

Spatial Planning Policy Team
Liverpool City Region Combined Authority
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Group President

Nick Thompson

Group Chair

Dear LCR Spatial Planning Team,

Towards a Spatial Development Strategy (SDS) for the Liverpool City Region (LCR) up to 2040, November 2023

1. I am writing a response to above mentioned consultation on behalf of the CPRE, The Countryside Charity groups in Cheshire, and in Lancashire, Liverpool City Region, and Greater Manchester.
2. CPRE welcomes that many of the key issues, such as positive climate resilience action, brownfield first policy, enhancement of biodiversity, and improvement of environmental health to address health inequalities and deprivation are referenced. The hard work of the LCR spatial planning team is noted and applauded. CPRE focuses on six key tests when planning for rural places, which are relevant to all spatial levels. Below, I set out overarching comments concerning the six tests and append referenced comments.

About CPRE

3. We are CPRE, The countryside charity. We want a thriving, beautiful countryside for everyone. We believe in countryside and green spaces being accessible to all, rich in nature and playing a crucial role in responding to the climate emergency.

1. Local democracy and community engagement

4. CPRE's members in the constituent authority areas of Halton, Knowsley, Liverpool, Sefton, St Helens, and Wirral have helped secure local plan policies to prevent

‘needless’ loss of land in countryside for development, which directly supports brownfield sites being regenerated as a priority.

5. The societal value of the Merseyside Green Belt in providing accessible countryside was highlighted. It was purposely drawn with tight boundaries to promote much needed regeneration due to LCRs proud industrial past.
6. During Covid many more people walked and exercised in their local green space. The health and well-being benefits are clear as well as other benefits of not traveling to enjoy countryside. More development puts pressure on our greenspace, including sensitive ecology and we hope the LCR SDS will be cautious about where needed new development goes. It is a choice and some options lead to much greater public good than others.
7. CPRE via a student internship provided LCR Combined Authority planners with a mapping layer that showed all the Brownfield Register sites and highlighted those of scale served by train and bus to help identify future sites for allocation. The SDS should capitalise on LCR’s brownfield land assets through to 2040.
8. Therefore, it is welcome that the SDS is not proposing further Green Belt release. CPRE observes that the local plans identify a robust supply of land up to 2040.
9. Where future development is focused is a choice. The location should seek to maximise economic, social and environment factors in balance.

2. Affordable housing and developer contributions

10. The housing requirement for LCR is shown as 83,600 net additional dwellings.
11. Enough ‘needed’ homes should be planned, but not an excess. The Secretary of State has indicated the Standard Method and use of ONS 2014 data will be consulted on in 2024. The LCR should pay attention to this issue. By applying ONS 2018 data the identified housing requirement is 79,515 dwellings, some 5,000 less than the LCR SDS is planning for. The housing requirement for Wirral ought to be guided by the local plan examination, which is at the post examination hearing stage as a lot of effort from all parties has gone into securing the right number of homes to ensure a no-Green Belt release local plan. Therefore, Wirral’s requirement and elsewhere ought to be reduced accordingly.
12. In the past three years, all the LCR authorities have overperformed against the government’s Standard Method derived Housing Delivery Test, as shown in Table 1.

Despite this excellent performance the cost of homes has not decreased. There remains a lack of affordable housing. Policies to deliver affordable housing, including those for social rent ought to be included and the over-supply taken into account.

Table 1. Housing Delivery Test performance, 2022

Area Name	Homes required			3-year total	Homes delivered			3-year total	HDT result %
	2019-20	2020-21	2021-22		2019-20	2020-21	2021-22		
Wirral	731	519	760	2010	818	565	631	2013	100
Halton	232	164	237	633	601	97	158	856	135
Sefton	578	415	610	1602	799	737	738	2274	142
St. Helens	422	289	424	1135	789	669	271	1729	152
Liverpool	1486	1037	1537	4061	2536	2363	2392	7291	180
Knowsley	230	174	244	648	1097	810	499	2406	372
Total				7,445				13,700	184

13. For information, CPRE has called out the Standard Method as it is based on flawed assumptions. No matter how many houses are built there is no reduction in house price. A myth!
14. The Standard Method mandates (except in exceptional circumstances) Office of National Statistic 2014 based data. LCR has internationally significant ecology, which may give rise to exceptional circumstances.
15. The Office of Statistical Regulation has said ONS 2014 data is no longer to inform housing projections as it is predicated on high growth rates, never seen in reality, due to ongoing economic uncertainty. Now there is the Census 2021 data, and ONS updates. CPRE advocates the use of best available data for housing projections in line with best practice.
16. Best available data ought to inform the LCR Strategic Housing and Employment Development Needs Assessment. Using old data inflates the housing and job requirements, needlessly accelerating loss of green fields in countryside.

3. Climate and sustainable development

17. The location of land use and future development directly impacts the scale of greenhouse gas emissions. Urban concentration, reuse of brownfield, and reliance on integrated transport all help to reduce our carbon footprint.
18. We require a modal shift from private to public vehicles. Better still, neighbourhoods should encourage walking and/or cycling to eliminate car dependency. However, growth in LCR appears to be at the expense of a democratic deficit, overly reliant on the private sector investment decisions concerning the port and large-scale logistics buildings at the cost of agricultural land.
19. A more objective sustainable assessment approach with community engagement is recommended to enable ambitions of the public and private sector to be realised in tandem and not at the expense of social and environmental goals.
20. The economic activity from the proposed warehousing is notoriously low-job density employment and results in high levels of road-based HGV movement (in the absence of rail freight) with associated pollution and poor health. A more balanced approach is recommended with value attributed to our rural economy that helps feed our people and supports our hospitality, food and drink sector.
21. Meanwhile, the sub-region has a disproportionately high level of brownfield land lying in an underused and vacant condition, giving rise to poor health and early death. Yet only 33% has permission for development, lower than other sub-regions. An increased brownfield performance would support economic performance of the City Region. See page 3 of the report: <https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/>
22. The LCR SDS should balance aims of Transport for the North to level up the north in terms of connectivity. In the wake of HS2, alternative options should be explored with an option with least harm to countryside, and green infrastructure including peatmoss chosen. North East authorities are already in discussion with Government about transport deals associated with the £12Bn budget, and the North West needs to do the same.
23. In southern areas, 40% of port related container movements are by rail freight. Capacity issues means Liverpool port can only move 4% on rail freight ,and although this has doubled capacity recently, this is still low. Lack of freight on rail leads to unsustainable increases in road based freight, with all the problems of congestion and pollution that follows. A master-planned approach to better inform the integration of

transport is a key role for the LCRSDS in CPRE's opinion. However, to clarify, CPRE remains strongly opposed to a proposed new access road via Rimrose Valley Country Park due to Green Belt and other severe and substantial environmental harms arising. This valuable green space serves an area with poor health statistics and it is vital for health and other social benefits.

24. To ensure for carbon zero development, CPRE encourages sustainable design principles, and requirement of solar PV on residential and commercial roofspace to maximise building energy efficiency. It can help us respond to the climate emergency and cost of living crisis.
25. CPRE is part of the 'Smart Growth Coalition' (<https://smartgrowthuk.org/>) as well as the Rural Coalition. A key part of our vision is a low carbon countryside that mitigates and adapts to the impacts of climate emergency and tackles air pollution.

4. Biodiversity and nature's recovery

26. The Mersey Estuary and nearby coastal areas are internationally significant in terms of biodiversity with several RAMSAR and other equivalent level wildlife designation. Policies in the SDS could require additional Biodiversity Net Gain where justified (see Guildford's policy that seeks more than +10% due to ecological reasons) to reflect the unique Sefton Coast and Wirral Peninsula that is so important for migrating and wintering bird populations. Please see submission of the Wildlife Trust.
27. All new development and infrastructure should support the aims of the Local Nature Recovery Strategy progressed by Merseyside Environmental Advisory Service (MEAS) and be even more ambitious, including plans for a sub-regional park, and require more tree and hedgerow retention and planting with funding available from Government and joint delivery with a range of local partners via Nature Connected the Local Nature Partnership.
28. CPRE supports a brownfield first approach, but in cases where land is of ecological value it may be appropriate for land to be retained for nature or local amenity greenspace. Please refer to the comments of the Wildlife Trust and Wirral Wildlife, which has promoted some excellent rewilding and created a successful butterfly park. When engaging with Greater Manchester Combined Authority on the 'Places for Everyone' Joint Development Plan, CPRE inputted to a partnership project with Natural England and Ordnance Survey. It mapping where there were deficiencies in greenspace to ensure a functioning ecological network would be supported in the future. This mapping helped underpin where development should go so as not to block green corridors.

5. Beauty and heritage

29. CPRE has long campaigned for better designed places to maintain local character and distinctiveness. The SDS should support the local authorities to deliver beauty and protect and enhance the important heritage assets around LCR. CPRE echoes the comments of Civic Voice to ensure the City Region's historic strengths shine through in the place-making of the future and this includes the area's social history.
30. Beyond the scope of the LCR SDS is the payment of VAT when regenerating a building and greenfield development being exempt. This seems fundamentally at odds with the government's policy on heritage and brownfield development. The LCR SDS should promote heritage conservation and the re-use of properties important to the historic fabric.

6. Health and wellbeing

31. CPRE is committed to ensuring the LCR SDS protects and enhances our rural places, for the benefit of all in the future. Our health is inextricably linked to the health of our natural and built environments. We need to encourage more access to nature and green space, and this will be supported through a LCR SDS that focuses on bringing forward development that is balanced in terms of economic, social, and environmental factors.
32. If you require any further information, please do not hesitate to contact me.

Yours sincerely



Jackie Copley MRTPI MA BA(Hons) PgCERT
Planning Director

<u>Page/policy/para</u>	<u>Notes/suggested comments (with recommended changes where applicable)</u>
Page 37 – references to Parkside development, St Helens	<p>CPRE sought to have Parkside in St Helens retained for a Strategic Rail Freight Interchange (SRFI) as per the allocation in the NW Regional Spatial Strategy.</p> <p>CPRE is concerned that the proposed SRFI has been moved to the greenfield area to the east of the motorway and the colliery site itself (Parkside West) which was originally intended to be developed as the SRFI is now being developed for road-based logistics.</p> <p>A success of the local Parkside Action Group and CPRE was to ensure a number of important planning conditions on a range of issues, such as highway safety, landscape, and ecology. All need to be enforced and the latter makes a fantastic test case for the new Office for Environmental Protection, the public body that protects and improves the environment by holding government and other public authorities to account.</p> <p>The SDS should make it clear that there will be no further expansion (beyond what is already allocated) of the Parkside site as a whole or of the road-based logistics within it. This is to protect the remaining areas of Green Belt and to limit the ever-expanding amount of HGV traffic on the road system.</p>
Page 45 – question about the evidence base	<p>See earlier general point re housing numbers. Employment needs forecasting is by its nature uncertain but should be on actual needs of the workforce i.e. the need to ensure numbers of jobs are roughly in balance with labour supply and that due regard is paid to factors such as home working, economic uncertainties etc.</p>
Page 47, Vision	<p>CPRE broadly supports the Vision but would like to see explicit reference to enhancement of the greenspaces and Green Belt to help improve the quality of life of people and nature.</p> <p>Stronger references to biodiversity, with a +10% increase in biodiversity should be in the vision. Liverpool City Region has internationally important ecology and there may be good reason why a more ambitious target should be set. In addition to the Merseyside Environmental Advisory Service (MEAS), please consult with Lancashire and Cheshire Wildlife Trust and also Wirral Wildlife.</p> <p>CPRE is aware of other places having more ambitions, see Guildford example, where Inspector ruled when BNG legislation enacted the local plan could have higher targets than at the national level.</p> <p>Also, "Effective action" to tackle climate change is too woolly. The target of net zero by 2040 (reflected in the objectives) should be part of the vision.</p>
Page 48, Strategic Objectives	<p>CPRE broadly supports many of objectives. Please note, we expect a lot from our greenspace in terms of climate resilience, food production, biodiversity, leisure and recreation and it is under stress.</p> <p>Strategic planning provides an opportunity to better understand and protect greenspace for everyone’s benefit in the future.</p> <ul style="list-style-type: none"> • Objective 1: Tackling climate change and creating a cleaner, greener city region • Objective 2: Reducing health inequalities and creating a healthier city region

Page/policy/para	Notes/suggested comments (with recommended changes where applicable)
	<ul style="list-style-type: none"> Objective 3: Increasing the city region’s economic prosperity in ways that widen opportunities for all Objective 4: The creation of sustainable places and communities with the homes the city region needs Objective 5: Maximising social value from development
Page 53, Spatial Strategy map 4.1	CPRE supports the hierarchy of the spatial geographies as depicted.
Page 54	CPRE supports the policy commitment to focus new development in existing urban areas and on previously developed land, and the Metro Mayor’s expressed determination in the foreword to the Plan to “protect precious greenspace”.
Page 65	CPRE supports the over-arching strategy for the ‘Rural City Region’ as expressed in part 4 of this policy on page 61 and also in paragraph 4.23.
Page 68, Policy LCR SS1 “Liverpool City region Spatial Strategy”	<p>CPRE calls out needless loss of Green Belt and it encourages a hierarchy of site delivery aimed at existing urban centres before bulldozing green fields.</p> <p>Policy LCR SS1 - Liverpool City Region Spatial Strategy does seem to prioritise urban land first with sub section 4. Rural City Region explicitly stating, “Green Belt land will be protected in accordance with national and local policy.”</p> <p>Previously, CPRE supported the local community of Bold and Clockface to oppose the release of Green Belt as the evidence for housing and employment appeared inflated due to reliance on ONS 2014 data and fanciful growth projections in the SHELMA document that have never been borne out in reality. Recent international and domestic events have all caused significant market uncertainty.</p> <p>Welcome clarity that future Green Belt release must be via review of Local Plans. However there needs to be clarity that the housing and employment targets are truly justified and won't lead to un-necessary de facto pressure to release Green Belt.</p>
Section 5. Spatial Priorities	CPRE agrees that the greenhouse gas emissions of the sub-region must be reduced dramatically to help the Government fulfil its international climate change commitments as set out in the Climate Change Act (as amended) and the Environment Act, 2021.
Page.69, Call for Strategic Sites 5.4	<p>CPRE champions the reuse of the significant brownfield land resources of the six local planning authorities in advance of our green fields, as does Government in its National Planning Policy Framework (NPPF), December 2023 Section 11: <i>Making effective use of land</i>.</p> <p>As Merseyside’s Green Belt was expressly designated with the fifth purpose of promoting urban regeneration, so this should be at the forefront of politician’s and planner’s minds.</p> <p>The spatial portrait should recognise that the North West, especially Liverpool has more brownfield land than most of the rest of the country, yet only 33% is permitted</p>

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	<p>for development and this leads to poor brownfield completion performance. See Fig 1 and table 3 of the Brownfield Report 2022. https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/</p> <p>As part of promoting a thriving city region, social conditions and the environment should be enhanced. Deprivation should be addressed, and it is well documented that brownfield land causes high mortality and morbidity and that high quality natural greenspace promotes good health and well-being. People across the Liverpool City Region should have the countryside next door looked after as a central theme of the Spatial Development Strategy.</p> <p>We are celebrating the recent success in Wirral to identify a ‘no Green Belt release’ local plan, which is at examination and the High Court decision not to allow a local developer to challenge the dismissal of its appeal for consent to develop almost 800 homes in the Green Belt in direct opposition to the Council’s regeneration plans. Wirral, like many other parts of the Liverpool City Region has previously used sites lying vacant and derelict and in need of regeneration. We hope the Spatial Development Strategy will prioritise the revitalisation of the Liverpool City and town centres to support levelling-up and reverse the fortunes of the urban areas, in advance of green field allocations. It should not undermine local plan allocations against public opinion and recent decisions of a planning inspector and High Court judge who threw out a legal challenge on proposals to develop Wirral’s Green Belt land.</p>
<p>Page 69, Policy LCR SP1 - Strategic Housing Need and Distribution</p>	<p>The total housing requirement identified is 83,600 houses.</p> <p>Whilst CPRE acknowledges it is important for rural places to have more homes, one in two built should be truly affordable homes, crucially including in perpetuity low-cost social housing.</p> <p>CPRE notes for example that, if the ONS 2018 based household projections were to be used (as opposed to the out-of-date 2014 data used by the national standard method), the actual housing need would be substantially reduced compared to the housing requirement of 4,400 pa dictated by the government policy.</p> <p>CPRE has been critical of the fact that the government’s projections are based on outdated figures and not the latest statistics available. We would also make the point that the amount of housing that can be delivered from windfall development should not be under-estimated.</p> <p>Development in the Wirral must be genuinely local plan led. The SDS Table 5.1 shows 851 dwelling per annum, which significantly exceeds the local plan derived target of 750 dpa based on the Standard Method and use of ONS 2014 data, it is much lower when using ONS 2018 at 688 dpa. The Wirral Green Space Alliance, an umbrella group of 30+ civic groups worked tirelessly with the Council and with the Planning Inspectorate at the Leverhulme Appeal and subsequent Local Plan Examination answering Matters, Issues and Questions of the Examination Panel. The LCR SDS ought not to undermine the local consensus (of all political representatives) and progress achieved.</p>

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	Overall, the quantum of development identified should reflect reality, and we urge for Census 2021 data to be use as it is the best available data. Office of National Statistics (ONS) 2014 based population has been discredited by the Office for Statistical Regulation.
Page 71, Table 5.2 LCR Strategic Housing Sites sets out sites.	CPRE accepts the brownfield sites and allocated sites in local plans. Halsnead Garden Village will have to deliver biodiversity net gain of +10% and it is important the substantial compensations are implemented locally to provide green infrastructure and habitat for displaced wildlife. Sustainable travel and public transport should be integrated into the Garden Village.
Page 81	CPRE question the robustness of the requirement for 521 hectares. Working from home is now the new norm post-Covid and since work on the spatial plan began. According to the Opinions and Lifestyle Survey conducted on behalf of the Office for National Statistics (ONS) in February 2022, 84% of workers who had to work from home during the coronavirus epidemic said they intend to carry on with hybrid working. Whilst around 14% of working adults worked exclusively from home between April 27 and May 8, 2022, 24% engaged in hybrid working – and the percentage of hybrid working continues to rise. https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/ishybridworkingheretostay/2022-05-23 A further survey conducted by the ONS covering the period between September 2022 and January 2023 revealed that 16% of working adults had worked exclusively from home in the previous seven days and 28% had both worked from home and travelled to work. https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/characteristicsofhomeworkersgreatbritain/september2022tojanuary2023 The working-from-home statistics quoted above do not support a case for a high level of need for new employment land. Rather, they support a case for more of the existing employment space and allocated employment land being turned over to other uses.
Page 82, table 5.8	From the figures presented the table title should presumably relate to floorspace and not hectareage requirement? Column 2 should be floorspace for offices and not B2? See also earlier comments re methodology.
Page 88, para 5.38	CPRE supports the finding that no further land needs to be identified for strategic B8. The wording of the last sentence should be stronger in stating there is not a need rather than “there does not appear to be a need”.
Page 98	CPRE supports the intention to improve the public realm, provide adequate affordable housing and to tackle long standing issues of dereliction and land contamination. (We note the comments in paragraphs 5.48 and 5.49 on page 98 in

Page/policy/para	Notes/suggested comments (with recommended changes where applicable)
	relation to the problems and costs of re-using previously used land but urge the Combined Authority to remain steadfast in its aspirations for regeneration).
Page 102 - Map 5.4 Strategic Transport Interventions	<p>Northern Powerhouse Rail identified on diagram but no clear explanation in text about what would be involved etc. The line of NPR shown in the diagram conflicts with the draft SIP (section 10.5) which states that the core of NPR will include a high-speed line from Liverpool to Warrington Bank Quay.</p> <p>CPRE in principle supports moves to improve rail services as a means of reducing reliance on road transport (for passengers and freight). However, the environmental impact of any upgrades must be fully addressed. For example, any works to the Earlestown line could harm Chat Moss (the section of this line nearer Manchester) due to the importance of this area as peatland, both for carbon storage and nature conservation, peatland being an irreplaceable habitat (which should be subject to protections given by NPPF, Dec 2023 para. 186c).</p> <p>CPRE would welcome a strategic land use plan that properly integrates rail and bus services to better connect Liverpool with surrounding cities of Manchester and towns such as Preston in the North and Stoke on Trent and the rest of the Midlands and to the South beyond.</p>
Page 102, Map 5.4 on	<p>The Strategic Transport Interventions are illustrated including a railway line shown for ‘Northern PowerHouse Rail’. This has potential environmental impacts outside of the Liverpool City Region. (See indented comments on Strategic Infrastructure Plan, below).</p> <p>Strategic Infrastructure Plan</p> <p>The current consultation on LCR’s Spatial Development Plan also invited ‘initial engagement’ comments on the Strategic Infrastructure Plan which was published in October 2023. The introductory remarks to the Transport section on page 118 begin promisingly enough with a recognition that a ‘predict and provide’ approach is no longer appropriate, and, on page 119, it sets out five draft goals which CPRE has no problem in endorsing. It then lists the handful of stakeholder groups that were interviewed for the development of the plan. It is worth noting that no environmental stakeholders were involved and nor were any public transport providers or user groups or any representatives of cycling or walking organisations. This being the case, it is unsurprising to note that the transport section then immediately turns to identifying ‘pinch points’ to be addressed on the major road network. These have simply been imported into the spatial plan.</p> <p>There is reference to the LCR adopting a franchising model for buses, which is to be welcomed, and it is also noted that rail patronage has continued to grow since being hit badly due to the Covid pandemic. Cycling is poorly served in the LCR. There is a recognition that there are “currently only a significant lack of strategic cycling routes in the LCR”. However, funding has now been obtained to deliver a cycling and walking plan, along with some rail and bus improvements.</p> <p>The rail improvements listed include ‘Northern Powerhouse Rail’ which the government has been spearheading. According to the plan, “The core network of NPR will include a new high speed line between Liverpool and Warrington (Bank Quay)” (page 139). Whilst CPRE has always been a great supporter of rail travel, it cannot</p>

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	<p>comment on entirely new routes without first seeing detailed drawings and considering their environmental implications.</p> <p>The SIP goes on to make the case for the A5036 Access to the Port of Liverpool (road) scheme. CPRE does not support this scheme which would, in effect, remove the small amount of Green Belt in that area. We support improvements to the rail access to the port – which already exists.</p>
Page 103	<p>Also (linked to the above point), paragraph 5.58 of the explanatory text simply lists the rough locations for all the major developments in all the constituent authorities that make up Liverpool City Region, whether their Local Plans are already adopted or not, in a way which suggests they are all supported regardless of their merits.</p> <p>Basically, the policy is saying that anything deemed to meet identified need, serve new development or enable growth will be welcomed. And this non-specific and magnanimous approach to development that is strategic in scale is not even modified by mitigating statements in the policy about climate change or environmental or social impacts.</p> <p>In fact. This policy stands out as bearing no relation to a number of other policies including Policy LCR DP1 – Planning for Climate Change. As worded, this is a totally unsustainable and clearly unacceptable over-arching approach to strategic infrastructure.</p>
Page 104 Policy LCR SP4 – Strategic Infrastructure	<p>This is something of a catch-all policy which encompasses and endorses virtually all types of major infrastructure and a way that it is not fit for purpose.</p> <p>Part of the policy lists “Improvements to the Key Route and Major Road Networks”.</p> <p>Paragraphs 5.65 and 5.66 go on to explain, the Key Route Network covers all roads within the Primary Route Network that form a continuous network between primary destinations – and includes two Mersey Tunnels and the Silver Jubilee Bridge – and the Major Road Network includes both the Strategic Road Network and important local roads.</p> <p>The road junction improvements listed are all aimed at facilitating more traffic movements, with all the environmental implications that come with them.</p>
Policy LCR SP6 – Green and Blue Infrastructure & Policy LCR SP10 – Rural City Region	<p>Policy LCR SP6 on Green and Blue Infrastructure on page 111 lists the fact that “Green corridors and Greenways, including paths and cycleways” exist and Policy LCR SP10 on the Rural City Region on page 126 (bullet ‘e’) commits to “protecting and enhancing the public rights of way network”. However, neither make a promise – as they should – to developing a network of greenways (off-road routes between settlements) and quiet lanes (on-road routes which give priority to walkers, joggers, cyclists and horse riders). Also, the importance of conserving tranquillity where it exists, is not mentioned in either policy.</p>
Policy LCR SP7 - International Connectivity	<p>There is no recognition either within the policy or in the supporting text that air travel is the most polluting form of transport or that shipping is also a major polluter. Instead, there is an acceptance of the need to “accommodate [the] future growth” of</p>

Page/policy/para	Notes/suggested comments (with recommended changes where applicable)
	international connectivity from an economic perspective, but no balancing statement about air and water pollution or the fact that airports and shipping ports generate huge amounts of road traffic. Also, map 5.7 on page 117 features an unexplained flag to a “Regional link to Manchester Airport”.
Policy LCR SP8 - River Mersey and the Coast	<p>The implications of clause b) (tidal energy) need to be examined/enlarged upon as more details of this become known.</p> <p>Bullet (a) on page 119, ignores the unsustainability of the National Highways proposed road through the Rimrose Valley, i.e. the A5036 Access to the Port of Liverpool scheme.</p> <p>Paragraph 5.97 of the supporting text here does acknowledge the fact there have been and are water quality issues with the River Mersey, but only in relation to untreated sewage discharge – not to the use of fossil fuels by (and discharges from) ships.</p>
Page 121, para 5.96	CPRE supports the objective of mitigating recreational impacts on the coast. However, it is doubtful whether the impacts of the scale of housing development proposed can ever be fully addressed. This forms another reason to avoid excessive levels of housing development e.g. in Wirral.
Policy LCR SP10 - Rural City Region	<p>CPRE broadly supports this policy. Wording of clause g) (re BMV farmland) should be strengthened to make it clear that development of such land for other uses will only be allowed where the development would bring compelling benefits which cannot be met by developing brownfield or lower grade land.</p> <p>This policy should also say something about protection of dark skies in rural areas e.g. from inappropriate lighting.</p>
Policy LCR DP2 - Sustainable and Inclusive Communities	CPRE supports this policy including the provision of affordable housing. CPRE is campaigning nationally for the definition of affordable housing to be linked to local income levels instead of a percentage of market value (which is often still unaffordable for many people in need). This point should be addressed in the policy.
Page 147, para 6.44	CPRE supports the reference to food security in para. 6.44. However, this should also be reflected in policy LCR DP3 para d iii) which currently only refers to rural diversification.
Policy LCR DP5 - Impacts on Health	<p>CPRE welcomes this policy as a whole. however, light pollution (clause c) is an issue in its own right in the effect it has on rural landscapes i.e. it is not just linked to health and should therefore be dealt with in the broader policy on rural areas.</p> <p>Air quality must improve in LCR and this can be supported by better integration of sustainable travel infrastructure to serve new development. We must plan to reverse car dominance and live healthier lives. Too many people suffer from respiratory disease and early death in the City Region and there is real health inequality and disparity between poorer and more affluent areas, some 12 years difference in life span in the urban port side areas of Birkenhead compared to Irby and this deprivation</p>

Page/policy/para	Notes/suggested comments (with recommended changes where applicable)
	should be challenged through serious regeneration and defence of the Green Belt, which acts as a green lung.
Policy LCR DP7 - The Natural Environment and Nature Recovery	CPRE supports this policy as a whole. On clause k) where trees are lost, they should be replaced on at least a 3 for one basis due to risk of losses in establishment stage of new planting.
Policy LCR DP10 – Sustainable Transport and Travel	Most of the wording of the Sustainable Transport and Travel policy is supported and so are the key goals for the Local Transport Plan 4. However, the impression gleaned is that this policy (and the Climate Change policy) were written in isolation from Policy SP4 on Strategic Infrastructure.
Policy LCR DP11 - Energy	<p>Even though many LCR areas have recently adopted local plans, regrettably they do not have good planning policies concerning the achievement of solar energy from roof mounted solar PV. A helpful policy would be to encourage the retrofitting of all property and mandating of solar on rooftops on all domestic and commercial property. Especially large logistics sheds such as Parkside and Omega. A real missed opportunity to ensure benefits were secured through policy and planning condition.</p> <p>This would help the Mayoral ambition to maximise green investment and jobs and help decarbonise the city region.</p> <p>Re wind farms and solar parks - Clause a) should also reference protection of best and most versatile (BMV) agricultural land and food security given the impact that proposals for solar farms and wind turbine arrays can have on these. BMV land should only be lost in the most exceptional cases – see earlier comments. Also, restoration conditions should be required to restore land to a better condition post use, and that greenfield sites ought not be considered previously developed, as per the glossary of NPPF.</p> <p>Where wind farms or solar arrays are permitted, they should be subject to strict conditions and/or financial provisions to ensure the land will in practice be properly restored.</p> <p>It is understood that at the Port of Liverpool there are plans to repower the wind turbines. CPRE welcomes a more sustainable master-planned approach to make the Port more sustainable concerning energy and this should be applied to solutions to convey containers out of the port on rail.</p>