‘unsound’ to expect all retail investment in the Outer Areas to be accommodated within the District and Local Centres.
- Benmore Developments argued such an approach to retail investment would restrict future investment in the area, despite evidence that New Mersey Retail Park has benefits for the area and the fact that there are existing consents for hotel and leisure uses on the ANSA site.
- Peel requested the Port of Liverpool be included as a common feature.
- English Heritage wanted to know how tall building proposals will be handled in the WHS and its setting.
- Kensington Fields Co-operative wanted to see a monorail to enable easy and affordable travel to jobs and the avoidance of pooling shops at busy crossroads which makes them less accessible to families with children or the elderly.
- The Racecourse Holdings Trust wanted to see an emphasis on the provision of new family homes at a range of values.
- 4NW wanted to emphasise the need for an appropriate mix of residential properties, informed by the completed SHMA.
- Tesco and Derwent Holdings want priority to be given to ‘investment in shops and services, including district and local centres’.
- Jack Allen Holdings argued for the promotion of employment in the ports and SIAs, to provide job opportunities for those living in the outer areas.
- The Tate Gallery asked that the role of culture, and their presence in the Waterfront area and contribution towards the City’s wider cultural strategies, be highlighted.
Natural England wished to see protection of designated Nature Conservation Sites included within environmental management.

Bellway argued that, given the difficulties experienced by the house building industry, options other than the Inner / HMR area (including developing on greenfield sites), should be considered,

Gordon Ross called for the development of additional land close to the Regeneration Fringe Areas for housing - such as land at King Street, Garston.

Concerns about the impact that the Core Strategy might have on the natural and historic environment are the focus of some comments:

The National Trust argued that 'maximising economic growth' is not an acceptable common feature, Instead, and in common with English Heritage, they believe that 'sustainable economic growth' should be pursued, provided it respects and reinforces local character and does not compromise natural and built environment assets in general, and Speke Hall in particular.

The National Trust also requested deletion of references to the Airport Masterplan because it has not been independently tested through the planning process.

The Environment Agency was concerned about the impact John Lennon Airport’s expansion will have on designated sites, air pollution, the Green Belt, historic environments and Liverpool’s commitment to reducing carbon emissions.

Paul Slater was 'Intensely disappointed' about removal of land from the Green Belt to provide speculative warehousing and facilities for the airport, the expansion of which is not compatible with issues of sustainability'.

English Heritage was concerned that any reliance upon Liverpool Waters could mean the inclusion of too many dominant tall buildings which would damage the Outstanding Universal Value of the World Heritage Site.

Several representations were concerned with the proposed approach to housing numbers and types:

The Kensington Fields Co-operative argued that the target of 40,800 new homes seems geared to developers and will discredit regeneration and housing market strategies.

Dai Gwynne asked why pursue policies based on both:
  o The flawed analysis underlying the HMRI, which is not broadening housing choice but is eliminating low-cost housing options for many and creating a highly fractured urban landscape and substantial upheaval for inner city residents and businesses, and
  o ‘Arbitrary annual housing targets’ which will not be delivered in the short term and so will compromise standards for the next 15 years.

Paul Slater asserted that family housing does not necessarily require gardens,

Dai Gwynne argues that mixed use schemes are not ‘taken to heart’ and that with exceptions such as heavy industry, housing and employment uses can and do mix well with residential.

Knowsley Council took issue with the realism of the Core Strategy in the absence of a Strategic Housing Market Assessment and completed Strategic Housing Land Availability Assessment and, and the therefore unrealistic suggestion of
potential to absorb neighbouring authorities housing requirements.

On economic issues:

- The NWDA sought clarification on how damage to the existing commercial areas of the City Centre would be avoided as commercial development at Liverpool Waters is brought forward, and what evidence will be used to show when development is required.
- GONW is concerned with how edge/out-of-centre uses would accord with national policy in PPS4, especially paragraphs EC5.1 to EC5.5, in terms of the sequential approach and impact.

**Responses to the Consultation Question - Is Option One (Intensive Regeneration) the best option?**

Option One was supported by:

- The Highways Agency, Tesco and Derwent Holdings, because they consider it will have the significant benefit of reducing travel distances for work, shopping and the use of other associated services and industries.
- Jack Allen Holdings, because marginal sites in the outer areas will not have to be used for residential development.
- The Highways Agency, because it will mean high and very high density development in the most sustainably accessible locations, such as public transport corridors and, with respect to the Outer Areas, focusing development in existing centres with good access to employment opportunities, services and facilities.

Those concerned with potential adverse impacts include:

- The National Trust, who are uncertain there would be any travel reduction benefits.
- English Heritage, who feel that reliance on very high density development at Liverpool Waters could damage the World Heritage Site, and have concluded that they would not support development of a scale and density harmful to the OUV of the WHS.

**Comments on the accuracy of the appraisal of Option One**

Of those responding, 70% agreed with the assessment of the advantages and disadvantages of the Intensive Regeneration delivery strategy option.

- Jack Allen Holdings and Racecourse Holdings Trust expressed agreement with the appraisal,
- Liverpool Football Club argued the recession means the need for change in the inner areas is acute and should be given the highest priority. Existing plans such as HMRI and Liverpool Waters should be supported, and housing kept in close
proximity to the city centre and job opportunities,

- NewHeartlands argued that the pursuit of the Intensive Regeneration option will best deliver the Core Strategy objectives.
- The Tate Gallery argued that if 90% of housing growth occurs in the City Centre and Inner Areas, this will damage City Centre commercial viability and vitality and economic growth.
- Natural England agreed with the City Council’s assessment of Option One and stated that it cannot support the option due to the loss of green infrastructure, adverse implications for biodiversity and a lack of any potential wildlife gain,
- 4NW noted the benefit of focusing residential development on the inner areas, but felt the potential need to develop employment land for housing was of concern.

Those who disagreed with the assessment of the Intensive Regeneration Option raised a number of shortcomings with the analysis:

- The National Trust felt that the analysis is weak because there is no assessment of the implication for heritage assets, especially in the City Centre, or of wider considerations in respect of character and identity,
- The Highways Agency was pleased that the need for infrastructure improvements was recognised, but critical that it was not clear how these were linked to proposed development, to reducing vehicular trips or to economic development,
- Tesco and Derwent Holdings also pointed out that opportunities may exist to mitigate adverse impacts and so the conclusion that this option is worse in some respects than the other two may therefore be premature.

**Responses to the Consultation Question - Is Option Two (Focused Regeneration) the best option.**

Some 80% of those responding supported this option. Of these, half pointed to a number of important benefits:

- Speke Unit Trust Limited considered it offers the best overall balance for accommodating growth.
- Sefton Council stated that it is most likely to complement its ambitions for South Sefton.
- Racecourse Holdings Trust believed it offers greater flexibility in the distribution of housing and is less reliant on high density development in the City Centre. It gives greater certainty of social and environmental improvements in the Regeneration Fringe Housing Areas than Option 1, which could be detrimental to the Outer Areas, while Option 3 is seen as potentially detrimental to the City as a whole.
- Liverpool Chamber of Commerce believed that it best supports the economic development of the city, by providing the best balance between preserving employment land and enhancing the city’s housing stock offer,
- The Liverpool First for Health and Wellbeing Strategic Issue Partnership considered Option Two to be the most realistic option to deliver on the health and well-being needs of Liverpool, and that it appears most closely aligned to the
Sustainable Community Strategy and provides an effective balance across the specific objectives of the Strategy.

Other supporters offered qualified endorsements:

- Jack Allen Holdings wanted to see the ports, especially the Port of Garston, and the SIAs, given a more prominent role.
- Gordon Ross asks for flexibility to allow the development of land within close proximity or adjacent to Regeneration Fringe Housing Areas, or previous Renewal Areas, including within the SIAs for residential and supporting uses to aid in the regeneration of the area such as in Garston.
- MerseyCare NHS Trust agree with Option Two but seek flexibility for development in the Outer Areas outwith the Regeneration Fringes, particularly with respect to two of its currently operational sites which are under review and could become available for development.
- The National Trust however would like to see Option 1 and Option 2 combined in order to reduce the risk that the wider network of connected spaces in the Outer Areas could otherwise be lost.
- English Heritage feel that though Option Two has merit but as there is no information about the exact impact it would have on the WHS remains cautious,
- Merseyside Civic Society consider the 70/30 split of new dwellings between the city centre / inner areas and the outer areas to be sensible, but reject the pursuit of detached property as an objective arguing instead for high density townhouse and terraced forms of family accommodation, but not high rise, along public transport routes in line with national density standards and to support sustainable public transport,
- Kensington Fields Co-operative consider Option Two to be a compromise at best

Those who object to Option Two include:

- Tesco and Derwent Holdings believe that it will be considerably less effective at reducing travel distances for work, shopping and the use of other associated services and industries. They argue instead that residential development should be steered towards more central areas to enable commercial development to be promoted in the same or similar locations, and
- The Highways Agency because it will lead to more travel than Option 1 which is better as it focuses on the most sustainable locations and existing infrastructure and transport.

Comments on the accuracy of the appraisal of Option Two

Of those responding over 70% agreed with both the assessment and preferred the option over the others:

- The Racecourse Holdings Trust, LARC, 4NW, NewHeartlands and the National Trust, had previously explained the basis for their support for Option Two in their earlier comments on the option.
- The Tate Gallery considers that increasing the delivery of housing to Outer areas allows scope for additional investment and development of Liverpool’s tourist and
visitor attractions in the City Centre.

- Natural England believes that because Option Two relies less on the inner and city areas it poses less risk to open spaces in those areas,
- Peel explain that they believe that more housing, including family housing, in the Outer Areas such as Speke and Garston will be important in supporting ongoing regeneration activity in South Liverpool.
- Associated British Ports argue that surplus land at the Port of Garston should be used for new residential development because of proximity to the Regeneration Fringes and acute deprivation in that area,
- Merseyside Civic Society supported Option Two but object to the HMRI analysis and the pursuit of low density homes and also consider that the later Proposed Policy Approaches identified to deliver the strategy are inconsistent with it.

Those who felt the City Council should pursue a different approach also include:

- Jack Allen Holdings who would like to see a compromise between Option 1 and 2
- Liverpool Football Club who argued that the degree of emphasis upon Option One needs to be maintained.
- Tesco and Derwent Holdings also repeated their argument that mitigation of the adverse impacts Option One may be possible and therefore it is premature to reject it as inferior to Option Two.

Responses to the Consultation Question - Is Option Three - Dispersed Regeneration the best option?

There was no direct support for this option:

- Jack Allen Holdings, National Trust, Highways Agency, Tesco and Derwent Holdings outline a range of disadvantages resulting from the spread of population across and beyond the city, including an increased need to travel.
- NewHeartlands consider that the Option would fail to deliver the Pathfinder programme
- Racecourse Holdings Trust argue that it could undermine the key role of the City Centre while requiring development of an unsustainable level of greenfield sites in the Outer Areas to meet the housing targets suggested,
- The National Trust consider that the implications for the Outer Areas would be unsustainable as there is not enough land to meet the housing requirements without using green infrastructure resources.
- English Heritage notes the possibility of a better spread of regeneration benefits, but considers that the consequential need for 'higher-than-optimum' densities in the Outer Areas could harm character or appearance. It also criticised the Sustainability Appraisal for failing to draw any distinction between the three options with regard to the WHS.
- The Kensington Fields Co-operative argue that Liverpool does not have a good enough transport system for a more evenly distributed investment otherwise it would be an ideal opportunity to utilise older brownfield sites, freeing up space for city centre parks and open spaces.
Comments on the accuracy of the appraisal of Option Three.

There was no disagreement with the assessment of the advantages and disadvantages of Option Three:

- 4NW argue that the pressure to deliver housing in the Outer Areas could lead to the need to develop employment land for housing and undermine the need to restructure the housing market within the HMR area.
- Natural England and Jack Allen Holdings underline the risk to open space and argue that residents would lose quality of life and have to travel further afield to work if employment land was also lost to development.
- Liverpool Football Club point out that Option 3 would leave vast areas of inner Liverpool under developed/unfinished, contrary to sustainable transport objectives.
- The Tate believed that Option Three will not enable sufficient investment and development in the City Centre to meet its long-term economic and cultural aspirations.

Comments on the City Council’s Choice of Option 2 – Focused Regeneration

In this section of the Preferred Options Report the reasons why the City Council selected Option Two – Focussed Regeneration is briefly explained.

- Peel, The Racecourse Holdings Trust, NWDA, Gordon Ross and Merseycare NHS Trust all expressed their support for this decision.
- Liverpool Football Club however repeated its position in support of Option One arguing it is more sustainable, has a wide range of delivery plans and masterplans in place involving private and public sector agencies and has a flexible array of site options including Liverpool Waters. The club suggested that the biggest risk would be if central government abolished HMRI.
- Tesco and Derwent Holdings repeated their previous call for Option One.
- National Trust and Jack Allen Holdings repeat their case for a hybrid of Option 2 and 3.

Comments on Implementing the Preferred Delivery Strategy – The Proposed Policy Approaches

To implement the preferred Delivery Strategy, 31 Proposed Policy Approaches (PPAs) were developed and organised under the 7 Strategic Objectives. Nearly half of all the comments received addressed the Proposed Policy Approaches and the infrastructure, implementation and monitoring issues associated with them.
Comments on PPA1 – Employment Land Supply

PPA1 states that an existing employment land supply of approximately 274ha will be safeguarded and that this supply is distributed across the City as follows: City Centre - 20ha; Inner Areas - 75ha and Outer Areas - 179ha. In addition major development will be directed towards established employment areas in the SIAs, to provide job opportunities for existing and new residents in adjacent areas of high employment and income deprivation.

The comments on PPA1 combined a mix of both support and requests for amendments:

- 4NW support the PPA and suggest that the City Centre should be predominantly (if not fully) office use.
- NWDA express support but argue that LCC still needs to consider the sub-regional employment land requirement and its distribution across the Merseyside districts.
- Peel support the PPA but suggested there may be occasions where it is sensible to secure regeneration, by relocating existing employment areas and to develop them for alternative uses.
- The National Trust however was concerned to ensure that the existing allocation of employment land should be safeguarded from alternative use such as housing.
- Peel also feel their is a need to address the land requirements for expansion of Ports which are severely restricted in comparison to many other commercial uses which can be more ‘footloose’, Given this Peel cautioned against the Atlantic Gateway SIA being used for other commercial uses not necessarily linked to the Port function.
- Tesco, Derwent Holdings and Benmore Developments objected to the rejection of employment uses other than Use Classes B1, B2 and B8, arguing that the City Council has not accepted that there is insufficient demand for B1, that B2 and B8 are not suitable alternatives for all available sites and in any event national policy in PPS4 allows for retail and leisure uses in both edge and out of centre locations.
- Government Office also highlighted the requirements of PPS4 and the need to take them fully into account in respect of office uses in out-of-centre locations and that a greater context on the restructuring needed in Liverpool's employment offer and clarification of the 'mix of uses' proposed at Liverpool Waters is needed.
- The Highways Agency wished to see the proportion of overall allocations to be located in each SIA to be specified.

Comments on PPA2 Growth Sectors and Areas

PPA2 identifies the business sectors with particularly strong growth potential in the Liverpool City Region which will be supported. These are advanced manufacturing and engineering; financial and professional services; media, creative and cultural industries; biomedical; high value-added knowledge based industries; ICT/digital; tourism; maritime; communications and that
sites in appropriate locations within the SIAs will be identified via other statutory plan documents.

The comments on PPA1 combined a mix of both support and requests for amendments:

- Tate Gallery and The Theatres Trust support the proposed policy approach but would like more emphasis on the role that cultural and arts organisations, and in particular Tate Liverpool, have to play and that where necessary such uses should be protected rather than just supported.
- Peel wishes to see the category ‘maritime’ amended to ‘Port & Maritime’ and that ‘Aviation Related’ be added to the list.
- Everton Football Club object to the omission of the City’s football clubs and wished to see their search for a site for a new stadium supported.
- Jack Allen Holdings argue that employment areas should not be restricted as to business type as this will hinder other potential employment opportunities.
- 4NW state that the list of sectors should not be included as they are already in RSS policy W5.

Comments on PPA3 Economic Development in the City Centre

This PPA states that development in financial industries will be directed towards the Commercial Quarter (particularly around Pall Mall), while other parts of the City Centre around the Baltic Triangle will be the preferred location for further mixed use development associated with creative industries. The Knowledge Quarter, centred on the university and hospital facilities clustered on the eastern edge of the City Centre, will be one of the key growth areas. Development of existing and new facilities to capitalise on the architectural/cultural heritage of the central areas, including the Waterfront - expanding the wealth and job creation potential of the visitor economy whilst also improving recreational provision for residents of the City Region will be supported.

The responses to PPA3 were predominantly of support, but with some suggestions for modification:

- Peel, 4NW and the Highways Agency all express support
- Tate Gallery asks for more emphasis on the role that cultural and arts organisations, particularly Tate Liverpool, will play in contributing towards Liverpool City Council's long-term tourism strategy.
- Grosvenor supports the approach because of the recognition given to role of economic development, the overlapping benefits of retail and residential uses for the City Centre and the promotion given to the central parts of the City Centre and the Waterfront, to capitalise on the architectural and cultural heritage and expanding visitor economy.
- The Theatres Trust, however were concerned that essential arts/cultural community assets could be lost if land values increase and therefore wanted the policy to resist the loss of existing facilities unless it can be demonstrated that the
facility is no longer needed, or that the services provided by it can be served in an alternative location or equally accessible manner,

- NWDA wish to see inclusion of the three NWDA-designated strategic regional sites, at: The Estuary, Speke/Garston; Liverpool University Edge (Knowledge Quarter); and Liverpool Science Park (Edge Lane) or the additional strategic regional sites at Liverpool North Docks and Liverpool Pall Mall and for the their draft purposes for development detailed in the supporting text of relevant policies on economic development

**Comment on PPA4 Economic Development in the Inner Areas**

This PPA states that In North Liverpool, the Atlantic Gateway SIA, will be the main focus for economic regeneration as it has the potential to provide substantial commercial floorspace to meet the “back office” and ancillary functions of businesses in the City Centre.

Sites around Leeds Street and Limekiln/Pumpfields will continue to provide for commercial uses as part of mixed use schemes including residential and other uses. Liverpool Waters is described as a major opportunity site within Northshore which should be developed for a mix of uses, including a substantial residential element. Proposals for a unique national or international facility or project that would bring significant tourism benefit and would complement and strengthen the City’s existing offer would be encouraged. Development on the site should also; make a significant contribution to Liverpool’s economic growth through new commercial and business employment opportunities; complement the substantial public and private investment within the City Centre and demonstrate how the infrastructure required to support it will be delivered.

Further development of growth sectors involving advanced manufacturing and engineering, ICT/digital and communications technology will be supported in the Eastern Approaches SIA by the identification of sites for future expansion.

The comments on PPA4 combine a mix of both support and requests for amendments:

- Peel strongly support this PPA and state they are keen to contribute on the basis proposed, particularly in relation to the Liverpool Waters scheme and that it would also support significant investment by both public sector (for infrastructure provision etc) and private industry in bringing land forward for development.
- LARC also wish to ensure that Liverpool Waters complements and strengthens the City’s existing offer and that any new development would either meet some of the outstanding needs for infrastructure development for the cultural sector, or add value to the existing offer,
- Grosvenor however wish to ensure that Liverpool Waters is a predominantly residential-led development and that the scale of any supporting retail matches the proposed residential development in quantum and type, and does not in undermine the role or function of the City Centre.
- 4NW also expressed concern about potential adverse impacts from development
in the Liverpool Waters area on the Regional Centre,

- Tesco and Derwent Holdings criticise a lack of attention paid to the economic and employment growth opportunities presented by the retail and leisure sector especially in the context of the Eastern Approaches SIA,
- Everton Football Club want to see UDP Policy GEN 7 carried over into the Core Strategy because of the economic importance of both football clubs to the City.
- The Highways Agency is concerned that significant development in the locations described could adversely affect the Strategic Road Network (SRN), and until specific figures are provided, such as scale, the Agency is unable to provide specific comment, but the reference to the need for proposals for Liverpool Waters to demonstrate deliverability of infrastructure is supported.

### Comments on PPA5 - Economic Development in the Outer Areas

This PPA states that at Speke Halewood the remaining land reserves on the existing Estuary and International Business Parks will be safeguarded for the growth sectors of financial and professional services, biomedical industries and manufacturing/engineering, as well as in distribution/warehouse facilities closely allied to expansion of Liverpool John Lennon Airport. Ancillary service facilities should be of a standard associated with a high quality, out-of-centre business park environment. The industrial areas located to the north of Speke Boulevard should also continue to provide valuable job opportunities especially for residents of nearby communities. In the Approach 580 SIA land will be protected for manufacturing, engineering, warehousing and distribution facilities. Sites will be identified in a further statutory plan.

In contrast to the City Centre and Inner Areas, this PPA attracted more objections than it did support:

- The Highways Agency is concerned for the adequacy of transport infrastructure, given its view that new highway infrastructure should only be seen as a last resort after demand management and measures have been employed first.
- United Utilities wish to see land at the Axis Business Park used to allow access to a site in its ownership which is in Knowsley.
- The LCC Development Team asks for text on the Approach 580 SIA to say – ‘Support will be given to local businesses, social enterprises, and providing serviced accommodation to support the Liverpool City's economy’,
- Speke Unit Trust Limited and Benmore Developments argue that the definition of economic development should include retail and other employment uses; otherwise the PPA is not consistent with PPS4.
- Peel also argue that the proposal to safeguard land on the existing Estuary and International Business Parks for specific uses is inflexible and prevents other employment related use continuing the area’s regeneration. They suggest the word ‘safeguarded’ in the third line of the PPA be replaced with the word ‘targeted’.
- Gordon Ross also argues for flexibility and especially that land within the Strategic Investment Areas within close proximity to Regeneration Fringe
Housing Areas such as land at King Street in Garston could be developed for a mix of housing and supporting local facilities/community uses/commercial uses to support regeneration in the Garston area.

Comments on PPA6 - Liverpool Airport

This PPA states that the expansion of Liverpool John Lennon Airport, in line with its Masterplan, will be supported, subject to satisfactory measures to address the potential environmental issues raised by this growth including impacts on: the adjacent natural and built environment, including nationally and internationally important sites and buildings; adjacent residents and other users, of any increases in traffic; noise and air pollution, including those generated by construction activity; the local and regional transport network through the implementation of sustainable surface access strategy. The PPA also identifies that a local change to the Green Belt boundary south of the existing operational airport, to facilitate expansion in the latter part of the Core Strategy period, will be considered. The precise extent of this change, and detailed criteria to be met in its implementation, will be set out in a separate Development Plan Document.

The majority of representations give qualified support to this PPA:

- 4NW and NWDA make similar points in relation to the Green Belt that any extension to the airport should be related to aviation and any development beyond the existing boundary should not be permitted if it would impede operational requirements
- Knowsley Council want to work with Halton Borough Council, LCC and Airport authorities to ensure that the proposed expansion is dealt with appropriately.
- Liverpool Chamber of Commerce supported the recognition given to the Airport as did Liverpool PCT provided that health and Wellbeing issues are subject to further assessment,
- Peel strongly supported the PPA but point out that:
  - The local Green Belt change will be required in the middle of the Core Strategy period rather than later
  - Need also to cover Aerodrome safeguarding and the prevention of off-airport car parks operating in contravention of the Airport Surface Access Strategy (ASAS) in the eventual policy
- The Highways Agency was generally supportive of the airport's expansion, provided it can be delivered sustainably. It welcomed references to the sustainable surface strategy and any rail and Merseytram improvements. Further details on the new link road to the south and east of the airport are also requested.

There were also objections to the PPA including that it:

- Makes no mention is made of the largely grade one high quality agricultural land found at Oglet or of the biodiversity value of the location which is one of the last places in Liverpool where nationally declining farmland wildlife can be found, such as breeding Skylarks, Grey Partridges, Lapwings, Yellow Wagtails and Little
Owls (Paul Slater).

- Wirral Council seek an extension of the criteria 'adjacent residents' to read: 'Impact on residents and other uses (including outside the City in the vicinity of flight paths) from any increases in traffic, noise and air pollution, including those generated by construction activity''
- Government Office considers that the exceptional circumstances that necessitate release of Green Belt land be set out clearly along with how it will be delivered.

**Comments on PPA7 - The Ports of Liverpool and Garston**

_This PPA states that continuing development of the Ports of Liverpool and Garston, as key catalysts of economic growth and job creation, will be supported through the Core Strategy and other statutory plans. It also emphasizes that, improvements to the sustainability of freight and passenger access to the ports, including road, rail and water transport will be sought._

The comments on PPA8 combined a mix of both support and requests for amendments:

- G McIver supports PPA8 and hopes that the Panamax facility and upgrades of the container port rail link and the new M57/58 motorway link will get underway quickly as both projects may help to attract industry to the area.
- Liverpool Chamber of Commerce welcomes the recognition of the important economic role played by both the port and the airport.
- Jack Allen Holdings and ABP support the inclusion of the Port of Garston which is seen as a key catalyst of economic growth and job creation.
- ABP wish to see the policy both support and protect the operational port supported while giving sufficient flexibility for areas of surplus land to be redeveloped for alternative uses, including housing,
- Peel also supported the PPA and draw attention to the Port Master Plan which is being progressed and should dovetail with the emerging LDF following its consultation with relevant stakeholders. In addition Peel asks that the study 'Access to the Port of Liverpool' being co-ordinated by 4NW also be taken into account and the final version of the National Policy Statement for Ports.
- The NWDA supports the PPA as it reflects the Regional Economic Strategy and also note that the 'The Northwest Ports, Economic Trends and Land Use Study' (July 2009) identifies broad strategic options to meet the need for additional port and port-related employment land within and beyond the port and maritime zone including, the extension of the port estate landwards. NWDA recognise this will be a major undertaking requiring CPO and other land acquisition, however growth in port-centric distribution is potentially, the most important strategic opportunity over the next 5-10 years. NWDA recommended that the City Council should work jointly with Sefton Council to address these issues,

The Highways Agency however stated that it would be concerned should any development have a detrimental impact on the operation of the Strategic Route Network otherwise it was supportive of the policy direction of improving sustainability of freight and passenger access, including road, rail and water in order to sustainably deliver the growth of the ports.
### Summary of post-consultation changes to the Policy Approaches for this Objective

There have been changes to the PPAs in this section of the Delivery Strategy, as a result of both the consultation representations and changing national and sub-national policy. These changes include principally:

- Strengthening support for the sustainable growth of the local economy, by protecting the employment land resource across the City and encouraging exploitation of its particular strengths and assets.
- Building some necessary flexibility into the policy framework, to enable its implementation to take account of the fluctuating economic climate over the period of the Core Strategy,

Amendments have been made as a result of consultation responses, the Sustainability Appraisal, Habitats’ Regulations Assessment or other appraisals, together with some to address the impact of the impending abolition of RSS: in many cases the reason for changes overlap. The main details comprise:

- In respect of PPA1 (now SP2), changes that relate to more recent government policy guidance (and therefore also reflect representations from GONW and a number of retail and leisure operators with respect to PPA1) which now widen the definition of “economic development”. Some flexibility has been introduced in order to allow consideration of use of employment land by non-B1/2/8 activity, and providing criteria for assessing applications for economic activities outside the SIAs. Whilst this is in the interests of economic regeneration and job creation, all development proposals will be subject to other relevant planning policy, including that relating to District and Local Centres, which is set out elsewhere in the Core Strategy.
- The growth sectors identified in PPA2 (now SP3) have been adjusted to take better account of Liverpool’s own economic strengths, rather than directly adopting the regional priorities identified in RSS; in particular, and in light of comments from Liverpool and Everton football clubs, Peel, Tate Modern and other operators in the leisure and culture sectors, the importance of the visitor economy (including heritage and cultural assets) has been underlined.
- With respect to PPA 4 (now SP5), there have been minor changes picking up requests for a greater emphasis on cultural and tourism sectors in the City Centre. Requests for more detailed changes such as protecting the loss of cultural facilities and identifying the location of strategic regional sites, will be addressed in a further DPD.
- In PPA4 (now SP5), recognition of the potential contribution from delivery of the Liverpool Waters proposals to the economic, cultural, physical and social regeneration and growth of the City (as highlighted by responses from Peel Holdings, Tate and Grosvenor), has been strengthened; at the same time, the primary role of the City Centre in the expansion of Liverpool’s commercial sector – and the need to protect this, in considering development proposals elsewhere in the City – has also been reiterated.
Requests for inclusion of references to retail and leisure industries are dealt with via the strategic policies for Strategic Objective Three (especially SP22 Out-of-Centre and Edge-of-Centre Retail and Leisure Facilities), and, with respect to the Football Clubs, by the inclusion of new text in SP3.

- PPA5 (now SP6) has had minor modifications to reflect some consultation responses. While the emphasis is on Use Class B development, there is now indicative flexibility to look at other employment-generating uses, subject to other local and national policies.

- Policies relating to the development of Liverpool Airport - PPA6 (now SP7), and the City’s Ports - PPA7 (now SP 8), have been amended, as a result of the Habitats’ Regulations Assessment, to underline the need for proposals to take full account of their location adjacent to the River Mersey SPA/Ramsar site, Speke Hall and other heritage assets, and the environmental safeguards this entails. This also helps the policies to address the concerns of a number of consultation responses. Protection of sites within the vicinity of the Ports from development by uses which do not have the same locational requirements will be addressed through the detail of a further DPD, taking into account the Mersey Ports’ Masterplan.
Strategic Objective 2 – Create Residential Neighbourhoods That Meet Housing Needs.

Comments on PPA 8 Location and Phasing of Housing

This PPA states that the provision of new housing will be managed to ensure the delivery of the HMR pathfinder programme in Liverpool’s Inner Areas, together with housing regeneration initiatives in the City’s Regeneration Fringes. The approach adopted will seek to maximise housing growth in the HMR Zones of Opportunity and North Liverpool in the early phases of the Core Strategy period, allowing for an increasing focus on priorities and development opportunities elsewhere in later phases. The phasing and location of this growth was also described in a detailed table and through a bar-chart showing the trajectory of delivery of housing numbers in five year stages from 2003 - 2026.

The comments on PPA8 were a mix of support and requests for amendments:

- Peel, Racecourse Holdings Trust, 4NW and the NWDA express support for this PPA without qualification,
- The LCC Development Team state that a mixed use project in the Outer Areas could contribute to the PPAs delivery,
- The National Trust however wished to see the extent of housing allocations in the Outer Area reduced to that necessary only to maintain population, as the likely loss of existing and potential areas of Green Infrastructure / greenfield sites of value is a significant concern.
- The Highways Agency consider that under Option 2 this policy could have a more significant impact on the Strategic Route Network than under Option 1, but less than Option 3,
- Merseycare NHS Trust support the overall distribution of housing but argue that the proposal to limit the majority of that growth to within the Outer Areas until after 2016 significantly undermines the short term ability to meet overall housing growth requirements, because complex land assembly and viability issues face many key regeneration proposals within the Inner Areas. They argue for a change in the phasing approach to enable housing growth within the Outer Areas in the early years of the Core Strategy,
- Government Office suggested that it would be helpful to show:
  - the RSS annualised figures and 5 year housing supply figures
  - how any under/oversupply will be managed within the phases
  - why this approach is being taken and how it fits with Growth Point increased figures up to 2017
  - How planned demolition figures have been accounted for, and whether one-for-one replacement is envisaged.
  - A Housing Trajectory, Previously Developed Land Trajectory, and any target for brownfield housing development and the implications of this for how housing land will be phased/ managed will also need to be included.

Comments on PPA9 Housing Provision in the City Centre
This PPA describes the approach proposed for the City Centre and states that in recognition of the positive role it can play in supporting ongoing City Centre regeneration, residential development will be supported, subject to it being part of mixed-use proposals and provided that it does not compromise the City Centre's economic and commercial roles. It explains that areas of existing family housing in parts of the City Centre are an important resource and provide choice in both market and affordable housing and so development or redevelopment in these locations should not prejudice this role. The vast majority of potential City Centre development sites are considered to be best suited to flatted development at high densities. However, current market conditions in this market are very depressed and actual delivery is expected to be relatively low for a number of years, but with the potential to make a greater contribution thereafter.

This PPA was supported by all the representations:

- 4NW pointed out that RSS policies L2, L3, L4 and L5, require an appropriate mix of types, sizes, tenures and prices should be provided.
- The Highways Agency considered it will deliver higher density residential development in central locations, where there is more access to sustainable modes of transport, services, facilities and jobs

Comment on PPA10 Housing Provision in the Inner Areas

This PPA states that the four HMR Zones of Opportunity will have the highest priority for housing growth within the Inner Areas through the early and middle phases of the Core Strategy period. Given that it is located within the North Liverpool Growth Point bid area, the City Centre North Zone of Opportunity will be a particular focus. Those existing residential neighbourhoods in the HMR pathfinder outside the Zones of Opportunity will be the next priority for housing growth, especially where they lie in North Liverpool. Residential development in Waterfront locations to the north of the City Centre in the North Liverpool Growth Point area will also be a high priority in order to meet the Growth Point ambitions. From 2015 onwards, the greater part of new residential development here is expected to arise on the Liverpool Waters site. Housing growth in waterfront locations to the south of the City Centre will be a lesser priority.

This PPA was supported by all but one representation:

- 4NW made the same point as they did for PPA9
- New heartlands considered that it will best deliver their programme objectives programme and thus regenerate the inner areas of the city,
- Grosvenor supports the PPA provided that the scale of any supporting retail development at Liverpool Waters is appropriate to that of the proposed residential development in quantum and offer, and does not in anyway undermine Liverpool City Centre.
- Peel considered that the implied rate of housing delivery appeared reasonable in the light of work on Liverpool Waters.
- Everton Football Club accepted that the four HMR Zones of Opportunity are the highest priority for housing growth within the Inner Areas during the early and middle phases of the Core Strategy, but considered that other sites that can be delivered in the short term such as the Bellefield Sports Ground site should also be promoted in order to meet delivery targets and that Goodison Park is an opportunity for a substantial residential scheme in the medium term, within a HMR Zone of Opportunity,
- The Highways Agency however was concerned that housing development in the North Liverpool Growth Point might result in increased traffic movement on the nearby SRN.

**Comments on PPA11 Housing Provision in the Outer Areas.**

*This PPA states that significant potential supply which exists in the Outer Areas which has the potential to contribute to meeting housing strategy objectives to restructure housing markets by diversifying the local housing offer and creating housing growth in the Regeneration Fringes. In particular, the City Council will prioritise for early delivery key housing regeneration and redevelopment schemes at Stonebridge in the Croxteth area in the north east of the City, and at the Boot Estate in Norris Green in the north east of the City. Given more pressing regeneration priorities that exist elsewhere in the City, housing growth elsewhere in the Outer Areas will not be an immediate priority. However, there will be scope for increased levels of development from the second Core Strategy phase (2016-2021) onwards*

This proposed policy approach was supported by the majority of representations:

- Jack Allen Holdings and the Racecourse Holdings Trust both give unqualified support
- United Utilities suggest that in addition to Stonebridge and the Boot Estate, the Belle Vale / Netherley Regeneration Fringe should also be specifically identified as a priority for early regeneration and redevelopment,
- The Scottish Leather Group suggest the site at King Street in Garston should be considered in the first Core Strategy in the immediate five year supply,
- The LCC Development Team support regeneration at Stonebridge as a policy priority for the Core Strategy when adopted formally,
- Peel request that the Speke Regeneration Fringe area be extended to the west to abut with Speke Hall Avenue.

Objections were made some respondents:

- The Highways Agency do not support new housing development in the Outer Areas because sites are less accessible, create the need for more travel and so have more of an adverse impact on the Strategic Route Network than sites in the Inner Areas and City Centre and if transport infrastructure improvements are not delivered congestion could increase and air quality worsen.
- Associated British Ports object that housing development in the Outer Areas of
the City should not be restricted to the Regeneration Fringes or the north of the City but should be allowed in any area of need of regeneration, including the area around the Port of Garston and in particular wish to include in the LDF for residential development a 4.15 acre site which is currently surplus to port uses. ABP also wanted policy flexibility to cover another area of operational and previously developed land is potentially available for residential development,

- Merseycare NHS Trust state that while they support housing development to assist regeneration of priority fringe areas, a limitation on housing growth in the remainder of the Outer Area will fail to meet objectives to increase the proportion of higher quality/value properties. They advocate that an amendment to state that ‘housing growth elsewhere within the Outer Areas will be permitted but may be more limited in scale and will be focused on delivering larger family housing in order to meet objectives to ensure that the City provides the full range of housing it requires to support regeneration and economic growth’.

Comments on PPA12 Housing Mix City Centre

This PPA states that in the City Centre the emphasis will be on private sector flatted developments at high densities, reflecting the character of the City Centre, the types of opportunities that come forward, and the particular lifestyle that City Centre living promotes. New housing provision should be delivered sustainably by meeting “Building for Life” and “Code for Sustainable Homes” criteria. Further details will be set out in subsequent development plan and supplementary planning documents.

While there were no objections in principle to this PPA:

- The NWDA consider that the references to ‘Building for Life’ and ‘Code for Sustainable Homes’ is unnecessary as it is repeated in other policies.
- Government Office wanted ‘high densities’ defined and wish to know why affordable housing is not mentioned for the City Centre and question why aspirations for greater mix do not seem to extend to the City Centre “where an aspiration for more continental-style family-orientated flatted developments could be expressed”. They advise that the SHMA should identify how much affordable housing is needed and that an informed assessment has been taken of the economic viability of any thresholds and proportions of affordable housing proposed, including the likely impact upon overall levels of housing delivery and creating mixed communities. Reference should also be made as to whether RSLs are on board and content with what is proposed, the mechanisms for delivery, and whether contributions will be used for off-site provision.

Comments on PPA13 Housing Mix Inner Areas.

This PPA states that in existing residential neighbourhoods, particularly in the Zones of Opportunity, the emphasis is on private sector family houses with gardens for owner occupation at densities of 30-50 dwellings per hectare with apartment-style accommodation minimised. Where possible detached
properties will be encouraged, though in areas emerging from market weakness this will be an incremental process. New social housing will only be provided in as part of regeneration projects or where supported/specialist housing is required to meet particular needs. In Waterfront locations an appropriate proportion of family-oriented social rented housing will be encouraged, particularly where this offsets requirements in other parts of the Inner Core allowing new development in those areas to focus more strongly on housing for sale.

In addition and subject to the findings of the SHMA and other new relevant evidence such as the SHLAA, the PPA states that the City Council proposes to include a policy to negotiate with private developers for a proportion of affordable units on private sector housing sites in Waterfront locations. The final form of this policy will specify the proportion of affordable housing to be sought, the size threshold of sites to which it will apply, and the balance required between social rented and intermediate affordable housing. Further details will be set out in statutory plans and supplementary planning documents.

There were more objectors than supporters to this PPA:

- 4NW welcomed the commitment to meet Building for Life and Code for Sustainable Homes standards but wanted detail about how the targets set out in the policy and the other later statutory plans will be linked.
- Peel expressed support but sought confirmation that high density development was as appropriate in waterfront locations as in the City Centre and that any affordable housing requirement will need to depend on market evidence at the time any planning application is determined and the anticipated delivery timescale and phasing.
- Everton Football Club recognised the need for family homes but objected to the statement that, “the provision of apartment-style accommodation should be minimised”. The Club argued for flexibility on a site-specific basis so as not to restrict densities on sites where high density development may be appropriate, and to help to meet local housing targets.
- United Utilities also object and ask for some additional flexibility so that if it is demonstrated that a site is no longer viable due to a requirement for affordable housing, the policy can allow an alternative approach which can be agreed with the City Council having regard to any particular challenges faced by individual sites.

Comments on PPA14 – Housing Mix Outer Areas.

This PPA states that in the Outer Areas the emphasis will be on delivering mixed-value, private sector family housing, especially semi-detached and detached houses - at densities of 30-50 dwellings per hectare to help achieve the diversification of the stock required to meet the City’s housing strategy objectives. In the Regeneration Fringes new development should reflect the Council’s aspiration for more private sector homes in Council Tax bands C to H and a proportion of detached property will be encouraged. New social housing should only be provided as part of regeneration projects or where
supported/specialist housing is required to meet particular needs.

In other locations in the Outer Areas, and subject to the findings of the forthcoming SHMA, other new relevant evidence such as the SHLAA, the City Council proposes to include a policy to negotiate with private developers for a proportion of affordable units on private sector housing sites. The final form of this policy will specify the proportion of affordable housing to be sought, the size threshold of sites to which it will apply, and the balance required between social rented and intermediate affordable housing. New housing provision should be delivered sustainably by meeting "Building for Life" and "Code for Sustainable Homes" criteria. Further details will be set out in subsequent statutory plan and supplementary planning documents.

There was a slight majority of supporting representations on this PPA:

- 4NW support PPA14 for the same reasons as PPA13
- Peel would also like to see the Speke Regeneration Fringe extended to Speke Hall Avenue.
- The LCC Development Team ask for Stonebridge Cross to be specifically referred to and the 2nd paragraph amended to read “or where social/supported/specialist housing is required to meet identified needs”,
- The Highways Agency’s ask for housing development to be supported by a strategic sustainable transport network which influences travel behaviour to reduce the use of the private car,
- NewHeartlands strongly supported the PPA as it will best deliver their programme objectives and thus regenerate the inner areas of the city,
- United Utilities object on the same grounds as they did for PPA13
- The Scottish Leather Group, while supportive of development in the Regeneration Fringe Housing Area at Garston, also suggest the site at King Street in Garston should be considered in order to aid the on-going regeneration of these areas,
- MerseyCare NHS Trust’s object that the proposed requirement for 25% affordable housing on sites within the Outer Areas is not based on robust evidence of a Strategic Housing Market Assessment (SHMA) and therefore is unsound and so no affordable housing target should be set at this stage. They also suggested that the Olive Mount and Mossley Hill Hospitals have housing development potential and could make a significant contribution to meeting Liverpool’s strategic housing objectives, and while both sites are still in use may have significant redevelopment potential for a range of high value, aspirational housing which the City critically needs.

Comments on PPA15. - Gypsy and Traveller Sites

This PPA states that the preferred approach to meet the accommodation needs of Gypsy and Travellers is to seek to identify a site or sites through statutory land allocations plan and that the identification and assessment of potential sites will be based on the following: that the site can be supplied with essential services (i.e. electricity, water, drainage) and has access to public...
transport; that the site is well designed and landscaped to give privacy between pitches and neighbouring uses, can be safely accessed from the public highway, and has adequate parking and turning space; that the site can accommodate work-related uses without undue detriment to the immediate locality due to noise or nuisance; and whether the location of the site is subject to protective policies, such as Green Belt and Sites of Special Scientific Interest

The comments on PPA15 combined a mix of both support and requests for amendments:

- Knowsley Council point out that the RSS Partial Review is yet to be completed, and could have implications for the target amount of gypsy and traveller provision that the City Council should provide. They also suggested mentioning the Merseyside Gypsy and Traveller Accommodation Assessment of February 2008.
- The National Trust would like to see the final bullet point make specific reference to cultural heritage resources in particular those that are part of the City’s tourism offer. Government office suggested explaining the context in more detail and the setting out of how many pitches the RSS review requires.

Summary of post-consultation changes to the Policy Approaches for this Objective

While it is recognised that market conditions pose some risk to delivery in the early phases of the Core Strategy, it is considered that there is adequate scope for residential development opportunities consistent with Core Strategy policy and objectives, to come forward.

In view of this the Strategic Policies for housing delivery contained in the Submission Draft Core Strategy document remain fundamentally as indicated in the equivalent PPAs in the January 2010 Revised Preferred Options Report. Those changes that have been made are more about amplification and clarification than substantial changes in approach. These changes include:

- Revision of the housing trajectory diagram to take account of actual delivery 2008-2011, and the extension of the Core Strategy end date from 2026 to 2028. This broadly shows an increasing level of housing delivery over the Core Strategy timeframe. In the context of the regeneration needs of the Inner Areas, the provision for 570 dwellings (net) per annum in the Suburban Areas (formerly the Outer Areas) in the first phase of the Core Strategy (2013-2018) - an increase of 41% on the rate experienced 2003-2011 - is considered to provide ample development opportunities in the Suburban Areas.
- Under the revised approach, the City will still deliver its original RSS commitments (which amounted to 35,100 dwellings net between 2003 and 2021), as originally sought. The additional 3,510 dwellings arising from the Growth Point has now been moved into the post-2021 period, reflecting depressed housing market conditions in the Growth Point Area and changes in the timing of delivery of Liverpool Waters.
Other important changes concern PPA8 (SP9 in the Submission document), which address the matter of the location and phasing of new housing. These changes arise largely because of the impending abolition of RSS and the resulting need to reappraise the Core Strategy’s position in respect of all RSS policy.

Aside from the housing figures, Policy SP9 now also accounts for the revocation of RSS, by incorporating within it specific policy clauses which were previously only set out in RSS, and hence taken “as read”. A number of these clauses deal with the important linkages between housing growth and the need to secure the sustainability of the existing housing stock. Specifically, they address the need, whilst seeking housing growth, to ensure that new housing development does not have an adverse cumulative impact on the existing housing stock and housing market; make the best use of the existing stock; reduce vacancy rates in the existing dwelling stock, through the increased re-use of suitable vacant housing; and respond to the need to restructure local housing markets. In addition, Policy SP9 now refers explicitly to the priority for development being focused on previously developed land and buildings rather than greenfield land, with an indicative 90% to be delivered from such sources. This was previously contained within RSS Policy L4.

New evidence, in the form of the findings of the City’s Strategic Housing Market Assessment (SHMA), which is an important study into the City’s housing needs and a requirement of national planning guidance, has been taken into account in modifying Policy SP9 and the strategic policies on housing mix (SPs13 to 16). (These latter policies derive from PPAs 12, 13 and 14 in the Preferred Options Report). In particular, the policies address the issue of affordable housing in a slightly different way. A standalone statement on affordable housing has been introduced in SP13 to clarify the Core Strategy stance, affirming the City Council’s commitment to delivering affordable housing to meet needs and to making best use of the various delivery mechanisms at its disposal. It commits the Council to setting out a full affordable housing policy in a further DPD, which will follow from the Core Strategy, taking account of the full SHMA findings and further evidence arising on housing viability, and enabling full evaluation of the alternatives open to it.

Further modification, resulting from consultation responses received, has been made to the approaches set out in the PPAs in the Preferred Options. There has been an amplification of the approach to housing growth in the Regeneration Fringes in SP12, emphasising the need for new housing development to relate to the need for an improvement in the sustainability of existing residential neighbourhoods. In SP14, qualified support for the provision of family housing in the City Centre has been introduced, provided that residential amenity can be adequately protected. In general, the section provides clarification that the delivery of private sector houses with gardens would not be the only housing development supported in both the Urban Core and the Suburban Areas, and that, in order to ensure the future sustainability of neighbourhoods, other forms of housing, including at higher densities, would be supported, where site circumstances warrant.
Strategic Objective 3 Vital and Viable Centres

Comments on PPA16 The Hierarchy of Centres for Liverpool

The objective of this PPA is a sustainable distribution of shops and services within Liverpool to support local communities and regeneration need. To provide this the City’s shopping centre hierarchy will comprise the following types of centre:

- **Liverpool City Centre** - as the Regional Centre will be the main comparison shopping destination for Liverpool City Region and the focus for major comparison retailing, leisure, cultural and tourist facilities, and other main town centre uses;

- **District Centres** - will provide the focus for shops, services and community uses outside the City Centre. The objective will be to support investment within them and to achieve a mix of uses (with retail as the principle use) to ensure vibrant and vital centres which meet the needs of the local communities that they serve.

- **Local Centres** - will be the focus for shops and services to serve everyday needs. The objective will be to maintain the current level of investment within these centres.

- **Neighbourhood Centres** are the lowest tier in the hierarchy providing very localised facilities. The objective will be to maintain current levels of provision and their character.

The boundaries of all the identified centres and potential development opportunities within them will be defined in a statutory land allocations plan. The factors to be taken into account in defining boundaries are indicated as will the will the need to be given to an appropriate allocation and uses within areas on the edge of centres.

All the representations on this PPA were of support including:

- 4NW, Knowsley Council and the Highways Agency.

- Government Office asks that the changes to the hierarchy are made more explicit, as well as whether any additional retail provision is needed and where/how it will occur, as well as any action to be taken on centres.

- Grosvenor strongly welcomes the support given to Liverpool City Centre as the Regional Centre, for Liverpool One and its inclusion in the Main Retail Area. They stressed that all major new proposals in the greater Liverpool Sub-Region should be assessed against this policy to ensure that they do not undermine this key objective.

Comments on PPA17 - City Centre Shops and Services

This PPA states that the Main Retail Area (MRA) including Liverpool One will be the primary location for major comparison goods retail development within the City and City Region. Its vitality and viability will be protected and no other
Retail proposal within the City and Sub-region should have an adverse impact on it. Its boundary will be defined in the Land Allocations DPD but includes the MRA and Paradise Street Development Area (Liverpool One) as defined in the UDP. The London Road Shopping Area will provide a supporting role to the Main Retail Area and will be maintained and enhanced as appropriate. In addition to the established arts and cultural uses around William Brown Street, the Waterfront areas of the City Centre will be a focus for regionally significant cultural, tourism and leisure uses. Small scale shops and services for residents within the City Centre will be supported. Such uses should form part of mixed use schemes and be in close proximity to residential areas.

- Peel welcome regionally significant cultural, tourism and leisure uses around the waterfront areas.
- The Highways Agency supports the PPA because city centre locations are generally the most accessible in terms of sustainable modes of transport.
- LARC support the PPA but seek a greater emphasis on the independent cultural and retail offer in Liverpool city centre, including artist-led venues and galleries, as these give individuality and an edge to the city centre that is increasingly missing from other cities,
- Grosvenor expresses strong support for this PPA and in particular welcome the protection to be afforded to the Main Retail Area in which Liverpool One is to be included. They also ask that:
  - The City Council implements this policy by objecting to any proposals in the Sub-Region that it feels will impact on the City Centre,
  - City Centre policies should be sensitive to changing market circumstances so that while supporting proposals for retail to enhance the vitality and viability of the MRA they are also flexible enough to allow the change of use of vacant A1 use retail units to other town centre uses, where this would not harm the MRA retail circuit,
- Wirral Council, however, object to the PPA on the grounds that while Liverpool is the regional centre the policy should not result in an over-concentration of growth, adversely affecting the vitality and viability of other centres or the creation of unsustainable shopping patterns. They ask that the PPA should acknowledge that RSS Policy W5 identifies Birkenhead, Southport and St Helens as places where comparison retailing facilities should be enhanced and encouraged to ensure a sustainable distribution of high quality retail facilities.

Comments on PPA18 - Inner Areas Centre Hierarchy.

This PPA sets out the proposed hierarchy of centres within the Inner Areas.

- The District Centres comprise - Breck Road, County Road, Edge Hill, Great Homer Street and Park Road. It also specifies the delivery of a new comprehensive District Centre with an expanded retail offer and a mix of other services and community uses at Great Homer Street and to support the main convenience shopping needs of new residents on the Liverpool Waters site. Park Road will be the focus of enhanced convenience shopping facilities and associated public realm and environmental improvements investment within Breck Road, Edge Hill and County Road will be supported particularly where it would deliver an improved focus within the centre and improve the public realm.
• **The Local Centres specified in the PPA comprise - Kensington, Lodge Lane-Smithdown Road North and Tuebrook.** The facilities within these centres will be protected and enhanced to ensure vital and viable shops and services for local communities. Investment within the centres should support the wider regeneration priorities within the area particularly HMR. The final category in the formal hierarchy are the Neighbourhood Centres and Parades these are not listed by name in the PPA except that it is proposed that East Prescot Road will be re-classified as a Neighbourhood Centre. These shopping parades are distributed along arterial routes and provide important day to day facilities for local communities and will be protected.

The PPA states that to support the development of the Liverpool Waters site for residential development (from 2015) small scale convenience shops, services and community facilities (new Neighbourhood Centres) will be supported to serve the needs of the new residents on the site.

• The proposal for a new and expanded district centre at Great Homer Street was supported by Sainsburys who have a development agreement to construct a major new supermarket as part of the project,
• Peel supported the general approach to neighbourhood centres in Liverpool Waters
• Tesco and Derwent Holdings support the allocation for Park Road
• Grosvenor particularly welcomes the requirement that development at Liverpool Waters would include “small scale convenience shops, services and community facilities” to support the new residential communities. They consider that any proposals for Liverpool Waters should not by quantity or type of retail development exceed this level,
• Sefton Council supports the hierarchy provided that the retail components of both Great Homer Street and Liverpool Waters is predominantly convenience to meet local needs without detrimentally affecting retail centres in South Sefton, either individually and cumulatively.

**Comments on PPA19 - Outer Areas Centre Hierarchy**

This PPA sets out the proposed hierarchy of centres within the Outer Areas.
• **The District Centres comprise Allerton Road, Belle Vale, Broadway, Old Swan, Smithdown Road South, Speke, Walton Vale and Woolton.** Broadway will be the focus for new and improved retail facilities which should contribute to its role and function as the primary centre serving the north of the City and complement housing regeneration within the area. At the other District Centres the approach will be to protect the vitality and viability of Allerton Road, Belle Vale, Old Swan, Smithdown Road South, Speke, Woolton and Walton Vale to ensure that they continue to act as a focus for the local community and provide a range of shops and services.
• **The Local Centres will comprise Aigburth Road, Garston, Hunts Cross,**
Wavertree High Street, West Derby Village. Facilities within these centres will be maintained and opportunities to provide a greater focus within the centres supported.

- The Neighbourhood Centres/Parades will comprise Aigburth Vale, Knotty Ash, Muirhead Avenue East, Rice Lane and Rose Lane. The Outer Areas have numerous shopping parades along arterial routes and within residential areas which provide important day to day facilities for local communities. The facilities within these centres will be protected. The above centres have been re-classified as Neighbourhood Centres.

- The Highways Agency supports this PPA, provided that the distribution of retail and services provided is to address an identified need and the scale is commensurate with such need and does not adversely impact on the operation of the Strategic Route Network,

- Sainsbury’s support the retention of Woolton as a District Centre but object strongly to the reclassification of Knotty Ash and Rice lane in the retail hierarchy. They argue that both centres continue to meet the criteria for their existing designation, and are of significant value to the local communities and regeneration programmes such as HMRI. They suggest instead consolidation, such as the tightening of the Rice Lane boundary.

- The Standard Life Group object in the ‘strongest terms”, to the re-classification of Rice Lane as a Neighbourhood Centre/Parade, arguing that Rice Lane is the fifth largest Local Centre, with 65 retail units and so does not accord with the definition of a small parade of purely neighbourhood significance but instead matches the definition of a large Local Centre set out in PPS4. They argue it is currently vital and viable and has more convenience and comparison floorspace and a lower vacancy rate than other centres that are not being downgraded, which is therefore, highly inconsistent and unjustified,

- The LCC Development Team request the inclusion of a retail centre at Stonebridge Cross as the heart of a major new community-led leisure and or residential development project, which seeks to deliver 500-800 new households which will re-populate the locality and support a quality convenience retail function to serve existing and future local residents in the community. The existing Quantitative Retail Assessment (May 2006) is dated and a fully up-to-date quantitative assessment to verify the need for this provision is therefore urgently required.

Comments on PPA20 - Out of Centre Facilities

This PPA states that in the Inner Areas appropriate proposals to modernise and enhance the shopping environment of the existing Edge Lane Retail Warehouse Park will be supported provided that there would be no detrimental impact on the City Centre or nearby District Centres and it contributes to the wider regeneration of the Edge Lane Corridor. In the Outer Areas whilst the existing role of New Mersey and Hunts Cross Shopping Parks is recognised further retail and leisure facilities will not be appropriate. The appropriate reconfiguration and upgrading of Stonedale Crescent Shopping Park will be supported provided any retail facilities are small scale to serve local
community needs. There should no adverse impact on Broadway District Centre or any other nearby centre and the design should complement housing development in the area.

The outright supporters of this PPA were in the minority, including:

- 4NW who also advised that any extensions to facilities should be in accordance with the PPS4 impact and sequential tests.
- The National Trust who also consider that there is no requirement to provide any additional out of centre retail facilities and that to do so would be contrary to the need to bolster existing centres, reduce the need to travel and encourage alternative modes of travel to the private car.
- Tesco and Derwent Holdings support the promotion of Edge Lane Retail Warehouse Park for retail and leisure development that is reflected in the PPA.

Those generally in favour but seeking a tightening up of the PPA include:

- Grosvenor who want it to be made clearer that new out of centre facilities should only be permitted where there would be no detrimental impact on the City Centre.
- Government Office want clarification about whether additional retail/leisure provision is envisaged at these out of centre locations, and if it is, how it would meet the tests set out in PPS4 policy EC5, such as the sequential test.
- The Highways Agency point out that they normally discourage out of centre facilities, however it is recognised that the policy direction appears to be to enhance and modernise existing provisions rather than add further significant development. They asked to work closely with the Local Authority to assess the potential impact of such improvements,
- The LCC Development Team while agreeing that reconfiguration and upgrading of Stonedale Retail Park should be supported suggest the deletion of “small scale” and replacement by “of an appropriate scale” so that facilities are able to serve local existing and future community needs. Furthermore in view of the need to support Broadway District Centre suggested the policy read: “the design should complement new development in the area” and suggest adding in the Outer Areas section: “It is important to improve accessibility to local convenience retail by non-car modes”.

The remaining responses are of objection with argument that the policy approach is both too restrictive and inflexible and that it does not adequately take into account PPS4 which it is stated does not rule out new development at out-of-centre retail parks and therefore a blanket prohibition of further retail and leisure facilities at such locations is unsound.

- Speke Unit Trust Limited also argue that there is no justification for the positive approach taken towards Edge Lane Retail Park and Stonedale Crescent and the opposite (negative) approach towards New Mersey Shopping Park. Neither of the Edge Lane or Stonebridge schemes are justified by an up to date robust evidence base nor have they been subject to a sustainability appraisal and so are 'unsound' on the basis of not being justified. They argue that a prohibition against further retail and leisure development at these locations would prevent new investment and restrict new employment in conflict with RSS priorities. They
consider that expansion could be accommodated within or as extensions to existing buildings and that there is significant scope for linked trips and the likelihood of no substantive additional infrastructure being required to accommodate it.

- Benmore Developments also argue that PPS4 allows for consideration of out-of-centre retail, that retail development can underpin regeneration and that the Estuary and International Business Parks are significantly enhanced by the retail and leisure facilities at New Mersey Retail Park which makes the area a destination. They also point out that the Secretary of State found that the major out of centre Marks & Spencer superstore at Cheshire Oaks was consistent "with parts of policy W5 of the RSS". It is inequitable and unjustified to have a total ban on future expansion of New Mersey Retail Park. Policy W5 of the RSS is therefore recommended to the Council.

- Peel also view the policy as overly restrictive and believe it should allow for the appropriate redevelopment of land adjacent to Speke Boulevard and Speke Hall Avenue for leisure and retail uses as this is a key site which has significant potential to assist with the regeneration of South Liverpool and enhance the Speke Boulevard “gateway” into the City. The site already has the benefit of a planning consent for leisure uses.

Summary of post-Consultation changes to the Policy Approaches for this Objective

The Strategic Policies set out in the Submission Draft Core strategy document for shopping centres within the City have not significantly changed from the overall approach set out in the Revised Preferred Options Report.

The policies that have emerged continue to identify a sustainable hierarchy and network of centres as the focus for new investment, and to control development outside this network in accordance with national planning guidance and the City Council’s own evidence base. The policies set out the role and function of each type of centre and continue to identify the centres at Great Homer Street, Park Road and Broadway for growth.

Changes that have been made to the detailed wording of the policies and justification text to reflect consultation comments and evidence.

PPA 17 “City Centre Shops and Services” has now become Strategic Policy 19. Amendments have been made to reflect the fact that:

- Whilst the City Centre is the primary retail centre in the City Region, there are town centres within the region that also provide comparison goods retailing.
- The City Centre Retail Study, which considers the health and function of the MRA, distinct quarters within it and the future role of peripheral retail areas, has been completed.
- There is potential for provision of independent shops and services.

PPA 18 “Inner Areas Centre Hierarchy” has become Strategic Policy 20 “Urban Core Centre Hierarchy”. The following amendments have been made:
Minor changes have been made to fully reflect the District and Local Centre Study (2009).

Minor changes have been made to the Liverpool Waters text, to ensure that the retail is delivered incrementally as the resident and working population increase.

PPA 19 “Outer Areas Centre Hierarchy” has become Strategic Policy 21 “Suburban Areas Centre Hierarchy”. The policy has been amended to reflect comments in respect of Stonebridge and the completion of a new quantitative retail and commercial leisure study. This policy now includes a proposal for a new Local Centre at Stonebridge. It has also been amended to fully reflect the District and Local Centre Study (2009), and the availability of a potential development site within Broadway District Centre.

PPA 20 “Out of Centre Facilities” has become Strategic Policy 22 “Out of Centre and Edge of Centre Retail and Leisure Facilities”. Changes have been made to reflect comments regarding national planning guidance in respect of town centre uses and to reflect the Quantitative Retail and Commercial Leisure Study (2011). The policy now includes:

- Criteria to allow for out-of-centre and edge-of-centre proposals to be assessed, specifically in respect of the sequential approach and impact assessment.
- Thresholds for application of an impact assessment in accordance with national guidance.
- Reference to the type of conditions that may be attached to planning consents.

However, a number of comments have not been reflected within the policies. Knotty Ash and Rice Lane have not been reinstated as Local Centres. These centres have been reclassified as Neighbourhood Centres on the basis of evidence. It is considered this will not preclude future investment within these centres, which was the primary concern of the objectors to the reclassification of those centres.

While there were strongly expressed objections to doing so, the policies continue to support enhanced retail facilities at Edge Lane Retail Warehouse Park, due to qualitative and quantitative needs and to reflect existing consents. At the same time, the policies do not support further retail facilities at New Mersey. Whilst its existing role and function is recognised, it is not regarded as a centre and therefore not considered to be a sustainable location for further development.

**Strategic Objective Four - Attractive and Safe City with a Strong Local Identity**
Comments on PPA21 - Historic and Architectural Environment

This PPA states that development in or adjacent to the World Heritage Site, Conservation Areas and Historic Parks should preserve and enhance the area and its special features for which it is designated. These features can include the buildings and landscaping that are integral to the character of the area and important views within and into the area.

This PPA was supported by most respondents:

- The NWDA asks for clarification of the term ‘in or adjacent to’ pointing out that in terms of World Heritage Site the buffer zone needs to be taken into account in policy,
- Grosvenor agree that development should preserve and enhance the World Heritage Site, Conservation Areas and Historic Parks and that any new development in the city centre should respect the new design standards typified in Liverpool One,
- Peel however consider that there is some inconsistency with regards to the terminology and policy tests proposed
- The National Trust are concerned that the references to historic resources are partial and do not identify all relevant sites of national importance; Speke Hall is both incorrectly detailed and should be safeguarded. The policy wording does not protect listed buildings in their wider setting and fails to conform to national and regional policy and views into and out of heritage assets should also be protected,
- English Heritage also object to the partial reference to designated heritage assets and the omission of the locally important. A stand alone policy for the World Heritage Site was requested and a separate strategy policy for the future of Liverpool’s historic environment and its management. English Heritage set out an extensive and comprehensive list of factors to be covered. It was also suggested that, given its importance to the city, the model provided by the policy approach to Green Infrastructure with its 5 separate policies should be used as this would give optimum detail to different parts of the city.

Comments on PPA22 Key Urban Design Principles

This PPA states that all new development and conversions of existing buildings and spaces should be well integrated into the existing urban form and the natural and built environment of the City, and ensure a high quality urban environment by amongst other things: delivering high quality architecture; protecting the City’s historic fabric and contributing positively towards its identity and character; Improving the public realm and providing for public and private spaces that are clearly distinct and contribute to continuity and enclosure; contributing to improvements in safety and the reduction of crime by enhancing natural surveillance, providing active street frontages, and ensuring appropriate enclosure and overlooking of public spaces; supporting increased permeability, strengthening the linkages between places and contributing to a well defined movement network.
particularly in relation to walking, cycling and access by public transport; ensuring that buildings and spaces can adapt to changing environmental, social and economic circumstances, particularly climate change; creating variety and choice to support mixed communities, develop the identity of a place and ensure that all new developments are accessible to all; and supporting improvements to air and water quality through good landscaping which can increase biodiversity.

A number of principles are also proposed for residential environments including that new residential developments should follow the standards set out in the Code for Sustainable Homes and create adaptable residential environments that can accommodate changing needs easily, taking into account ‘Building for Life’ criteria and create places of distinctive character and legibility. Roads, parking and pedestrian routes should be integrated, safe and reflect the needs of the community and the environment. Proposals for new residential development and environments should demonstrate durability showing how they can contribute to the creation, maintenance and enhancement of communities in the long term.

In order to improve the Quality of Local and District Centres new developments in or adjacent to centres should be well integrated with the existing centre by respecting the building line of the existing urban environment, building up to the edge of the curtilage, providing for linked trips to the remainder of the centre and contributing towards improving the environmental quality of the centre.

This PPA was supported by 85% of the responses to it:

- Grosvenor expressed the view that new city centre development should respect the design standards typified in Liverpool One and all new development should be integrated into existing urban form,
- NewHeartlands highlighted concern about the quality of design on non HMR schemes in the pathfinder area and the Audit Commission’s conclusion that a design guide be put in place to remedy this
- J Alcock suggested obliging new residential areas to incorporate well-loved local open spaces which had been subjected to investment by the community in any development,
- 4NW suggest an additional reference to RSS policy EM1(C) and in particular to the Victorian and Edwardian commercial development that RSS states should be protected, conserved and enhanced,
- Peel supports the PPA but asks that for case by case flexibility as regards Code for Sustainable Homes and Building for Life criteria, and that standards above prevailing Building Regulations are not required,
- English Heritage request that new design is informed by a thorough understanding of context thereby helping to ensure high quality. An additional bullet point on reinforcing distinctiveness is sought to require more comprehensive intelligence on conservation areas and for the Buildings at Risk register to be reformed to include Heritage Areas at risk,
The Tate Gallery drew attention to a need to increase the linkages between the Albert Dock and the waterfront area through better public transport and sustainable development initiatives. Tate also considered that high quality planning is also paramount for the development of the City’s public spaces,

Natural England supports improving air and water quality and the strengthening of linkages between places but would like to see support for the provision of green corridors,

The Highways Agency supports measures to improve the accessibility and desirability of sustainable modes and public transport and, with regard to Local and District Centres, welcomed an approach to integrate new development with existing sustainable transport networks to encourage linked trips to help reduce the need travel,

LARC support the PPA but ask that the commitment to high quality urban design and the recognition of the contribution made by art in the public realm be more widely emphasised. They wish to see the vision statement more explicitly refer to the need for a high quality of design in all new developments and to build on Liverpool’s status as a cultural capital and that a strategic approach to art in the public realm should be adopted in Liverpool,

Merseyside Police were concerned that there was not enough emphasis on the reduction of crime and disorder in line with PPS 1 and they suggest a section on community safety is needed with a focus on safe accessible environments. They suggest something similar be produced to the St Helens SPD that focuses upon Design and Crime and. A reference was also sought to holding pre-application discussions with the Architectural Liaison Unit where appropriate,

The National Trust argue that the second bullet point fails to deal with the wider settings of historic assets and so should be replaced with ‘Protecting the City’s historic fabric, including the wider settings of designated features, and contributing positively towards its identity and character’.

Summary of Post Consultation Changes to the Policy Approaches for this Objective

There have been a number of changes in this section which now sets out Strategic Policies 23, 24 (replacing PPA 21) and 25 (replacing PPA 22). The consultee responses have been addressed in the formulation of these policies in a number of ways:

- SP23 (including the supporting text) reinforces the need for better links between the Key Urban Design PPA and Green Infrastructure.
- The inconsistency of terminology between these PPAs and PPS5 has also been rectified.
- In SP24, references have been added to heritage assets, both designated and non-designated, as defined by PPS5 (such as listed buildings, Scheduled Ancient Monuments and the wider setting of heritage assets).
- A new policy, SP25, has been added in response to requests for a standalone policy for the World Heritage Site.
- In order to provide the framework to engage with public art, and as recommended by consultees, SP23 includes the need to incorporate high
quality public art into new developments, where appropriate.

- A number of consultees to PPA21 advised that the use of the number of conservation areas as a monitoring indicator would be ineffective. Accordingly the monitoring indicator now reads ‘percentage of Conservation Areas with up to date Conservation Appraisals and Management Plans’.

- Consultee responses to PPA22 recognised the need to produce a residential design guide as an important delivery tool. The development of a design guide as a Supplementary Planning Document has now been added to the delivery section of Objective 4, in order to address the need for good urban design city-wide and in all types of development.

There were also a number of issues raised by consultees that have not been taken into account in the formulation of Strategic Policies 23, 24 and 25:

- Some responses asked for a separate policy providing detailed guidance on the management of the historic environment. It is considered that such a policy would be too detailed for a Core Strategy, but could be developed in a further DPD if necessary. For the time being, all of the Heritage and Design policies contained within the Unitary Development Plan remain in force. They will only be replaced if the Land Allocations and City Policies Plan supersedes them.

- Merseyside Police concern that the Core Strategy should focus more on crime and disorder through a specific criteria-based policy, is a valid concern, but its adoption would require policy at a level of detail that is not suitable for the Core Strategy: it would, however, be appropriate in subsequent documents where detailed design matters are addressed. The Vision, Strategic Objectives and SP23 provide a clear message that new development should help the city address crime and safety issues.

- A number of respondents were concerned that there should be a flexible ‘case by case’ approach to the Code for sustainable Homes and Building for Life criteria. This issue will also be dealt with in further documents relating to design.
Strategic Objective Five - High Quality Green Infrastructure

Comments on PPA23 Green Infrastructure

This PPA explains that Liverpool’s green infrastructure resource will be managed and enhanced to ensure benefits are maximised, for example, to mitigate the effects of climate change, improve physical and mental health, create a more attractive environment, reduce the heat island effect, improve air quality and enhance the biodiversity resource by:

- Maintaining, protecting and enhancing areas that possess a high number of green infrastructure functions in order to maximise the full range of benefits;
- Integrating biodiversity features and innovative green infrastructure measures into the design and construction of new development, including public realm projects;
- Improving or creating green links between open spaces and biodiversity sites to facilitate the movement of wildlife and create attractive environments for leisure activities;
- Protecting and improving Liverpool’s open space, water courses and biodiversity assets; Giving priority to the enhancement of the City’s open space and the links between them;
- Providing or enhancing green infrastructure at key gateways to, and along key corridors in the City.

Liverpool’s green infrastructure resource will be identified within other statutory plans and in identifying housing sites within those plans which may involve a potential green infrastructure resource, the value, quality and function of that space would be a key consideration in determining its suitability for development.

The majority of responses to this PPA were of support and even those expressing an objection did so to seek an amendment or clarification:

- Mersey Forest suggests the policy begins "Liverpool's green infrastructure will be protected, managed and enhanced to support the regeneration of the city and its distinctive sense of place". They also suggested that an action point be included to increase the proportion of green cover and permeable surfaces within the built environment and/or exercising careful stewardship of the natural environment to safeguard vital resources including water, air and soil in order to both mitigate and adapt to climate change,
- 4NW seek more discussion of “Urban Landscape” expanding it to include all green / open spaces and that a reference should be made to improving maintenance, management and restoration of historic parks and landscapes and the need for investment to ensure this is implemented. While praising the promotion of Green Infrastructure it should, through mapping, support wider policy development and also make links to the Liverpool City Region Green infrastructure Strategy. Habitat creation and expansion could be developed further within a separate biodiversity policy in line with RSS policy EM1. RSS Policy EM4 - Regional Parks are also important due to Liverpool’s links with the Coastal Trail and Mersey Waterfront Regional Park,
- The National Trust support the PPA, considering it to be a proportionate and appropriate response to the range of green infrastructure resources in the City, especially having regard to the pressures that they are under in an overtly urban setting,
- Natural England consider that the commitment to green infrastructure will, if implemented properly, contribute to their strategic objectives of a healthy and natural environment, inspiring people to conserve and value the natural environment, make sustainable use of the natural environment and collectively secure its future,
- The Environment Agency request that ponds which are a United Kingdom Biodiversity Action Plan (BAP) priority habitat be considered as urban green space and included within PPAs 23, 26 and 27. Watercourse improvements should also be protected and improved as identified in the North West RBMP,
- Peel asks that the PPA acknowledge that a site's identification as 'Green Infrastructure' (GI) should not in itself prevent suitable and beneficial development coming forward particularly in areas in need of regeneration. Peel also welcome the statement that there will be a process of consideration in respect of a site's value, quality and function,
- The LCC Development Team support the principle of encouraging Green Infrastructure in innovative design solutions and in order to maximise green linkages and infrastructure,
- English Heritage argues that the PPA should cover the need to integrate and incorporate the protection, enhancement, maintenance and restoration of open spaces with historic interest into GI proposals.
- Knowsley objects that the green infrastructure map displayed in the Preferred Options document could give a false impression of Liverpool’s current provision and that the release of GI land for development would need substantial and justifiable evidence,
- Liverpool Chamber of Commerce are concerned that there should be more emphasis on climate change adaptation and transition to a low carbon economy.

**Comments on PPA24 Supporting Green Infrastructure Initiatives**

*This PPA states the City Council will support, and help deliver the aims and objectives of sub-regional programmes to enhance green infrastructure in the Liverpool City Region by: supporting the work of the Mersey Forest and helping to implement the aims of the Sub-Regional Green Infrastructure Framework; supporting the Mersey Waterfront Regional Park initiative and ensuring that any proposal will be subject to an assessment to ensure any impact on Natura 2000 sites is avoided or mitigated and by contributing to the North Merseyside Biodiversity Action Plan.*

Only Government office responded to this PPA, asking whether the City Council wished to set out open space standards policy within the Core Strategy.

**Comments on PPA25 Green Infrastructure in the City Centre**
**The approach set out in this PPA is to protect existing areas of open space; maximise the opportunities for enhancing the green infrastructure resource through the provision of urban landscape features such as green roofs and walls, and tree and shrub planting within new developments and public realm projects. Green infrastructure should also be well integrated with the internationally and nationally protected historic environment.**

This PPA was supported by:

- Peel, and LARC who considered that the strategy rightly highlights the need to improve green spaces across all areas of the City
- English Heritage objected that in this and PPAs 26 and 27, the open spaces, parks and gardens with historic and architectural interest have not been identified.

**Comments on PPA26 - Green Infrastructure in the Inner Areas**

This PPA requires that new development should ensure that the green infrastructure resources meet the needs of residents for access to high quality open space for leisure and recreational purposes and contribute to the creation of a high quality residential environment. This will focus on improving the overall quality, value and function of the green infrastructure resource for the benefit of local communities by:

- protecting strategically important open spaces – Newsham, Stanley, Walton Hall and Princes Parks, protecting locally important open space sites, protecting existing locally important wildlife sites at Melrose Cutting and Stanley Sidings,
- maximising opportunities to enhance and/or introduce biodiversity into existing areas of open space,
- using green infrastructure to create an attractive environment to support high levels of growth in the Inner Areas by creating green paths and cycle ways that link residential areas with existing open spaces, employment locations, local community services and leisure facilities

With the exception of the previously noted English Heritage objection, all the responses to this PPA were of support:

- John Alcock argued that it is vital to ensure communities are committed to improving their surroundings. Any threats to locally loved open space should be resisted or designs adjusted to incorporate them,
- Peel supported the PPA for the reasons set out in the related rationale, and
- LARC supported the PPA for reasons also previously set out.
- The Environment Agency also repeated their point with regard to ponds.

**Comments on PPA27 - Green Infrastructure in the Outer Areas**

Protect and enhance important open spaces and biodiversity assets is to be achieved by protecting and enhancing, including where appropriate by working in partnership with other districts and relevant bodies, green
infrastructure to minimise the impact of development on existing biodiversity assets comprising the Mersey Estuary SPA/Ramsar/SSSI, 23 Local Wildlife Sites, Local Nature Reserves at Croxteth Country Park, Mill and Alder Wood, Childwall Woods and Fields, and Eric Hardy in Allerton.

A second element of the PPA is the protection of strategically important open space assets comprising:

- the Green Wedges at Otterspool and Calderstones/Woolton which comprise extensive areas of linked open spaces;
- the Sefton, Calderstones and Croxteth Parks City Parks and the restored open-land at the Garden Festival site which is also part of the Green Wedge, and the Mersey Waterfront Regional Park.

Protecting and enhancing locally important open space sites in the Regeneration Fringes will require a consideration of their value, quality and function.

The Environment Agency and LARC both supported this PPA for the reasons previously given, other representations include:

- the LCC Development Team support the rationale for increasing green space and environmental protection and also suggest adding Stonebridge Cross as a green infrastructure opportunity site,
- Jack Allen Holdings argue that this section should allow for areas that are either incapable of being developed or are unlikely to be developed to be incorporated into the open space provision,
- The National Trust object to the omission of Speke Hall as an important City Park and as it is a key resource within the Outer Area, and
- English Heritage stated that those open spaces, parks and garden with historic and architectural interest should also be identified.

Summary of post-consultation changes to the Policy Approaches for this Objective

While a number of suggestions and requests for changes to the City Council’s approach have been made in the consultation comments, it is considered that there is no need for significant changes to the approach set out at the Preferred Options stage. There have however been some minor modifications accommodating some of the suggested changes from consultees, and for other reasons:

PPA 23 ‘City-Wide Green Infrastructure’
- Has been re-titled ‘SP26 Protecting and Enhancing Green Infrastructure’, and to help make it easier to use, it has been split into two sections – Protecting and Enhancing,
- In terms of content, as a result of consultation responses, a more explicit reference to using Green Infrastructure to link aspects of neighbourhoods together – housing, shops, employment etc, to promote active and sustainable travel - has been included.
• In addition new bullet points have been added with regards to new development increasing the levels of permeable surfaces and to the protection of open spaces of historic value.
• The criteria used to determine planning applications where the loss of a Green Infrastructure resource might result have been clarified and sets out the factors which will be considered during the planning application process.
• The policy seeks to maintain or address deficiency in access to areas of open space. Detailed standards will be set out in a further development plan document.

There are no changes to the sub-area policies other than consequential numbering changes. This means that a number of the issues raised in some consultation responses have not been taken forward into the final policy wording. These include:

• A request to identify the benefits of Green Infrastructure for climate change in more detail is considered unnecessary, given that it is clearly identified in the Strategic Objective, is also dealt with elsewhere and would otherwise introduce too much detail and does not warrant greater mention over and above all the other benefits of Green Infrastructure.
• Requests for a separate biodiversity policy is a matter that can be better dealt with in a subsequent development plan document.
• Although reference to the Mersey Waterfront Regional Park has been removed as it is currently unclear as to the status of this, SP27 supports any initiative that aims to create or enhance green infrastructure.
• Other matters of detail that will also more appropriately be addressed in other plan documents include
  o a request to explicitly mention ponds, and while these are one element of the Green Infrastructure resource they are already included in the description of Green Infrastructure as comprising water spaces, as explained in the opening paragraphs.
  o Speke Hall Estate is not specifically mentioned in the Green Infrastructure Strategic Policies as it is not part of the Green Wedge nor is it a formal ‘City Park’, however this has no impact on its importance and the protection it enjoys.
### Strategic Objective 6 – The Efficient Use of Resources

#### Comments on PPA28 Sustainable Growth

*This PPA explains that the sustainable growth of the City by will be achieved by:*

- ensuring development contributes to achieving the objectives of the City Council’s Climate Change Strategic Framework;
- using a sequential approach to the redevelopment of land to ensure that the use of previously developed land is maximised;
- securing the remediation or redevelopment of contaminated sites, where appropriate; providing high levels of energy and water efficiency and a sustainable approach to construction and the use of materials including meeting increasingly higher levels of the ‘Code for Sustainable Homes’ and other standards such as BREEAM ‘very good’ or ‘excellent’ ratings;
- providing at least 10% of total predicted energy requirements from renewable sources in developments comprising 10 or more dwellings, or in non-residential development, over 1000m² gross floorspace;
- providing and/or supporting continuing management as necessary for sustainable drainage methods; over the plan period achieving progressively higher levels of the use of secondary and recycled aggregates;
- having regard to the waste hierarchy and minimising and managing the quantity and nature of waste generated from construction onwards. This includes providing for the source separation, recycling and safe storage of different types of waste awaiting collection and, where appropriate, facilities for public use; and identifying and allocating sites suitable for new and enhanced waste management facilities for the identified waste management needs of Merseyside & Halton. This is being done via a joint Merseyside Waste Development Plan Document currently being prepared by the six Merseyside Districts (including Halton).

The responses to this PPA were generally positive:

- The Highways Agency support this PPA because of the role it could play in tackling climate change and also drew attention to sustainable accessibility to new development which should be located in the vicinity of good public transport links,
- 4NW request that more detail is needed on how waste disposal is to be delivered in line with RSS policy EM10, EM11, EM12 and EM13 and the Merseyside Waste Development Plan Document,
- The Scottish Leather Group support a sequential approach to ensure use of previously developed land is maximised and drew attention to the Group’s representation to the SHLAA that the remediation associated with their site in Garston is not anticipated to be a barrier to development viability,
- Peel, while expressing full support for the concept of Sustainable Growth, consider that future policies should allow flexibility on a site by site basis in respect of Code for Sustainable Homes, BREEAM standards and on-site energy
generation where viability and feasibility will be particularly important,

- Peel also confirmed that the Port offers particular benefits and opportunities linked to existing waste handling facilities and the use of sustainable transportation of waste through rail linkages or water-borne activity,
- Tesco and Derwent Holdings object to the 10% renewables target arguing that it may not always be practicable or appropriate and so suggest the text be prefaced by the insertion of 'Where practicable' and by the insertion of the following sentence at the end of the bullet. "Where applicants are unable to adhere to this 10% renewables target, they shall submit a detailed sustainability assessment to seek to justify this position",
- The Racecourse Holdings Trust and Bellway make similar points that these requirements are additional development costs which are difficult to absorb in a depressed market and that Building Regulations are also delivering requirements and policies need to avoid duplication. A non-prescriptive policy approach is advocated.

**Comments on PPA29 - Environmental Impacts**

*This PPA states that new development should seek to avoid negative impacts on the environment. Where a negative effect is identified this should be mitigated by appropriate measures. Specifically, development proposals should:*

- *minimise adverse impacts on and include measures to improve air quality within the City*,
- *minimise light and noise pollution*,
- *improve and protect water quality including the River Mersey, Leeds Liverpool Canal, and other inland rivers and watercourses and demonstrate that it will not exacerbate potential sources of flood risk such as sewer and groundwater.*

*Where development may have an impact on sensitive areas where and which would therefore require avoidance or mitigation measures including at areas at risk from coastal and river flooding including small areas along the River Mersey and on the north east and south east fringes of the City, and North Docks and Garston Docks which provide access to and processing arrangements for mineral resources from the Mersey Estuary.*

*The responses to this PPA were generally positive:*

- The Environment Agency support this PPA, but asked that it also cover groundwater quality and "no net loss in biodiversity or no negative impacts upon protected species or habitats". The North Merseyside BAP targets should be referred to and the river corridors within "sensitive areas" included, given the ecological importance of some of the watercourses within the River Alt catchment
- Natural England would like to see a statement ensuring that development does not cause an adverse effect on the features of the Designated sites within the Mersey
- The National Trust support the PPA and requested the Core Strategy should avoid the impacts where warranted by the scale of the impact and the importance
of the resources affected,
- The Highways Agency supports measures to improve air quality
- Peel also welcome the PPA but ask that it should be noted that the environmental impacts at the North Docks arise from a diversity of operations, such that avoidance and mitigation does not relate solely to the activities associated with mineral resources from the Mersey Estuary,
- 4NW argued that RSS policy EM5 integrated water management should be referenced more within PPA 29 and the policy should require new developments to incorporate sustainable drainage systems and water conservation and efficiency measures to the highest contemporary standard, and it should support retrofitting sustainable drainage systems and raising people’s awareness of water in line with RSS Policy,
- English Heritage wanted the PPA to clarify that the definition of the environment includes the historic environment.

Comments on PPA30 Renewable Energy

This PPA explains that in order to make efficient use of the City’s natural resources and to contribute further to tackling climate change, proposals for standalone schemes for the generation of renewable energy will be supported provided that they would have no unacceptable impacts (including contributing to cumulative or in combination impacts) on the built or natural environment.

There were no objections to this PPA although its supporters suggested a number of enhancements:

- 4NW asks for more detail to show how the Core Strategy will meet the national and regional requirements in line with RSS policy EM15, EM16 and EM17,
- Natural England supported the commitment to renewable energy and the need to avoid environmental impacts,
- Peel Energy Holdings Limited supported the PPA and requested that the Core Strategy recognise that the Mersey Tidal Power scheme will have major economic benefits for Merseyside, West Cheshire and the Northwest Region. They also suggest that until a single preferred tidal power scheme for the Mersey Estuary has been identified, a policy approach consistent with advice in PPS22 should be set out which supports the Mersey Tidal Power study and standalone renewable energy projects subject to satisfying a range of criteria which they set out in detail covering such matters as renewable energy generation targets and economic, social and environmental benefits and impacts. With respect to the Habitat Regulations they suggest adopting the wording of the Habitat Regulations that plan policies should have: ‘no adverse impact on the integrity of Natura 2000 sites in the area (including contributing to cumulative or "in combination" impacts on the environment) or, if there is an impact, that it can be demonstrated that it meets the test of imperative reasons of overriding public interest’.

Summary of Post Consultation Changes to the Policy Approaches for this
Objective

The Strategic Policies for the Efficient Use of Resources Objective have not changed the overall approach set out in the Preferred Options Document. The policies continue to ensure sustainable development, minimise environmental impacts and support renewable energy.

Changes have, however been made to reflect comments received, the findings of the Habitats Regulations Assessment and issues arising from the imminent abolition of RSS.

- PPA28 (now SP31 Sustainable Growth) included a reference to a sequential approach which prioritised previously-developed land; this is retained as a requirement to use previously-developed land ahead of green field sites, unless there are good reasons to do otherwise. It is now been reflected in the lead strategic policy: SP1 Sustainable Development Principles.
- The criteria incorporated in SP26 now include references to Sustainable Urban Drainage and water efficiency, to reflect consultation comments. With regard to the representations made in respect of the inflexibility of the policy approach of pursuing the Code for Sustainable Homes and BREEAM, the justification text for the policy states that evidence suggests that Level 3 can be achieved, subject to other matters of development economics and site viability. The reference in PPA28 to 10% provision from renewable energy resources has been moved to SP32, as the more appropriate strategic policy.
- PPA30 (now SP32 Renewable Energy) has been modified to reflect the content of RSS policy, in order to retain its provisions within Liverpool’s Development Plan, following the imminent abolition of RSS. This policy now requires development proposals to provide for 10% of their energy requirements to be provided from decentralised and renewable or low carbon sources, unless (in the interests of flexibility), “it can be demonstrated that it is not feasible or viable”. The policy also reflects the requirements of Habitats Regulations Assessment (HRA) and comments made by Peel.
- PPA 29, now SP33 Environmental Impacts Policy, has additional criteria in respect of water treatment infrastructure and the avoidance or mitigation of impacts on European habitat sites, as recommended by the HRA findings. In addition reference to groundwater quality has been included to reflect consultation representations.
Strategic Objective Seven - Maximising Sustainable Accessibility

Comments on PPA31 - Improving Accessibility and Managing Demand for Travel

This PPA states that development which singly or in combination might have a significant impact on the movement of people should positively manage travel demand and contribute to the improvement of accessibility in general, particularly by walking, cycling and public transport.

Proposals should demonstrate compliance with short to medium term transport infrastructure projects programmed in the current Local Transport Plan which includes: improving access to Liverpool John Lennon Airport, including the provision of a new airport, link road and support for measures to maintain and increase the proportion of passengers arriving and departing the airport by public transport; Improving access to the Ports of Liverpool and Garston, including rail freight access including the reinstatement of the "Olive Mount Chord" between the City Line and Bootle Branch and encouraging the retention and/or expansion of rail-freight from the Port of Garston/Freightliner location; improvements in the City Centre (e.g. Car and coach parking and delivering improved air quality); strategic road schemes and facilities for park and ride; and protecting Merseytram Line One and longer term objectives relating to the development of the Merseytram network.

The majority of representations supported this PPA:

- LCC Highways note however that there is no reference to sustainable freight distribution e.g. tonnes shifted by rail/sea, inland waterways etc. In addition they seek references to goods as well as people, including the possible need to consider land uses for purposes such as consolidation centres,
- 4NW seeks inclusion of a travel plan requirement for all new developments and existing major sites to ensure a range of sustainable transport alternatives are provided rather than the private car.
- The Tate Gallery and LARC would both like to see the electrification of the train line between Manchester and Liverpool included.
- LARC would also wish to see audiences for cultural venues encouraged to use public transport more regularly, e.g. with special incentive schemes as it would also be a positive contribution to climate change,
- Peel support the PPA but suggested that links with the Local Transport Plan should be more explicit, especially references to key public sector proposals and responsibilities with regard to accessibility improvements.
- Peel would also welcome a specific reference to the re-instatement of the Canada Dock Freight Line to provide additional rail freight capacity and capability to the southern operational dock area,
- Associated British Ports asked that future access improvements to the Port should not prejudice the redevelopment of surplus port land for alternative uses, including housing,
- LCC Development Team is supportive of the introduction of Merseytram Line.
One which will directly serve the new community at Stonebridge Cross, providing increased access to employment opportunities and local facilities whilst promoting sustainable transport usage.

- Grosvenor pointed out that the Liverpool One development was designed so that it could accommodate Merseytram in the future, but wish to be kept informed of any discussions regarding the implementation, timing or route of a potential Merseytram development.

The Highways Agency however object to the PPA because there is no explanation of what is meant by ‘strategic road schemes’ and the Infrastructure Appendix provides no estimated costs. Moreover there is a need to show what will be achieved through the infrastructure projects, i.e. reduction in trips, mitigation of development proposals, etc. this should be done when identifying specific site locations during the development of the other DPDs on which the Agency will comment.

Summary of post-consultation changes to the Policy Approaches for this Objective

PPA31 (now SP34) has not changed significantly from the approach set out in the January 2010 Revised Preferred Options Report. Some of the detailed wording of the policy has been amended to take account of consultation responses, the impending abolition of RSS, the Health Impact Assessment and updated evidence from LTP3, operative since April 2011. Changes include:

- A reference to using existing transport infrastructure: where this is not available, development should be phased to coincide with new transport infrastructure.
- The need for Travel Plans has also been incorporated, to ensure that new developments provide a range of sustainable transport alternatives. The policy has also been amended to refer to the movement of goods as well people.
- Links with the Local Transport Plan (LTP) have also been made more explicit and the policy now highlights that the development should not undermine or compromise programmes and plans in the LTP. The relationship with the LTP has also been emphasised in the supporting justification.
- It was noted that the reinstatement of the Olive Mount Chord has been completed and therefore this reference has been removed,
- To reflect the need to promote cycling and walking a bullet point has been added to support walking and cycling routes as identified as part of the LTP3’s Active Travel Strategy,
- the policy has been amended to state that strategic road schemes are those identified in statutory transport policy documents as those schemes in the previous LTP2 are now under construction / completed and there are no similar schemes for Liverpool in LTP3,

The support given to the improvement of access to the Ports of Liverpool and Garston was welcomed by consultees and this has been retained. In relation to this a specific reference to the re-instatement of the Canada freight line was requested, however, the Access to the Port of Liverpool Study does not
specify the re-instatement of the Canada Dock it only states that as a key measure rail port access alignments will be preserved where the case for intervention can be made, for example, the Canada Dock rail link.

In terms of monitoring it was requested that there be a reference to sustainable freight distribution included. This is not included as we do not have access to this data which should in any event be picked up as part of the LTP monitoring.