

Appendix A

WLBC Comments on emerging Liverpool City Region Spatial Development Strategy

Please note that the online consultation platform is set up such that comments must be made on each element individually, although, in addition to the online responses, a covering email can be sent to the LCRCA with all of the Borough Council's representations collated in one document.

General comment

West Lancashire Borough Council is supportive of the Revised Draft Liverpool City Region Spatial Development Strategy (SDS) and raises no objections under the Duty to Co-operate. This is based upon the fact that the SDS does not suggest that West Lancashire should meet any of the LCR's housing or employment land development needs. Furthermore, as the SDS is developed, the Council would ask that the proposals for the Skelmersdale Rail Link, which stands to benefit both West Lancashire and authorities within the LCR, is referred to as a priority transport proposal in the SDS, alongside other major transport proposals within the LCR.

Vision

West Lancashire Borough Council supports the proposed Vision. Achieving this Vision should have positive knock-on effects beyond the SDS area, including in West Lancashire. In particular, West Lancashire Borough Council supports the provision of homes to meet all of LCR's needs (bullet point 6).

It is presumed that, in order to enable progress to be evaluated against the present situation, the baseline and suitable indicators to measure achievement will be set out as part of the work on the SDS. This comment also applies to the Objectives.

Objectives

Objective 1 Climate Change and a greener City Region

As with West Lancashire Borough Council's comment on the Vision, it is presumed that the baseline position will be measured, and that suitable indicators will be developed to evaluate how well this and the four other objectives are being achieved.

West Lancashire Borough Council supports this first objective. Addressing climate change is a top priority in all areas, as is protecting and improving the natural environment.

Objective 2 Health & Wellbeing

West Lancashire Borough Council supports this objective. Addressing health inequalities and improving health and wellbeing is also a priority for this Council.

Objective 3 Inclusive Economy

West Lancashire Borough Council supports this objective. A flourishing economy within the SDS area should have positive knock-on effects for neighbouring areas such as West Lancashire. Consideration could perhaps be given to mentioning in the policy that benefits extend beyond the LCR boundaries.

Objective 4 Placemaking & Communities

West Lancashire Borough Council supports this objective. Providing the right homes to meet LCR's needs in full should help reduce development pressure in West Lancashire.

Objective 5 Social Value

WLCB supports the consideration and maximisation of social value in development.

Suggested Policy Approaches

1 Natural Environment & Green Infrastructure

West Lancashire Borough Council supports this proposed policy approach. Biodiversity considerations extend beyond local authority boundaries and enhancement of one area should have positive effects in neighbouring areas (and vice versa).

Biodiversity and Green Infrastructure 'shared' by West Lancashire and the LCR includes assets such as the Leeds Liverpool Canal, as well as migratory birds and the places they utilise (Martin Mere / Ribble Estuary and the Sefton Coast); it is hoped that co-ordinated work between the different authorities can take place on protecting and improving these shared assets.

Similarly, with flood risk, some of the areas at higher risk of flooding in the Liverpool City Region border with West Lancashire, and a strategic approach to water management, flooding and flood risk that involves or takes account of West Lancashire would be welcome.

2. Energy & Resources

West Lancashire Borough Council supports this proposed policy approach. Carbon reduction is a priority for all areas, as is conservation of mineral and water resources; good practice in one area should have positive effects in neighbouring areas.

3. Air Quality

West Lancashire Borough Council supports this proposed policy approach.

As far as is possible within the remit of planning policy, consideration could be given to exploring what proactive steps could be taken to improve air quality (i.e. in addition to requiring Air Quality Impact Assessments and mitigation measures), for example provision of additional Green Infrastructure.

4. Active Travel

West Lancashire Borough Council supports this proposed policy approach. It is hoped that any walking and cycling network and Green Infrastructure networks in the Liverpool City Region can align with those in West Lancashire wherever possible (e.g. medium to long distance footpaths and cycle routes).

5. Health Impact Assessments

West Lancashire Borough Council supports this proposed policy approach. Depending on the timescales for preparation of the SDS and local plans in West Lancashire and the LCR, it may be possible to consider aligning approaches towards health impact assessment of local plans and / or proposed developments.

For proposed developments close to the LCR border (including with West Lancashire), the policy should require that health impacts that extend beyond the border be assessed / taken into account.

6. Healthy Food Businesses

West Lancashire Borough Council supports this proposed policy approach. It is recognised, however, that limiting hot food take-aways near schools and other places where young people congregate is just one measure amongst many needed to tackle obesity.

7. Social Infrastructure

West Lancashire Borough Council supports this proposed policy approach.

8. Employment Skills

West Lancashire Borough Council supports this proposed policy approach. It is hoped that, whilst LCR residents are understandably to be given preference in apprenticeships, West Lancashire residents would also be able to benefit from these opportunities where appropriate, given the relatively high levels of commuting between the LCR and West Lancashire.

9. Digital Connectivity

West Lancashire Borough Council supports this proposed policy approach. It is hoped that provision of top specification digital connectivity in the LCR can be extended to neighbouring areas such as West Lancashire and that the policy could refer to "LCR and beyond" when discussing digital infrastructure.

10. Social Economy

West Lancashire Borough Council supports this proposed policy approach.

It is presumed that 'new social economy uses' will be defined.

11. Rural Economy

West Lancashire Borough Council supports this proposed policy approach. Similar to the LCR, West Lancashire has some of the best and most versatile agricultural land in the country, including a high proportion of the North West's Grade 1 agricultural land. This Borough is / should continue to be a vital local partner in terms of food security and reducing food miles.

If the LCR is committed to meeting its own housing needs in full (as set out in the proposed Vision), this should reduce pressure to use prime agricultural land in West Lancashire for housing development. (It is acknowledged that housing figures and distribution are to be addressed in a forthcoming iteration of the draft SDS.)

12. Design Quality

West Lancashire Borough Council supports this proposed policy approach. There may be scope for sharing of good practice / policy on design between the LCR and West Lancashire Borough Council, depending on the relative progress of different authorities' local plans and the SDS. It is acknowledged that guidance may also be issued by central government.

The policy would benefit from including design for low energy use for homes and businesses, to tie in with Policy Approaches 2 and 13.

13. Housing Standards

West Lancashire Borough Council supports this proposed policy approach. Provision of good quality, suitable, 'healthy', resource-efficient and climate resilient homes is as important as the actual numbers of dwellings delivered.

This policy area is likely to link with the Design Quality policy area (12).

If appropriate, this policy area could also give consideration to the upgrading of existing building stock, although it is recognised that this topic falls largely outside the remit of planning.