



REPORT TITLE:	TOWARDS A SPATIAL DEVELOPMENT STRATEGY FOR THE LIVERPOOL CITY REGION UP TO 2040 – WIRRAL RESPONSE
REPORT OF:	THE CHIEF PLANNER

REPORT SUMMARY

The Liverpool City Region Combined Authority (CA) has consulted on a document “Towards a Spatial Development Strategy for the Liverpool City Region up to 2040” as part of the process of preparing a Spatial Development Strategy (SDS) for the Liverpool City Region (LCR). Preparation and adoption of the SDS is a requirement of the LCR devolution deal. Once adopted, potentially in 2025, the SDS will provide a strategic planning framework for the future development and use of land in the city region to 2040. The SDS must only deal with planning matters that are of strategic importance to the Liverpool City Region. Once adopted the SDS will form part of the development plan for Wirral and for the other local authorities in the City Region. As such it will form part of the policy framework for assessing planning applications in Wirral. However, the SDS will not allocate new sites for development and nor will it be a mechanism for amending existing Green Belt boundaries, which will remain matters for the Wirral Local Plan. This report summarises the content of the consultation document specifically, the proposed draft policies and sets out the Council’s suggested response.

The LCR SDS once published could potentially support delivery under the themes of people focused regeneration; protect the environment; and safe, resilient and engaged communities in the Council Plan: Wirral Working Together 2023-27,

This is a non-statutory consultation and any formal decision on the Spatial Development Strategy will be a matter for the Liverpool City Region Combined Authority. However, it is a key decision as the SDS has the potential to affect all Wards.

RECOMMENDATION/S

The Director of Regeneration and Place is recommended to approve and note the Council’s response to the consultation by the Liverpool City Region Combined Authority on the emerging Spatial Development Strategy for the Liverpool City Region as set out in Appendix 1 to the accompanying report.

SUPPORTING INFORMATION

1.0 REASON/S FOR RECOMMENDATION/S

- 1.1 The Liverpool City Region Combined Authority (CA) has consulted on the latest stage of preparation of what will become on adoption the Liverpool City Region Spatial Development Strategy (SDS). This will become part of the statutory Development Plan for Wirral and inform decisions on planning applications. The consultation period ran from November 2023 until February 2024. Due to ongoing work connected with the examination of the Wirral Local Plan, the CA has agreed that the Council's response can be submitted after the deadline for comments, given that this is a non-statutory stage in the process. The recommendation seeks approval for the Council's response, which is set out in Appendix 1 to this report, to the consultation by the CA on the emerging SDS.

2.0 OTHER OPTIONS CONSIDERED

- 2.1 The only other option is not to submit a response to this consultation. However, as the Liverpool City Region Spatial Development Strategy will become part of the Development Plan for Wirral on adoption, not responding to this consultation could mean that the Council's position is not fully reflected in the Spatial Development Strategy.

3.0 BACKGROUND INFORMATION

- 3.1 Preparation and adoption of the Liverpool City Region (LCR) Spatial Development Strategy (SDS) is a requirement of the LCR Devolution deal. Responsibility for preparation of the SDS lies with the Liverpool City Region Combined Authority (CA). The SDS will provide a strategic planning framework for the future development and use of land in the city region to 2040. The SDS must only deal with planning matters that are of strategic importance to the Liverpool City Region. These matters may not necessarily affect all districts but will have significance for the wider interests of the City Region.
- 3.2 Legally, the SDS must have regard to:
- National planning policy, set out in the National Planning Policy Framework;
 - The health of people in the Liverpool City Region and health inequalities;
 - Achieving sustainable development;
 - Climate change and its consequences; and
 - The need to be consistent with national policies and relevant EU policies and obligations.
- 3.3 The SDS will address planning for homes, the economy and jobs, infrastructure and the natural environment underpinned by a range of evidence to support the proposed policy approach, and a Strategic Infrastructure Plan, which will identify key pieces of strategic infrastructure to support delivery. The SDS is subject to: an 'Integrated Impact Assessment', so that any impacts of the proposed policies on sustainability, health, equality and crime prevention are fully taken into account; a Habitats Regulations Assessment; and a 'Social Value Evaluation' to make sure that policies take account of wider community benefits and social aspects. The LCR SDS aims to

align to the objectives of other CA strategies and initiatives such as the 2022 LCR Plan for prosperity.

- 3.4 The two previous stages of consultation on the SDS are summarised in section 8 of this report. The third and current stage of public engagement on the SDS is broadly akin to a Regulation 18 Local Plan 'preferred options' consultation, albeit being non-regulatory. It is entirely separate from and should not be confused with, the ongoing Examination of the Wirral Local Plan. It is intended that the feedback and responses received from this consultation will be considered when a final submission draft version of the SDS - the version the Combined Authority wishes to take forward - similar to the Regulation 19 stage of the Wirral Local Plan - is prepared. The consultation document makes clear that whilst in some cases a 'preferred' policy approach is being proposed, nothing being presented at this stage is final. The consultation period ran from November 2023 until February 2024. Due to ongoing work connected with the examination of the Wirral Local Plan, Combined Authority officers have agreed that the Council's response can be submitted after the deadline for comments, given that this is a non-statutory stage in the process.
- 3.5 Once approved the SDS will form part of the statutory Development Plan for Wirral (and for the other local authorities in the City Region). As such it will form part of the policy framework for assessing planning applications in Wirral.
- 3.6 The SDS will not allocate new sites for development and nor will it be a mechanism for amending existing Green Belt boundaries. The Council will remain responsible for allocating sites through its Local Plan to meet its housing, employment and other needs and will continue to make decisions on planning applications but will need to take the policies in the SDS into account in these decisions. As with the Wirral Local Plan, the SDS will need to be read 'as a whole' with all relevant policies considered and balanced by the decision maker. In line with national policy, the SDS will need to be reviewed at least every 5 years.

Evidence Base

- 3.7 To inform SDS policy, the CA commissioned Icen Projects to prepare a LCR Strategic Housing and Economic Development Needs Assessment ("HEDNA"). The HEDNA provides objective evidence on the need for housing, economic growth and employment land across the City Region up to 2040. Icen have also prepared a LCR Strategic Housing and Employment Land Study ("SHELS") and a LCR Strategic B8 Land Use Forecasts Paper. The SHELS identifies the baseline 'committed' supply of land for housing and employment and its potential capacity on a city region scale up to 2040. The Strategic B8 Land Use Forecasts Paper supplements the HEDNA and provides modelling and analysis of the need for strategic B8 development for warehouse and distribution units of over 9,000 square metres across the City Region up to 2040. Work on the HEDNA, SHELS and Strategic B8 Land Use Forecasts Paper has been guided and informed by a steering group comprising CA and LCR local planning authority officers.
- 3.8 Additional evidence studies published alongside the consultation document include an LCR Strategic Flood Risk Assessment (SFRA) prepared by JBA Consulting, Initial Draft Strategic Infrastructure Plan prepared by Arup, a Town Centre Network and Hierarchy Review produced by TetraTech and a Viability Information paper prepared

by Keppie Massie. Other reports address Social Value, Biodiversity, Natural Capital and Health.

The SDS Consultation Document

- 3.9 Section 1 of the consultation document comprises an introductory section about the engagement and the SDS and its preparation, while Section 2 provides background on the Liverpool City Region and the other Combined Authority strategies and initiatives it seeks to align with such as the 2022 LCR Plan for Prosperity. The remainder of the consultation document comprises four main sections: – Section 3 - Vision and Objectives; Section 4 Draft Spatial Strategy, Section 5 Spatial Priorities and Section 6 Development Principles. There are 60 consultation questions, the majority of which ask the respondent to indicate on a scale of 1-5 the extent to which they agree with the policy approach, followed by a supplementary question which asks how the policy could be improved. There is a separate question seeking views on the evidence base, and some additional questions on housing need and distribution.

Section 3: Vision and Objectives

- 3.10 This section presents a picture of the City Region in 15 years' time and setting out clearly what the SDS aims to achieve, responding to the key issues faced in the LCR. The five themed objectives, as introduced at the previous engagement stage are:
- Objective 1: Tackling climate change and creating a cleaner, greener City Region
 - Objective 2: Reducing health inequalities and creating a healthier City Region
 - 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; and
 - Objective 5: Maximising social value from development

Under each objective is a list of the potential actions needed to achieve it.

Section 4: Draft Spatial Strategy

- 3.11 This section of the consultation document sets out a proposed strategy for the spatial development of the City Region to accommodate future growth needs and meet wider economic social and environmental objectives. The consultation document identifies four spatial areas in the LCR; Liverpool City Centre; an Inner Urban Area which has the most immediate and direct links to the city centre; a Wider Urban Area, which comprises the remaining urban areas within the LCR; and the Rural City Region, which comprises those areas outside of the urban conurbation. In line with the principles of the SDS, these areas are defined only in diagrammatic form with 'fuzzy' boundaries.

Spatial Strategy Policy LCRSS1

- 3.12 This is a lengthy policy which sets the context for what follows. It states that development, including the provision for a minimum of 83,600 new homes and a minimum of 521 hectares of employment land between 2021 and 2040, will be directed to sustainable locations. It proposes that development will be focussed on Liverpool City Centre, the Inner Urban Area and the Wider Urban Area. Liverpool City Centre is anticipated to continue its essential role as primary centre and major hub for key economic growth sectors including the knowledge economy, financial and professional services, creative and digital industries, retail and leisure, tourism and the cultural/ visitor economy.
- 3.13 The Inner Urban Area is stated to include Birkenhead and Bootle as a focus for sustainable regeneration, benefitting from proximity to Liverpool City Centre and complementing the wider city region. Inner Urban Neighbourhoods are also identified, which are intended to capitalise on the benefits of their location within the Inner Urban Area close to the City Centre, Birkenhead and Bootle. A key priority for Inner Urban Neighbourhoods will be to attract investment exploiting the competitive advantages of their strategic location, including the potential for the creation of new businesses from positive spill over from the City Centre and elsewhere in the Inner Urban Area, and providing supply chain and support services. Specific locations referenced within Wirral are Tranmere, Egremont, Seacombe and Poulton. Targeted regeneration and investment will also be supported in other district and local centres.
- 3.14 Policy LCRSS1 states that the Wider Urban Area is also intended to play a key role in sustaining economic growth across the City Region. The sustainable development of key strategic housing and employment sites and strategic infrastructure projects in this Area will complement and capitalise on the growth of the City Centre and the Inner Urban Area. Specific locations within the Wider Urban Area referenced within Wirral are Liscard and New Brighton, identified as key priority areas for economic development and regeneration and New Ferry.
- 3.15 Policy LCRSS1 proposes that the vitality and vibrancy of the Rural City Region, which in practice will be the Green Belt in Wirral, will be maintained and enhanced. Support for rural economic development and diversification, providing opportunity, improving access to high quality services and sustaining and enhancing the natural, historic and cultural environment, are identified as key priorities for the Rural City Region. Green Belt land will be specifically protected in accordance with national and local policies.

Section 5: Spatial Priorities

- 3.16 This section presents draft policy approaches to address key, priority planning matters in the City Region. Their closest equivalents in the Wirral Local Plan are the “WS” strategic policies, but the SDS policies, other than SP1 and SP2, are at a higher level, generally without the Wirral-specific elements found in the Local Plan.

Policy LCR SP1 - Strategic Housing Need and Distribution

- 3.17 Policy LCRSP1 states that a minimum of 83,600 net additional dwellings should be delivered within the Liverpool City Region over the period 2021-2040, or an annual average of around 4,400 net dwellings.
- 3.18 Table 5.1 on page 70 sets out the distribution and indicative phasing of new housing development. In Wirral's case the SDS takes the annual requirement from the Regulation 19 Draft Wirral Local Plan of 835 dwellings up to 2035, with a reduced figure of 784 between 2035-40. The total average per annum between 2021-2040 for Wirral is stated to be 821 dwellings.
- 3.19 Table 5.2 on page 71 lists LCR Strategic Housing sites across the City Region. The Wirral sites listed are Wirral Waters, Hind Street and D1 Oils. The dwelling capacities are, again, taken from the Regulation 19 Draft Wirral Local Plan capacities.
- 3.20 Two key supporting evidence documents commissioned to inform this consultation document are the LCR Strategic Housing and Employment Land Study (SHELS) (2023) and the LCR Strategic Housing and Economic Development Needs Assessment (HEDNA) (2023).
- 3.21 The SHELS sets out the baseline supply position of land for housing and employment across the City Region as of 1st April 2021. The 'committed' housing supply includes sites with planning permission, sites with a resolution to grant planning permission and sites which are allocated in Local Plans or proposed for allocation in draft Local Plans at an advanced stage. A 'committed' supply of 11,285 dwellings is identified in Wirral, contributing to an LCR total of 76,269 dwellings between 2021 and 2040 as set out in table 5.4, page 77. The non-committed housing supply includes sites which are not allocations or proposed allocations in existing or emerging Local Plans, which do not have planning permission or a resolution to grant planning permission. An indicative potential supply of 2,069 dwellings is identified for Wirral, contributing to an LCR total of 25,080 dwellings between 2021 and 2040.
- 3.22 Paragraph 5.17 of the consultation document states that an annual LCR 5-year Housing Supply requirement of 4,607 dwellings has been calculated for the time period 1st April 2022 to 31st March 2027, based on the housing need set out in Policy LCRSP1 and Table 5.6. The SHELS and recent constituent local authorities housing evidence base documents indicate that there is in excess of a 5-year housing supply across the city region for the 2022-2027 time period.
- 3.23 Paragraph 5.4 in the preamble to Policy SP1 states that the CA is interested in understanding if there are any other strategic sites or locations that should be considered for identification through this SDS and potentially future SDSs. This includes possible strategic sites or locations for housing, economic development or green infrastructure.
- 3.24 The other key document is the LCR Strategic Housing and Economic Development Needs Assessment, HEDNA, 2023. The HEDNA shows that for Wirral, the demographic evidence points towards a lower level of housing need than the Government's national standard method, with all scenarios falling broadly within that

already provided for in the emerging submitted Wirral Local Plan, of 835 dwellings per annum.

- 3.25 Consultation Question 6 asks respondents to give a view on two approaches, or on an alternative option they may wish to put forward to ensure that enough homes are provided across the LCR over the plan period, with responses to be justified and supporting evidence referenced. The two options are:
- Approach a – Set a housing requirement that mirrors the City Region’s Local Housing Need calculated using the Government’s national standard method; or
 - Approach b – Set a housing requirement higher than the City Region’s Local Housing Need calculated using the Government’s national standard method.

Policy LCR SP2 - Strategic Employment Land Need and Distribution

- 3.26 In relation to employment land, based on the findings of the HEDNA 2023, the SDS consultation document identifies an employment land objectively assessed need across the LCR for general industrial uses of 521ha, and for office and research and development uses of 281,600 square metres from 2021 up to 2040 including a five-year buffer to provide choice and flexibility. The HEDNA takes into account the increase in home and hybrid working on the likely demand for office floorspace.
- 3.27 Disaggregated to district level, Table 5.7 on page 82 of the SDS consultation document proposes a requirement of 40.3 hectares for general industrial uses in Wirral over the SDS period and Table 5.8, also on page 82, identifies a requirement for offices in Wirral of 17,300 square metres and 8,200 square metres for R&D. Strategic Employment sites within Wirral identified in Table 5.9, on page 83 of the consultation document, are Northside and Wirral Waters and the land areas quoted are set out in the submitted Wirral Local Plan. Paragraph 5.42 states that the pipeline of employment sites identified in the SHELS is collectively sufficient to meet the identified future employment land needs up to 2040.
- 3.28 The Strategic B8 need for warehouse and distribution units of over 9,000 square metres is only presented at an LCR level. Paragraph 5.37 on page 87 of the consultation document identifies a need for 293- 343 hectares of land from 2021 to 2040 including a five-year buffer to provide for choice and competition. An analysis of the existing pipeline supply of Strategic B8 sites identifies no sites in Wirral and as summarised in Table 5.11 on page 89 of the consultation document amounts to 359 hectares suggesting that there will be no need to identify further land at the current time for strategic B8 development across the City Region. In relation to general employment, the pipeline of sites is stated to be sufficient to meet assessed needs over the SDS plan period.

Other Strategic Policies

Policy LCR SP3 - Brownfield Deliverability and Regeneration

- 3.29 Policy LCR SP3 emphasises the prioritisation of brownfield/previously developed land to meet development needs and lists the implementation tools such as Brownfield Land Registers and grant funding. High priority should be given to the

sustainable development of brownfield land that is well connected by planned and existing public transport and active travel routes, particularly in and surrounding urban centres and in areas of significant deprivation.

Policy LCR SP4 - Strategic Infrastructure

- 3.30 Policy LCR SP4 indicates support for key strategic infrastructure to meet identified needs subject to other SDS and district Local Plan policies – primarily related to enhancements to utilities and transport infrastructure. No strategic transport interventions are identified for Wirral on the accompanying Map 5.4 on page 102 of the consultation document.
- 3.31 An Initial Engagement Strategic Infrastructure Plan (SIP) is also published for comment alongside the SDS. The SDS indicates, based on the SIP, that there are no significant shortfalls in strategic infrastructure provision which would prevent delivery of the SDS in the first 10 years of the SDS. However, the SIP does identify potential infrastructure capacity gaps in achieving growth objectives of the SDS in the later stages of the SDS period, specifically in relation to transport, although none of the Strategic Highway locations shown on Map 5.5 on page 106 of the consultation document, identified as potentially coming under pressure and requiring intervention, are in Wirral. The need for a significant uplift in the infrastructure provision for hydrogen and electric vehicles is identified by the SIP as key to enabling the decarbonisation of the LCR's transport network.

Policy LCR SP5 – City and Town Centres

- 3.32 The Town Centre hierarchy listed in the SDS mirrors that in the submitted Wirral Local Plan, down to town centre level. Boundaries and allocations to meet identified needs will continue to be defined through district Local Plans. District, local and smaller centres are not listed in the SDS and are left for district Local Plans to define.

Policy LCR SP6 - Green and Blue Infrastructure

- 3.33 Policy LCR SP6 lists the key elements of the LCRs multifunctional network of green and blue infrastructure – parks, open spaces, the coast, green corridors and so forth. It sets out an overarching strategic approach to planning positively for green and blue infrastructure in recognition of its importance to the quality of places. Paragraph 5.81 of the consultation document notes that Local Plans will continue to provide the basis for open space standards and determining appropriate new or enhanced green infrastructure provision or the acceptance of any loss and replacement, in light of local circumstances.

Policy LCR SP7 - International Connectivity

- 3.34 Policy LCR SP7 relates to the airport and maritime assets in the City Region plus the Freeport, with their sustainable growth supported subject to other relevant SDS policies with regard to mitigating climate change and achieving net zero, addressing impacts on the natural and historic environment and local communities and supporting inclusive economic growth.

Policy LCR SP8 - River Mersey and the Coast

- 3.35 Policy LCR SP8 outlines a range of key strategic planning measures and approaches in the interests of ensuring that development contributes towards the long-term sustainability of the River Mersey and the coast. A number of measures are identified, including renewable tidal marine energy, regeneration of coastal areas, nature conservation, managing recreational pressure, water quality, flood risk and coastal protection. The supporting text references the Mersey Tidal Power Project in paragraph 5.93 of the consultation document.

Policy LCR SP9 - Culture, Tourism and Visitor Attractions

- 3.36 Policy LCR SP9 sets out an overarching approach to planning positively for tourism, cultural and visitor attractions in the City Region in recognition of their role and significance. It also seeks to ensure this is achieved in a sustainable way and that any impacts, including on the environment, heritage assets are managed or mitigated. The 'agent of change' principle should be applied to help secure the long-term future of cultural assets and activities.

Policy LCR SP10 - Rural City Region

- 3.37 Policy LCR SP10 sets out an overarching strategic approach for rural parts of the City Region in recognition of the issues relevant to these areas, consistent with national planning policy. Priorities identified for rural areas are:

- Supporting a prosperous rural economy;
- Maintaining the vitality and viability of rural communities;
- Improving accessibility to rural areas;
- Protecting the Green Belt;
- Respecting landscape character and heritage;
- Protecting agricultural land and improving soils;
- Responding to climate change; and
- Improving digital connectivity.

Section 6: Development Principles

- 3.38 The second half of the SDS engagement document, from page 130 onwards, sets out "Development Principles" which are high level, strategic theme-based policies to be applied in decision and plan making, with district Local Plans (and other relevant Development Plan Documents) providing further details on implementation. The Development Principles are similar to the Strategic WS Policies in the emerging Wirral Local Plan and they are presented as initial draft proposed policy approaches for the purposes of gaining feedback.

Policy LCR DP1 – Planning for Climate Change

- 3.39 Policy LCR DP1 aims to embed measures to mitigate and adapt to climate change at an early stage in the planning process. It seeks to ensure climate change considerations, particularly the reduction of carbon dioxide, are central when making

plans and taking decisions in the City Region. The supporting text references the CA's "Liverpool City Region Pathway to Net Zero" and the "5 Year Climate Action Plan 2023-2028" agreed in July 2023.

Policy LCR DP2 - Sustainable and Inclusive Communities

- 3.40 Policy LCR DP2 aims to ensure that a variety of house types, sizes and tenures will be available across the City Region to contribute to the establishment and maintenance of balanced communities and to meeting the differing needs of a wide range of people. Suggested housing mixes are set out in Tables 5.1-6.4 on pages 122 to 124 of the consultation document, derived from the findings of the HEDNA 2023.
- 3.41 Paragraph 6.28 of the consultation document notes that "it is recognised in the HEDNA that Local Plan evidence will reflect a more fine-grain assessment taking account of specific factors which the strategic level assessment in the HEDNA does not. As a result, where up-to date local housing needs assessments indicate an alternative mix should be followed, those should represent the starting point for plan-making and decision-taking with due regard to the conclusions in this strategic assessment."

Policy LCR DP3 - Economic Prosperity

- 3.42 Policy LCR DP3, alongside Policies LCR SS1 and LCR SP2, seeks to help deliver the Liverpool City Region Plan for Prosperity issued in 2022. In addition to the provision of employment land to meet the identified needs in LCR SP2, it intends to support key sectors of the LCR Economy, clustering and the delivery of shared prosperity.

Policy LCR DP4 - Promoting Health and Wellbeing

- 3.43 Policy LCR DP4 seeks as a priority that development plans and proposals should plan positively to reduce health and wellbeing inequalities and allow for healthy and active lifestyles to be led. It includes a requirement that development proposals defined as of 'potential strategic importance' should be informed and accompanied by a Health Impact Assessment. Supporting text paragraph 6.47 notes that addressing poor health and health inequalities across the City Region is also a requirement of SDS legislation.

Policy LCR DP5 - Impacts on Health

- 3.44 Policy LCR DP5 aims to ensure that adverse impacts on human health are avoided or mitigated. It covers air quality, risks to health arising from flood risk, coastal change, land instability and contamination, amenity, and the agent of change principle. Paragraph 6.60 of the supporting text references the LCR Air Quality Action Plan.

Policy LCR DP6 - High Quality Design

- 3.45 Policy LCR DP6 aims to ensure that development plans and proposals should deliver well designed and high-quality buildings and places that are attractive,

inclusive, healthy, safe, and environmentally sustainable, while responding positively to local character and distinctiveness, including townscape and landscape, and its wider setting and building safety. The policy encourages measures that help mitigate and adapt to climate change.

Policy LCR DP7 - The Natural Environment and Nature Recovery

- 3.46 Policy LCR DP7 sets out a strategic approach to planning for the natural environment and recovery of nature in response to the issues faced in the City Region consistent with relevant legislation, national planning policy and guidance, including Internationally designated sites, the requirements of biodiversity net gain and the forthcoming Local Nature Recovery Strategy.

Policy LCR DP8 - Making the Best Use of Land

- 3.47 Policy LCR DP8 seeks to prioritise the use of sustainable brownfield/previously developed and underutilised land to accommodate future needs for housing and other uses, including the consideration of higher density uses. It also recognises that some brownfield/previously developed land in the City Region may be most effectively used for other sustainable functions or uses such as green and blue infrastructure.

Policy LCR DP9 - Infrastructure Provision

- 3.48 Where new development creates a need for new or improved infrastructure, policy LCR DP9 proposes that development proposals should provide or support local infrastructure, services and facilities. Site-specific planning obligations should be used to secure delivery of infrastructure needs arising from development. The supporting text encourages the regular updating of district-level infrastructure delivery plans and testing their impact and effectiveness through Authority Monitoring Reports and Infrastructure Funding Statements.

Policy LCR DP10 - Sustainable Transport and Travel

- 3.49 Policy LCR DP10 states that development plans and proposals should plan positively to improve transport connectivity across the City Region in ways that enable sustainable growth, promote modal shift, reduce carbon emissions, improve air quality, and ensure safety. The supporting text notes that the success of the LCR and the Strategic sites identified in the SDS will depend partly on the quality of sustainable transport connections. Reference is made to the emerging LTP4 and the key aspiration of the CA for a City Region that connects all communities to opportunity through a reformed, fully integrated public transportation system that provides a true alternative to the car.

Policy LCR DP11 – Energy

- 3.50 Policy LCR DP11 states that development plans and proposals should contribute towards the reduction of carbon associated with energy generation and consumption, and minimising energy costs to communities and businesses. It specifically references a simplified version of the energy hierarchy set out in Wirral

Local Plan Policy WS8 and encourages district Local Plans to set where appropriate minimum renewable or low carbon energy requirements where viable and feasible.

Policy LCR DP12 - Resources

- 3.51 Policy LCR DP12 highlights the need to safeguard or protect waste facilities and sites as appropriate with regards to the sub-regional Joint Waste Local Plan. It also seeks to ensure that known mineral resources and associated supply infrastructure, including for secondary and recycled aggregate material, are identified and safeguarded as appropriate in Local Plans consistent with national planning policy and that minerals development does not have unacceptable adverse impacts and there is appropriate restoration and aftercare.

Policy LCR DP13 - Water Management and Flood Risk

- 3.52 Policy LCR DP13 sets out the key strategic measures for managing water sustainably in the City Region, addressing the risks water can pose and recognising its value as a vital natural resource, with a particular focus on flood risk, water quality and not compromising the operation of water supply and wastewater treatment infrastructure.

Policy LCR DP14 - The Historic Environment

- 3.53 Policy LCR DP14 aims to address the requirement of national policy in relation to the historic environment by setting out at a strategic level a positive strategy for the conservation and enjoyment of the historic environment. The City Region's designated and non-designated heritage assets are highlighted in the supporting text.

Policy LCR DP15 – Safer Placemaking

- 3.54 Policy LCR DP15 seeks to ensure that planning policies look at the need for safer placemaking for all parts of society and include all communities in the plan-making process, to help establish an understanding of the challenges and opportunities in each place. This policy requires all major developments that will result in crowded places, to produce a Safer Placemaking Design Statement, which could form part of a wider Design and Access Statement, that satisfies principles and standards that address the issues of crowded places and terrorism.

Policy LCR DP16 - Delivering Social Value

- 3.55 Policy LCR DP16 aims to ensure that development plans and proposals should make all possible efforts to maximise wider social value. The SDS bases Social Value on the "OECD Framework for Measuring Well-Being and Progress". The OECD Framework is built around three distinct components:

- current well-being;
- In agent equalities in well-being outcomes; and
- resources for future well-being.

The supporting text provides examples of how these components can be delivered through spatial planning.

Section 7: implementation

3.56 This section of the consultation document includes a list of proposed supplementary planning guidance notes the CA may prepare covering:

- Good Homes Standards
- Health Impact Assessment
- Carbon/Energy Statements
- Local Nature Recovery Strategy
- Natural Capital Approach
- Implementation of Social Value
- Agent of Change
- Safer Placemaking Design Statements
- Digital Infrastructure
- Design Guidance

Section 8: monitoring

3.57 This section includes a high-level framework for monitoring and reporting on the SDS and its delivery and performance framework – at this stage, this section sets out themes and potential indicators/data sources.

4.0 FINANCIAL IMPLICATIONS

4.1 There are no financial implications arising directly from this report.

5.0 LEGAL IMPLICATIONS

5.1 The preparation and adoption of the LCR SDS is a requirement of the LCR Devolution deal. The CA has its own legal requirements in relation to the scope and content of the SDS and the statutory stages of preparation which are separate to those applicable to local authorities, but the SDS still must have regard to national planning policy in the National Planning Policy Framework. Final approval of the SDS will require unanimous support of all the LCR local authorities. Once published the SDS will form part of the Development Plan for Wirral and future versions of the Wirral Local Plan will need to be in conformity with the SDS.

6.0 RESOURCE IMPLICATIONS: STAFFING, ICT AND ASSETS

6.1 Response to this engagement and prior work on the SDS has been undertaken by existing staff resources in the Forward Planning team within the Regeneration and Place Directorate.

7.0 RELEVANT RISKS

7.1 The process of responding to the LCR SDS engagement document does not in itself present any significant risks. The SDS will become part of the Development Plan for Wirral on adoption but is in broad alignment with the emerging Wirral Local Plan and

its focus on urban regeneration and should also support the Council's wider regeneration programmes and delivery. However not responding to this consultation would carry the risk that the Council's position is not fully reflected in the finalised SDS.

8.0 ENGAGEMENT/CONSULTATION

- 8.1 The CA has already undertaken some initial stages of public engagement, evidence preparation, objective setting and policy development. Initial engagement took place between November 2019 and January 2020 asking people what they want the plan to cover and priorities for the future.
- 8.2 Second stage engagement took place between November 2020 and February 2021, which sought further views on a proposed vision and set of objectives, along with approaches to several key policy areas. The five themed objectives were tackling climate change, a healthier city region, promoting an inclusive economy, place making and communities and social value.
- 8.3 The third and current stage of public engagement on the SDS is broadly akin to a Local Plan Regulation 18 / 'preferred options' consultation albeit non-regulatory. It is entirely separate from and should not be confused with, the ongoing Examination of the Wirral Local Plan. As with the previous stages of the SDS this has been conducted through use of an online/web-based platform and ran from 24 November 2023 to 16 February 2024. There were additionally in-person pop-up events in several towns across the city region run by PLACED on behalf of the CA. Wirral events were held at the Cherry Tree Centre in Liscard on Tuesday 30th January and Wednesday 31st January.

9.0 EQUALITY IMPLICATIONS

- 9.1 The Council has a legal requirement to ensure its policies, and the way it carries out its work, do not discriminate against anyone. An Equality Impact Assessment is a tool to help council services identify steps they can take to ensure equality for anyone who might be affected by a particular policy, decision or activity.
- 9.2 The SDS consultation document is accompanied by an interim Integrated Impact Assessment or IIA prepared by consultants AECOM on behalf of the Combined Authority. The IIA covers sustainability appraisal (SA), health impact assessment equalities impact assessment and an 'assessment of community safety' which would otherwise be produced as separate reports. The IIA documents can be viewed here: <https://www.liverpoolcityregion-ca.gov.uk/sdsengagement>

10.0 ENVIRONMENT AND CLIMATE IMPLICATIONS

- 10.1 The SDS consultation document includes a number of policies dealing with the protection and enhancement of the City Region's environmental assets and to address and mitigate climate change, in particular Policy LCR DP1 Planning for Climate Change, which is also intended to assist in the delivery of the CA's 5-year Climate Action Plan adopted in July 2023.

11.0 COMMUNITY WEALTH IMPLICATIONS

11.1 The SDS Consultation document includes a specific policy on delivering Social Value Policy LCR DP16. This policy is intended to help with the delivery of the Combined Authority's Social Value Policy and Framework Document 2022 which can be viewed here: <https://api.liverpoolcityregion-ca.gov.uk/wp-content/uploads/2023/09/LCRA-Social-Value-Policy-and-Framework-2022.pdf>

REPORT AUTHOR: **John Entwistle**
 Principal Forward Planning Officer
 telephone: 0151 691 8221
 email: andrewfraser@wirral.gov.uk

APPENDICES

Appendix 1- Council response to the Liverpool City Region Combined Authority

BACKGROUND PAPERS

Towards a Spatial Development Strategy for the Liverpool City Region up to 2040 - <https://www.liverpoolcityregion-ca.gov.uk/sdsengagement>

LCR SDS Housing and Economic Development Needs Assessment (HEDNA) (June 2023) <https://www.liverpoolcityregion-ca.gov.uk/sdsengagement>

Wirral Local Plan 2021-2037 Submission Draft - <https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/wirrals-new-local-plan/new-local-plan>

Wirral Strategic Housing Market Assessment (SHMA) update 2021 <https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-reports-3#anchor11>

Wirral Employment Land and Premises Study 2021: <https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-reports-3#anchor7>

The PDF files may not be suitable to view for people with disabilities, users of assistive technology or mobile phone devices. Please contact forwardplanning@wirral.gov.uk if you would like these documents in a more accessible format.

SUBJECT HISTORY (last 3 years)

Council Meeting	Date

Appendix 1- Council response to the Liverpool City Region Combined Authority

1. Draft Spatial Strategy

Policy LCR SS1 - Liverpool City Region Spatial Strategy

- 1.1 **Comment of the Chief Planner:** Policy LCRSS1 and the overall Spatial Strategy would support the strategy of urban regeneration and brownfield development which is the cornerstone of the emerging Wirral Local Plan and can therefore be supported by the Council. In relation to consultation question 5, the Council agrees that the policy provides an appropriate approach to delivering sustainable development, in the context of the geography of the City Region as a whole and in recognition of the strategic issues and opportunities present.

2. Spatial Priorities

Policy LCR SP1 - Strategic Housing Need and Distribution

- 2.1 **Comment of the Chief Planner:** The Council's position put forward at the Examination of the Wirral Local Plan is that the housing requirement should mirror the Local Housing Need calculated using the Government's national standard method with no uplift. The Submission Draft Local Plan Housing Requirement included a small uplift of 6 dwellings for economic growth, but the Council subsequently amended its approach in the hearing sessions and proposed that the 6 dwelling uplift be excluded from the housing requirement calculation.
- 2.2 The justification for adopting a requirement based on the standard method is set out in the Council's Housing Delivery Strategy as set out in Wirral Local Plan Examination Library document BP2; the Strategic Housing Market Assessment Update and Technical Appendices as set out in Examination Library documents H8 and H8.1; and in reports by the University of Liverpool, Exploring the Computation of Housing Need in Wirral as set out in Examination Library documents H6 and H6.1.
- 2.3 The latest evidence submitted to the Wirral Local Plan Examination as set out in a revised Housing Trajectory, Examination Library document WBC046, is that Wirral's housing requirement is likely to reduce slightly over the period to 2040, based on a rebased updated Standard Method calculation using 2022 affordability ratios and should be an average of 750 dwellings per annum during an updated Wirral Local Plan period extended to 2039/2040.
- 2.4 The recently issued Inspectors post-hearing note, Wirral Local Plan Examination Document INSP015, proposes that over an 18-year plan period the overall minimum housing requirement in the Wirral Local Plan should be 14,400 dwellings equivalent to an average delivery of 800 dwellings each year.
- 2.5 In relation to housing land supply the overall figure for Wirral included in the SDS does not provide for contributions from empty homes, which was included as an allowance in the submitted Draft Wirral Local Plan but will now be excluded in line with the Inspectors post-hearing note.

- 2.6 As the SDS nears adoption, developers may seek to claim that the housing requirement in the Wirral Local Plan, the supporting Wirral Strategic Housing Market Assessment and the currently identified housing land supply are 'out of date'. The Council is therefore likely to need to undertake updated housing need and land supply assessments.
- 2.7 In relation to the Strategic Housing sites the figures presented in the SDS relate to those included in the Proposed Submission Draft Wirral Local Plan 2021-2037 as submitted to the Secretary of State and the Council has no objection to their inclusion but will need to reserve its position to allow further comments to be submitted following finalisation of Main Modifications to the Local Plan.

Policy LCR SP2 - Strategic Employment Land Need and Distribution

- 2.8 **Comment of the Chief Planner:** There appears to be a typographical error in Table 5.8 and the second column heading should be "Floorspace Requirement for office Sq m".
- 2.9 The Council has participated in the working group of LCR officers set up to support the HEDNA 2023. An earlier draft was reviewed by the Council's consultants Avison Young who prepared the Wirral Employment Land and Premises Study or WELPS and their review was passed on to the Combined Authority. Some differences of approach appear to be down to different preferences between the consultants on methodology. The HEDNA 2023 is also based on a more up to date set of economic forecasts than the WELPS. Appraisal of the Wirral economy is inevitably less detailed in a sub-regional study. The SDS expresses the requirement for general employment land as a land requirement in hectares, while the requirement for office and research and development is expressed in square metres. This differs from the approach taken in the WELPS which expresses all finalised need in hectares.
- 2.10 The general employment land requirement identified in the SDS for uses within Use Class B2 in Wirral is 40.3 hectares. This is based on a past completions scenario. In the WELPS such a scenario was considered but dismissed, as it did not reflect how the Wirral economy was changing more widely or how some industrial premises were being used from a sectoral perspective. The adoption of the SDS scenario may well therefore mis-represent the pattern of future growth in the Wirral. The HEDNA 2023 notes however, that it may be appropriate for individual local planning authorities to test the conclusions on industrial demand further through individual local studies to take account of local market dynamics and the nature and growth potential of their individual local economies.
- 2.11 In relation to B1a office floorspace, the SDS/HEDNA requirement for Wirral is 17,300 square metres compared with the WELPS Economic Capacity requirement of 36,771 square metres, prior to conversion into a land requirement of 3.70 hectares. Former Use Class B1b for research and development was included as a requirement for other business space in the WELPS along with B2 floorspace. As such the figures in the SDS are not directly comparable with those in Wirral the Local Plan. As with housing, as the SDS nears adoption, the Council is likely to need to commission updated employment land need and land supply studies to ensure that it retains an up-to-date evidence base fully reflective of local circumstances.

Policy LCR SP3 - Brownfield Deliverability and Regeneration
Policy LCR SP4 - Strategic Infrastructure
Policy LCR SP5 - City and Town Centres
Policy LCR SP6 - Green and Blue Infrastructure
Policy LCR SP7 - International Connectivity
Policy LCR SP8 - River Mersey and the Coast
Policy LCR SP9 - Culture, Tourism and Visitor Attractions
Policy LCR SP10 - Rural City Region

- 2.12 **Comment of the Chief Planner:** in addition to the detailed comments on Policies SP1 and SP2, the Council is supportive in principle of draft Policies SP3 to SP10: they are generally consistent with the equivalent policies in the emerging Wirral Local Plan as submitted to the Secretary of State for Examination, but the Council will need to reserve its position to allow further comments to be submitted following finalisation of Main Modifications to the Local Plan.

3. Development Principles

Policy LCR DP1 - Planning for Climate Change
Policy LCR DP2 - Sustainable and Inclusive Communities

- 3.1 **Comment of the Chief Planner:** While the Council supports Policy LCR DP2 as worded, the housing mixes set out in Tables 6.2 and Table 6.3 do not reflect the Wirral SHMA which pre-dates the HEDNA 2023 and which can be viewed at <https://www.wirral.gov.uk/files/h8-wirral-shma-update-main-report-october-2021.pdf/download?inline?inline> and Figure ES2, page 10 of the SHMA refers:
- Differences between the Wirral SHMA and the SDS set out in Table 6.2 for the mix of homes needed for social/affordable rent are: Wirral SHMA 25% 1-bed - SDS 45%; Wirral SHMA 45% 2-bed - SDS 30%; Wirral SHMA 30% 3-bed - SDS 20%. Both documents have 5% for 4 bed homes.
 - Differences between the Wirral SHMA and SDS set out in Table 6.3 for the mix of affordable home ownership are: Wirral SHMA 10% 1-bed - SDS 20%; Wirral SHMA 40% 2-bed - SDS 45%; Wirral SHMA 25% 3-bed - SDS 30%; and Wirral SHMA 25% 4-bed - SDS 5%.
- 3.2 As with previous comments in relation to housing and employment land need and land supply as the SDS nears adoption the Council will need to undertake updated assessments to ensure Wirral retains an up-to-date evidence base fully reflective of local circumstances.

Policy LCR DP3 - Economic Prosperity
Policy LCR DP4 - Promoting Health and Wellbeing
Policy LCR DP5 - Impacts on Health
Policy LCR DP6 - High Quality Design
Policy LCR DP7 - The Natural Environment and Nature Recovery
Policy LCR DP8 - Making the Best Use of Land
Policy LCR DP9 - Infrastructure Provision
Policy LCR DP10 - Sustainable Transport and Travel
Policy LCR DP11 – Energy

Policy LCR DP12 – Resources
Policy LCR DP13 - Water Management and Flood Risk
Policy LCR DP14 - The Historic Environment
Policy LCR DP15 – Safer Placemaking
Policy LCR DP16 - Delivering Social Value

- 3.3 **Comment of the Chief Planner:** In considering how the SDS DP policies relate to the Wirral Local Plan, they arguably combine elements of both the “WS” Strategic policies and the more detailed “WD” Policies. They are generally worded with a standard preamble as “Development plans and proposals should...” In finalising the SDS the CA could usefully consider with the districts how the policies will interface with detailed Local Plan policies, particularly when considering planning applications. A further complication is the proposed introduction of national Development Management Policies following the enactment of the Levelling-up and Regeneration Act 2023.
- 3.4 As the combined effect of the SDS’s Spatial Priorities and Development Principles policies may supersede the Strategic policies in the Wirral Local Plan once adopted, a future review of the Local Plan may need to include fewer policies and focus on more Wirral-specific issues. That said, the content and principles in Policies DP1 to DP16, can be supported, but the Council will need to reserve its position to allow further comments to be submitted following finalisation of Main Modifications to the Local Plan.