

# **APPENDIX D**

Halton Borough Council

## **STATEMENT OF CONSULTATION**

Core Strategy Publication of the Submission Document

November 2010

Operational Director  
Environmental and Regulatory Services  
Halton Borough Council  
Rutland House  
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Runcorn  
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# Contents

**1. Introduction**

**2. Preparing a Development Plan Document**

**3. Core Strategy Commencement of Issues and Options**

**4. Core Strategy Issues and Options Partnership Consultation**

**5. Core Strategy Issues and Options Public Consultation**

**6. Core Strategy Issues and Options Representation Received**

**7. Core Strategy Commencement of Preferred Options**

**8. Core Strategy Preferred Options Public Consultation**

**9. Core Strategy Preferred Options Representation Received**

**10. Publication of Proposed submission of the Core Strategy DPD.**

**11. Submission of the Core Strategy**

**Appendices:**

**Appendix 1: List of Respondents**

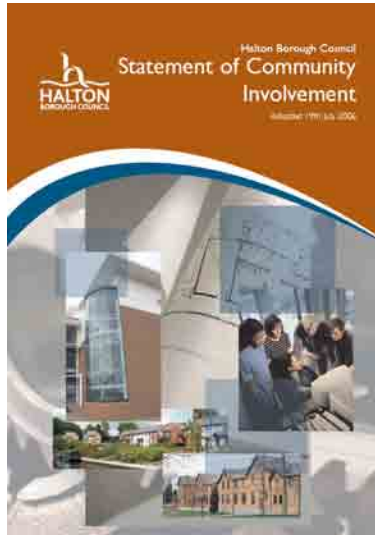
**Appendix 2: List of Representations Received and an explanation as to how this has been addressed in the Core Strategy Publication Document.**

## **1.0 Introduction**

- 1.1 Halton Borough Council has been working together with the community, stakeholders and other interested parties to produce the Halton Core Strategy Development Plan Document (DPD). Having reached the Publication stage of the Core Strategy, this Statement of Consultation outlines;
- How preparation and consultation for this document has been undertaken.
  - Which bodies and persons were invited to make representations in accordance with Regulation 25 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.
  - How those bodies and persons were invited to make such representations
  - A summary of the main issues raised by those representations, and
  - How those main issues have been addressed in the Core Strategy DPD.
- 1.2 The publication of the submission version of the Core Strategy DPD represents the requirement placed on the Local Authority to publish and make available the documents it proposes to submit in accordance with Regulation 27 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

## **2.0 Preparing a Development Plan Document**

- 2.1 The Core Strategy is a Development Plan Document (DPD) within the Halton Local Development Framework (LDF). The LDF is the folder of spatial plans which will replace the Halton Unitary Development Plan (UDP), as introduced by the 2004 Planning and Compulsory Purchase Act (as amended).
- 2.2 Once completed and adopted, the Core Strategy will form the overarching framework for the development of Halton to 2026 and beyond. As a DPD, it will contain development plan policies which will be used to guide development and investment in the Borough and also to determine planning applications. All subsequent DPDs and Supplementary Planning Documents (SPDs) will therefore be guided by the over-arching policies that the Core Strategy sets.
- 2.3 Core Strategies must be prepared in accordance with the relevant regulations (in this case the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008) and national planning policy. Guidelines for the preparation of Core Strategies are outlined in Planning Policy Statement 12: Local Spatial Planning (PPS12) and also in the accompanying “Plan Making Manual”, produced by the Planning Advisory Service.
- 2.4 Core Strategies must also be prepared in accordance with the local authority’s adopted Statement of Community Involvement (SCI), which sets out guidelines for public and stakeholder involvement in LDF preparation. Halton’s SCI was adopted by the Council on 19<sup>th</sup> July 2006.



Statement of Community Involvement

### 3.0 Core Strategy Commencement and Issues and Options

- 3.1 The Core Strategy Issues and Options Papers were produced by officers within the Forward Planning team of the Council. The process was officially commenced in early 2006, with a consultation with the statutory bodies on the scope of the Sustainability Appraisal from 24<sup>th</sup> March to 28<sup>th</sup> April 2009.
- 3.2 The main two documents produced were the Issues and Options Papers themselves, which contained information about the broad key issues and challenges affecting Halton, and options for tackling these issues. This included three broad alternative spatial options for the development of the Borough, as well as further spatial options for specific topics and areas.
- 3.3 The Options Paper was written specifically as a consultation document, with questions throughout about the options proposed, and scope for readers to comment on the content and respond to the questions posed. This part of the Options Paper has been referred to as the “long questionnaire”.
- 3.4 The production of the Issues and Options Papers involved much background work, research and consultation with existing policy at the national, regional and local level.
- 3.5 The Issues and Options Documents were also accompanied by supporting information, most notably that relating to the Sustainability Appraisal of the Core Strategy. For the Issues and Options stage, it was necessary to produce a Sustainability Appraisal Scoping Report and a Sustainability Appraisal Interim Report.



Issues Paper, Options Paper and Sustainability Appraisal Interim Report

- 3.6 As part of the consultation materials, a Core Strategy magazine was produced, which summarised the content of the Issues and Options paper in an easy-to-understand and accessible manner. The magazine also included a short questionnaire, to allow readers to comment on the broad content of the Issues and Options papers without having to engage in great detail with their content.



Core Strategy Magazine

## 4.0 Core Strategy Issues and Options Partnership Consultation

- 4.1 The Partnership consultation was conducted between 19<sup>th</sup> May and 9<sup>th</sup> June 2006, with both the Core Strategy Issues and Options Papers being sent to a wide variety of people across the Council, including the Chief Executive, the Strategic Director for Environment and many of the Operational Directors and also to several key stakeholders who are not within the Council including the Government Office for the North West and the Primary Care Trust. During the consultation period several meetings were also held to ensure that both Council

Officers and Council Members had the opportunity to contribute to the production of the Core Strategy Issues and Options papers.

- 4.2 There were three Council Officer meetings, held on 22<sup>nd</sup> May, 24<sup>th</sup> May and 30<sup>th</sup> May, again a wide variety of officers were invited to these meetings to ensure that as many people as possible were able to contribute to the production of the Core Strategy DPD. Details of who attended each of these meetings and a summary of the comments made can be found in the section 3 of the document. There was one meeting held with Council Members where the aim of the meeting was to discuss the Core Strategy Issues and Options Papers rather than endorse or agree the documents. This was the LDF Working Party, which met on the 1<sup>st</sup> June.
- 4.3 The Council Members have also endorsed the Core Strategy Issues and Options Papers through the Urban Renewal Policy and Performance Board, on 21<sup>st</sup> June 2006, and agreed the document for consultation through the Council's Executive Board. A report on the Halton Local Development Framework including information on the Core Strategy DPD was also presented to the Halton Strategic Partnership, at their meeting on 17<sup>th</sup> May 2006.

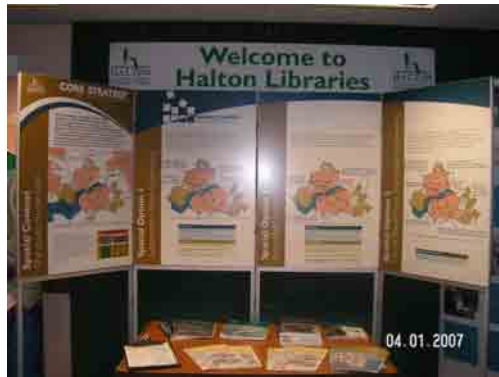
## 5.0 Core Strategy Issues and Options Public Consultation

- 5.1 The Core Strategy Issues and Options papers were published for a period of public consultation from 27<sup>th</sup> July to 7<sup>th</sup> September 2006.
- 5.2 Consultation materials, including copies of the Issues and Options Paper, Sustainability Appraisal document and Core Strategy magazine, were made widely available in various deposit locations and online on the Council's website. Links were also hosted on the website of the Halton Strategic Partnership and the Moore Community website. Notice of the publication of the documents was placed in local papers, including contact details and an explanation of how to respond to the content of the documents.



The Council's website

- 5.3 Promotional materials, including posters, press releases and display board were produced. These materials were used in a series of consultation “roadshows”, held from 8<sup>th</sup> to 17<sup>th</sup> August 2006, at various locations across the Borough. These roadshows, held during morning, afternoon and evening periods, represented an opportunity for members of the public to discuss the Issues and Options and wider Core Strategy and spatial planning issues with Council officers.



Issues and Options Roadshow

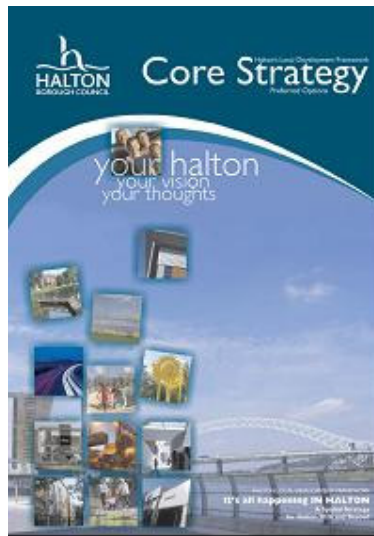
- 5.4 It was possible for consultees and respondents to submit their comments in writing or electronically. It was stated that views would be taken into consideration when developing the best options to take forward in the Core Strategy.

## 6.0 Core Strategy Issues and Options Representations Received

- 6.1 In total, 42 short questionnaires were received. These were completed by individuals, Councillors, Council departments, Parish Councils and other organisations. These representations included filled in questionnaire with additional comments where appropriate.
- 6.2 Further to this, 46 long questionnaires were returned. These included longer, more descriptive comments and responses to the questions posed.
- 6.3 These comments have been reviewed as part of the preparation of the Preferred Options stage of the Core Strategy and have been summarised within the "What you said at the Issues and Options Stage in 2006..." sections of the Preferred Options document.

## 7.0 Core Strategy Commencement of Preferred Options

- 7.1 The preparation of the Core Strategy Preferred Options document followed the completion of the Issues and Options public consultation.
- 7.2 The main document that has been produced is the Core Strategy Preferred Options document, which contains the Council's preferred overarching strategy for the development of the Borough to 2026.

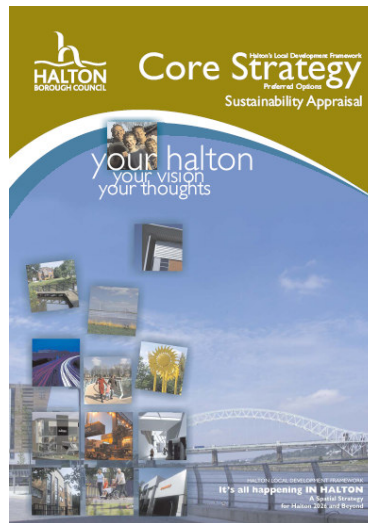


Preferred Options Document

- 7.4 The development of Core Strategy policy has been undertaken through consultation and discussion across the Council's services and with elected members.
- 7.5 Between 6<sup>th</sup> March 2007 and 29<sup>th</sup> July 2009, the Local Development Framework Working Party met a number of times to discuss the development of Core Strategy Preferred Options policy. Chaired by the Executive Board member for Planning, Transportation, Regeneration and Renewal, these meetings were well-attended by members, who participated in a meaningful discussion around a wide range of topics, and who oversaw the development of the Preferred Options document from research-based topic papers through to the development of preferred policy wording.
- 7.6 Between 2<sup>nd</sup> June 2008 and 22<sup>nd</sup> July 2009, the Core Strategy Officer Steering Group, chaired by the Chief Executive and attending by senior officers, met several times to discuss the development of Core Strategy Preferred Options policy. This started with a series of "Hot Topics" meetings to discuss the most pertinent issues for the development of Halton. Further meetings, alongside those of the Local Development Framework Working Party, allowed senior officers to oversee and contribute to the development of Core Strategy policy.
- 7.7 At various points of Core Strategy Preferred Options preparation, the Halton Strategic Partnership has been informed of progress and has received a series of presentations from the Divisional Manager for Planning and Policy. The partnership has been invited to comment on policy development at various stages.
- 7.8 In addition, the Council's Management Team have received a quarterly update of the progress towards the completion of the Core Strategy Preferred Options document, and also approved the public consultation draft prior to its consideration by the Council's Executive Board. This Executive Board, chaired by the Leader of the Council and attended by Portfolio holders was the body responsible for the approval of the Core Strategy Preferred Options for a period of public consultation. The document was approved on 9<sup>th</sup> September 2009.



- 7.9 During the drafting of the Core Strategy's preferred spatial strategy and the development of policy approaches, various officers of the Council have been involved in internal discussions regarding policy content. Some of these discussions have fed directly from the Core Strategy Officer Steering Group, while others have been on an ad-hoc basis during policy drafting. The discussions provided valuable insights into how Core Strategy policy could affect other Council service areas, and how policies could be drafted to better reflect the ongoing priorities and activities of these Council functions.
- 7.10 The Preferred Options document was supported by an in depth evidence base and a number of supporting documents including the Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), Health Impact Assessment (HIA) and an Equality Impact Assessment (EqIA).



Preferred Options Sustainability Appraisal

## 8.0 Core Strategy Preferred Options Public Consultation

- 8.1 The Preferred Options consultation represented Regulation 25 requirements for public participation, in accordance with the [Town and Country Planning \(Local Development\) \(England\) \(Amendment\) Regulations 2008](#).
- 8.2 The Core Strategy Preferred Options was subject to a 6 week period of public consultation from the 24<sup>th</sup> September to the 5<sup>th</sup> November.
- 8.3 The Preferred Options consultation allowed the public an opportunity to comment on the Preferred Policy Options and on the overall direction of the document.
- 8.4 It was crucial to ensure that people living and working in Halton had their say about the way in which Halton develops in the future. A range of consultation materials were prepared to raise awareness for Halton's communities.
- 8.5 This included an article in the "Inside Halton" magazine (September 2009 edition) which was sent to all residents and businesses in the Borough.



“Inside Halton” Magazine Article

8.6 It was also recognised that a large number of Halton Borough Council staff lived in the Borough and so an article was also placed in the “In Touch” magazine (September 2009 edition), circulated electronically to every member of staff in the Council. In addition, each member of the Council’s staff received notification of the consultation via leaflets attached to their September 2009 payslips.

8.7 Small scale exhibitions took place in key locations in the Borough during the consultation period, including Runcorn Street Market, the Greenoaks Centre and the Unicorn Gallery. Information was also posted in other public places, including the Council’s libraries, Town halls, Halton Direct Links and various shops and businesses in the Borough to raise awareness.



“In Touch” Magazine Article



Preferred Options Consultation Poster

- 8.8 A number of presentations took place with the Parish Councils and Area Forums and a presentation was given to members of Halton's Youth Cabinet.
- 8.9 Engaging young people has been highlighted as an important aspect of the Preferred Options document and in addition to speaking to the Youth Cabinet, a Facebook group was set up and invitations to present to every school in the Borough were circulated via the schools bulletin.
- 8.10 Businesses, organisations and individuals who also had an interest in how Halton develops and had requested to be notified of consultation periods for Development Plan Documents were contacted via letter. Statutory consultees, who the Council must consult on the content of the Core Strategy, were also informed.
- 8.11 Representations were invited in a number of ways including:
- **In Person:** by speaking to a member of the team at the exhibitions or presentations.
  - **Online at:** [www.halton.gov.uk/spatialplanning](http://www.halton.gov.uk/spatialplanning) where an online form can be completed
  - **By emailing:** [forward.planning@halton.gov.uk](mailto:forward.planning@halton.gov.uk)
  - **In writing**
  - **By phoning:** 0303 333 4300
  - **By texting:** your name and the words Halton 2026 to 07786 203300 and one of our staff will call back

## 9.0 Core Strategy Preferred Options representations received

- 9.1 The public consultation on the Preferred Options documentation resulted in 51 submissions being received from interested parties and members of the public. Despite the seemingly low number, the nature of the comments made within these 51 representations was wide ranging and covered a multitude of issues. Some individual responses were very extensive and totalled over 30 pages, and ultimately the value lies in the content of the comments, rather than the overall number received.
- 9.2 A full list of the 51 organisations and individuals who commented on the Core Strategy Preferred Options documentation is contained within Appendix 1 of this report. Appendix 2 lists the comments received, describes how they have been addressed and what changes have been made to the Core Strategy Publication document as a result.
- 9.3 A summary of the issues raised have been divided between four types of respondent. These are:
- Agencies with no particular development interest (NDI) = 18
  - Developers/land owners with a specific interest (Dev) = 14
  - Democratic institutions (Dem) = 10
  - Members of the public (Pub) = 9

9.4 The following sections briefly summarise the nature of the comments received by each type of organisation.

#### **9.5 Agencies with No Particular Development Interest (NDI)**

The majority of comments received on the Preferred Options documents came from respondents who have been grouped together under the title 'Agencies with no particular development interest'. These organisations are not developers, but have an interest in how Halton develops because of their remit, whether that relates to protecting the region's environment or promoting economic development. Many of the organisations in this group are linked to Central Government, and as such, have a duty to consider Local Authorities' LDFs, just as equally, we as a Local Authority have a statutory duty to consult such agencies. Examples of the type of organisations within this sub-group are Executive Agencies of the Government, such as the Highways Agency, the National Offender Management Service and the Environment Agency. Regional organisations, such as Northwest Regional Leaders 4NW and the Northwest Regional Development Agency (NWDA) also fell within this sub-group of respondents.

Reflecting the variety of interests represented by this sub-group, the comments made were wide-ranging. A number of comments related to the overall spatial strategy for future development in Halton, with respondents emphasising the need to prioritise regeneration of brownfield sites over a release of greenfield sites. The proposed Key Area of Change at East Runcorn generated the most comments, with respondents raising concern over the deliverability and sustainability of any development at this location. Comments were also made regarding the need to protect the borough's important green spaces and utilise the renewable energy resources available in Halton by promoting renewable energy installations.

#### **9.6 Developers/land owners with a specific interest (Dev)**

Responses within this sub-group were received from or on behalf of individuals, companies and agencies with specific land holdings, businesses or development interests in the Borough that will be affected by the content of the LDF. Respondents included two national house builders, a number of land owners (promoting the development of their sites) and some existing employers seeking to ensure proposals do not prejudice their ongoing operations. In general comments related both to the treatment of specific sites in the Core Strategy and to the wider strategy where amendments are suggested to protect or facilitate particular development proposals.

Individual sites for which representations were lodged include land at north Widnes, Runcorn Docks, land to east of Manor Park (Runcorn), Daresbury SIC, the Highways Agency Depot (Preston Brook) and some existing commercial sites on Widnes Waterfront. In addition representations were made concerning the content of the Core Strategy in relation to facilitating the expansion of Liverpool John Lennon Airport including possible amendments to the Green Belt.

The Council's assumptions concerning land supply, the deliverability of housing sites and the proposed development strategy including the balance of proposals between Runcorn and Widnes was challenged and a review of the Green Belt requested. Employment land supply was raised and the need to retain existing employment sites highlighted.

Developers also questioned the basis for the affordable housing policy and objected to the introduction of a 'contributions' or 'tariff' regime. The detailed coverage and extent of green infrastructure, especially application of 'Green Lung' status to Widnes Golf Course was disputed.

### **9.7 Democratic Institutions (Dem)**

The democratic institutions sub-group consists of Halton's political parties, parish councils, adjoining local authorities, associated public companies, public housing organisations and Halton Borough Council officers. The respondents included within this sub-group therefore have an important position and part to play in respect of how Halton develops in the future. Of the ten submissions received from this sub-group it is worth noting that one of these included the Parish Council Planning Liaison Group which consists of Preston Brook, Daresbury, Sandymoor and Moore Parish Councils.

A number of the comments received from the democratic institutions related to the overall Spatial Strategy and the proposed urban extension at East Runcorn. The main emphasis of these comments question the preferred Spatial Option of a brownfield focus combined with an urban extension, the level of proposed development at East Runcorn and the previously developed land target. Other comments received relate to the Neighbourhood Priority Areas, the proposed development at Runcorn Docks, the role of the Strategic Housing Market Assessment and Halton's retail centres.

### **9.8 Members of the public (Pub)**

Responses received from members of the public generally relate to specific sites or areas of the Borough and not to how the Core Strategy complies with national and regional policy. Of specific relevance are comments relating to issues around the amount of development proposed, affordable housing, the spatial strategy in terms of a brownfield focus, the designation of Runcorn Old Town centre as a district centre, childhood obesity and what the Core Strategy can do to help, and the protection of the Green Belt. Other comments relate to supporting documents such as the Health Impact Assessment and the Equality Impact Assessment.

## **10 Publication of Proposed submission of the Core Strategy DPD.**

10.1 In accordance with Regulation 28, the Local Authority must allow at least six weeks in which to receive representations on the Core Strategy DPD. The requirement for Councils to seek representations on the published plan is not an additional stage of public participation or consultation. The purpose of the regulation is to gather representations on the soundness of the development plan document that is to be submitted to the Secretary of State to examine as part of the submission material. At this stage, the Council have published a plan which it believes to be 'sound', which means that it feels that the content of the plan is:

- **Justified** – in relation to the evidence base and is also the most appropriate strategy for the area;
- **Effective** – meaning that the plan can be delivered, but is also flexible enough to deal with changing circumstances; and

- **Consistent** – with National Policy.

## 11. Submission of the Core Strategy

11.1 Following on from the eight week representation period at the proposed submission of the Core Strategy stage, the Core Strategy is then submitted to the Secretary of State in accordance with Regulation 30 of the aforementioned Act, who will appoint an independent Planning Inspector to examine the soundness of the plan. Any representations received at the submission stage will be sent to the Planning Inspector to be considered alongside the soundness of the plan at the Examination.

11.2 The current timetable for the remaining key stages in the production of the Core Strategy is shown in Table 1 below.

Commencement	<b>March 2006</b>
Issues and Options Consultation	<b>June - Sept 2006</b>
Preferred Options Consultation	<b>Sept - Nov 2009</b>
Publication	<i>November 2010</i>
Submission to Secretary of State	<i>February 2011</i>
Pre-Hearing Meeting	<i>April 2011</i>
Hearing Session Open	<i>June 2011</i>
Inspectors Binding Report	<i>September 2011</i>
Adoption	<i>December 2011</i>
Commencement	<b>March 2006</b>

11.3 Representations are therefore invited in a number of ways including:

- **In Person:** by speaking to a member of the LDF team available at Halton Direct Link, Rutland House, Halton Lea, Runcorn
- **Online at:** [www.halton.gov.uk/spatialplanning](http://www.halton.gov.uk/spatialplanning) where an online form can be completed
- **By emailing:** [forward.planning@halton.gov.uk](mailto:forward.planning@halton.gov.uk)
- **In writing to:**  
Halton Core Strategy,  
Environment and Regulatory Services,  
Halton Borough Council,  
Rutland House,  
Halton Lea,  
Runcorn,  
WA7 2GW
- **By phoning:** 0303 333 4300

## APPENDIX I

### Core Strategy Preferred Options Consultation List of Respondents

		Agent (where applicable)
<b>Agencies with No Particular Development Interest (NDI)</b>		
1	The Theatres Trust	
2	The National Trust	
3	Envirolink Northwest	
4	National Offender Management Service	Atkins Global
5	Environment Agency	
6	Government Office North West	
7	4NW	
8	Cheshire Wildlife Trust	
9	NWDA	
10	Highways Agency – Strategic Planning	
11	Merseytravel	
12	The Coal Authority	
13	Mersey Forest	
14	Network Rail	
15	English Heritage	
16	United Utilities	
17	Natural England	
<b>Developers/land owners with a specific interest (Dev)</b>		
18	Redrow	
19	Great Lime Holdings	
20	Specimen Trees, Knutsford	McDyre and Co
21	W.Smith & Sons, Cranshaw Hall Farm	McDyre and Co
22	Homes & Communities Agency	GVA Grimley
23	Peel Energy	Drivers Jonas
24	Highways Agency	King Sturge
25	Dreaming Spires Ltd	Jones Lang Lasalle
26	Bellway Homes	
27	Peel Holdings	
28	Mobile Operators Association (MOA)	Mono Consultants
29	Tangent Properties	
30	Daresbury Science and Innovation Campus	King Sturge
31	Saffil Ltd	BNP Paribas
32	ADS Recycling	Emery Planning Partnership
<b>Democratic Institutions (Dem)</b>		
33	Halton Lib Dem	
34	Promotion and Tourism	
35	Older People; Health & Community HBC	
36	Halton Housing Trust	
37	Knowsley BC	
38	NFU	
39	St Helens Council	
40	Moore Parish Council	
41	Parish Council Planning Liaison Group	
42	Halton Conservative Club	
<b>Members of the Public (Pub)</b>		
43	Roger G Pearce	
44	Carl Crowley	
45	Thomas Warburton	
46	Sheila Keough	
47	Richard Williams / H Cadwallader	
48	Seth Kay	
49	Prof David Norman	
50	Janet Wood	
51	Phil Harper	

## APPENDIX 2

### Analysis of Key Issues arising from the Core Strategy Preferred Options consultation and an explanation as to how this has been addressed in the Core Strategy Publication Document.

Preferred Options Policy Ref: Title	Key Issue to be resolved	How this issue has been addressed at Publication
<b>CSI Halton's Spatial Strategy</b>	<p>The Core Strategy should plan for the future development of the Borough to 2031 instead of 2026.</p>	<p><b>Suggestion not incorporated.</b></p> <p>Planning Policy Statement 12 sets out the requirement for Core Strategies to plan for a minimum period of 15 years. From the proposed adoption date of December 2011, Halton's Core Strategy should therefore cover the period to 2026.</p> <p>There is felt to be an insufficient policy framework and evidence base to extend Halton's Core Strategy beyond this period.</p>
	<p>Halton should promote a strategy of brownfield regeneration, which excludes the designation of a Sustainable Urban Extension.</p>	<p><b>Suggestion not incorporated.</b></p> <p>The proposed Spatial Strategy maintains the focus for new development on brownfield land in the Borough. Analysis through the Strategic Housing Land Availability Assessment (<b>SHLAA</b><sup>1</sup>) and work undertaken on employment land supply (<b>JELPS</b><sup>2</sup>) indicates that there is insufficient land available within the existing built up areas to meet future development needs.</p> <p>In addition to the shortage of brownfield land within Runcorn and Widnes, much of the land covered by the Sustainable Urban Extension at East Runcorn benefits from land allocations in the Unitary Development Plan or existing planning consents.</p>
	<p>A phased approach to the release of land should be included to ensure that brownfield land is developed ahead of greenfield land.</p>	<p><b>Suggestion partially incorporated.</b></p> <p>Further commentary is included within the Core Strategy which explains the implied phasing as set out in policy CS3: Housing and Locational Priorities. Policy CS3 also sets out a sequential process to meeting the housing requirement which prioritises brownfield sites over greenfield sites.</p> <p>Policy CS4 Employment Land Supply and Locational Priorities has also been amended to follow a similar format to CS3, and thus prioritising existing brownfield sites over the release of greenfield sites for the employment uses.</p>

<sup>1</sup> SHLAA: Strategic Housing Land Availability Assessment 2010

<sup>2</sup> JELPS: Joint Employment Land and Premises Study



Preferred Options Policy Ref: Title	Key Issue to be resolved	How this issue has been addressed at Publication
	A number of alternative areas of land (namely greenfield sites and land within the Green Belt) are proposed instead of those areas included within the current Spatial Strategy.	<p><b>Suggestion not incorporated at this time</b></p> <p>Policy CS21 Green Belt addresses the issue of green belt protection with the exception of Liverpool John Lennon Airport expansion proposals in accordance with Policy CS16. Given the current analysis of land supply in Halton, a Green Belt review is not currently necessary. Suggestions for development on Greenfield sites will be addressed in a Site Allocations DPD and will be re-examined during the next stage of producing the LDF.</p>
	Due to the highly constrained nature of brownfield land in the Borough, it is not felt that the housing and employment land requirements can be met if the proposed Spatial Strategy is pursued. A review of Green Belt boundaries is required.	<p><b>Suggestion partially incorporated.</b></p> <p>Analysis of the housing and employment land supply for the Core Strategy period indicates that there is sufficient land in the Borough to deliver the required levels of development, if the proposed Spatial Strategy is pursued.</p> <p>It is recognised that looking beyond the Core Strategy time period of 2026, there may be the need to review Green Belt boundaries and Halton are partaking in a sub-regional Overview study with partners in the Liverpool City Region to review the sub-regional supply of land for housing and employment purposes in the future.</p>
	Request for the overall spatial strategy to refer to detailed change to the Green Belt required to facilitate the expansion of Liverpool John Lennon Airport (LJLA).	<p><b>Suggestion incorporated.</b></p> <p>The incorporation of an area of search to accommodate the expansion of LJLA within the Spatial Strategy has been addressed in Policy CS 21 indicating that a minor alteration of the green belt boundary will be supported in accordance with Policy CS 16 the extent of the green belt boundary change will be addressed in a subsequent DPD.</p>
	Suggestion that Runcorn Docks should be designated as a Strategic Site.	<p><b>Suggestion not incorporated.</b></p> <p>Insufficient evidence in relation to the sites deliverability was unavailable preventing this site being designated as a Strategic Site.</p>

Preferred Options Policy Ref: Title	Key Issue to be resolved	How this issue has been addressed at Publication
<b>CS3 Housing Supply and Locational Priorities</b>	<p>A number of issues were raised in terms of the overall Previously Developed Land (PDL) target:</p> <ul style="list-style-type: none"> <li>• Requirement for an overall target for housing delivery on brownfield land to be included in the plan</li> <li>• Regional Spatial Strategy target for Halton for brownfield land is achievable</li> <li>• RSS sets out a combined brownfield land target for Halton and St Helens. The current reliance on St Helens to meet the combined target means that priority should be given to releasing brownfield sites in St Helens ahead of greenfield sites in Halton.</li> </ul>	<p><b>Suggestions partially incorporated.</b></p> <p>The issue of a target for Previously Developed Land (PDL) has been addressed in Policy CS3 Housing supply and locational priorities incorporating a target of 50% of new residential development delivered on brownfield land over the plan period.</p> <p>The revocation of the Regional Spatial Strategy has addressed the remaining issues.</p>
	<p>The Council should make provision for 600 net additional dwellings per annum for the period 2008-2026 to reflect Growth Point status. At least 1000 additional dwellings should be provided to 2026.</p>	<p><b>Suggestion not incorporated.</b></p> <p>Growth Point Status will discontinue post April 2011. Housing provision in the Borough has been based upon evidence from a variety of sources, including predicted population, household and economic growth. The process for reaching a housing target of 8000 net additional new homes at an average rate of 500 homes per year is set out in the supporting document "Determining a Housing Requirement for Halton" (HBC, 2010).</p>
<b>CS4 Employment Land Supply and Locational Priorities</b>	<p>The employment land requirement is considered to be difficult to meet and therefore all existing employment areas should be retained.</p>	<p><b>Suggestion substantially incorporated.</b></p> <p>The protection and safeguarding of existing employment areas has been embedded in Policy CS 4 Employment Land supply and locational priorities.</p>
	<p>The Core Strategy needs to set out where in the Borough the employment land requirements will be met.</p>	<p><b>Suggestion substantially incorporated.</b></p> <p>Policy CS 4 Employment Land supply and locational priorities sets out broad locations in the Borough where employment land requirements will be met. More detailed locations will be allocated in a subsequent DPD.</p>

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	The figure for the employment land requirement for the Core Strategy period may need to be increased to reflect Growth Point status and the consequent increase in population.	<p><b>Suggestion not incorporated.</b></p> <p>The figure for Halton's employment land requirement is taken from the Joint Employment Land and Premises Study which has taken the Mid-Mersey Growth Point into account. Employment land needs forecasting figures are based around previous land take-up rates and population levels are not a major factor in influencing these figures.</p>
CS5 Neighbourhood Priority Areas	The policy as drafted appears to contradict the Spatial Strategy and the approach to prioritise development in the Key Areas of Change.	<p><b>Policy not carried forward</b></p> <p>To ensure any inconsistencies between the approach for the NPAs and the overall Spatial Strategy are resolved this policy has been deleted Elements of the policy have been incorporated into various policies within the document.</p>
	Concern over the presumption for Neighbourhood Priority Areas (NPAs) to be the sequentially preferable location for employment development.	<p><b>Policy not carried forward</b></p> <p>This policy has been deleted.</p>
CS8 South Widnes	A wider town centre boundary should be drawn for Widnes as the current approach would constrain development.	<p><b>Suggestion incorporated.</b></p> <p>In light of the evidence provided by Halton Retail Study and in response to comments received, the extent of Widnes Town Centre is now defined and illustrated in Policy CS 5.</p>

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<p><b>CS9 East Runcorn</b></p>	<p>General objections to the promotion of a sustainable urban extension at this location for the following reasons:</p> <ul style="list-style-type: none"> <li>• Lack of justification that development in this area is needed</li> <li>• Gives preference to the development of greenfield sites over other areas of the Borough</li> <li>• Lack of justification for the area to become a location for Regionally Significant Economic Development, as set out in RSS</li> <li>• Strategic Sites should be focused on existing settlements</li> <li>• Land should be used in a more sustainable way</li> </ul>	<p><b>Suggestion not incorporated.</b></p> <p>As stated above in response to the issues raised under policy CSI, the planned development at East Runcorn is required to meet the Borough's housing and employment land requirements. Insufficient land exists within the existing urban area to meet Halton's needs for future development without extending the Borough to the east of Runcorn.</p> <p>The existing employment areas at Daresbury (Business Park and Science and Innovation Campus) have been identified as a Strategic Regional Site by the Northwest Regional Development Agency (NWDA). No guidance exists as to where Strategic Sites should be located, but the Daresbury area is felt to constitute a Strategic Site. The expansion of the employment offer at the Business Park and at the Science and Innovation Campus will support the diversification of the Borough's economy, which is a key objective of the Core Strategy.</p> <p>The intention of the proposal for further development at East Runcorn is to expand the existing employment offer to create a more cohesive employment area which better relates to adjoining areas, rather than a series of separate development sites.</p> <p>The policy reference in the proposed submission document is now CS10.</p>
	<p>Comments questioned the sustainability of East Runcorn for new housing and employment development, with reference made to poor sustainable transport links and connectivity with the rest of the Borough, the lack of community services and facilities in the area and fears that additional development will exacerbate flooding in the area.</p>	<p><b>Additional evidential work undertaken.</b></p> <p>As discussed in the response directly above, expansion of the existing development at East Runcorn is necessary to bring the separate areas of development together to form a cohesive extension to the Borough, where the day-to-day needs of those who live and work in the area can be met, through provision of community services and local shopping opportunities, connected by sustainable transport infrastructure.</p> <p>In relation to new development exacerbating flood risk, Halton's Level 1 Strategic Flood Risk Assessment indicates that additional development will not increase flood risk across the area. The existing balancing lake to the west of the area at Wharford Farm is identified as having a greater risk of flooding than the rest of the site. This is acknowledged in the proposed policy by the retention of the balancing lakes in line with the principles of 'making space for water'.</p>

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	Further detail required on infrastructure requirements for the area.	<p><b>Additional evidential work undertaken</b></p> <p>The need for additional information on infrastructure requirements at East Runcorn is acknowledged. The Council's has produced a background/topic paper focusing on the area which will provide further detail in support of the policy. The Council will continue to work with the development partners for the area to establish essential infrastructure requirements and mechanisms for delivery.</p>
	Proposed station will be difficult to implement due to viability issues given proximity to Runcorn East station and the feasibility of a new station on the West Coast Main Line.	<p><b>GRIP study undertaken by Network Rail</b></p> <p>A new station at East Runcorn to serve the sustainable urban extension remains a long term aspiration, although it is acknowledged that this may be unachievable in the lifetime of the Core Strategy it is felt that safeguarding the land for a transport interchange in this location is justified.</p>
	The impact of the proposed development on the highways network will need to be assessed through a transport assessment.	<p><b>Additional evidential work undertaken</b></p> <p>The Council has commissioned a transport assessment at East Runcorn to assess the impact of planned development on the highways network and to ensure sufficient capacity exists.</p>
<b>CS10 West Runcorn</b>	Further details required on what is proposed at Runcorn Docks and how it will be achieved.	<p><b>Suggestion noted. Additional work to be undertaken in partnership with landowner</b></p> <p>The Runcorn Docks redevelopment has the potential to make a significant contribution to the delivery of the Core Strategy objectives. The site is being promoted by Peel Holdings and its delivery will be dependent upon the company's intentions.</p> <p>The policy reference in the proposed submission document is now CS9.</p>
	Proposals to de-link the Silver Jubilee Bridge which incorporate the impact of 4000 additional dwellings at Runcorn Docks should be tested using traffic modelling.	<p><b>Suggestion noted. Additional work to be undertaken, including with landowner.</b></p> <p>Given the proposed scale of the development at Runcorn Docks, transport and highways considerations will form an important part of the schemes appraisal. These have not yet been addressed as the proposed development mix has not been confirmed.</p> <p>Detailed appraisal of options for the delinking of the Silver Jubilee Bridge in Runcorn have had regard to outstanding development commitments and are being dealt with as part of the wider Mersey Gateway Priority Project.</p>
	Objection to Runcorn Old Town being classified as a district centre, for retail planning purposes.	<p><b>Suggestion not incorporated</b></p> <p>See detailed response under Policy CS17.</p>

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	Runcorn Old Town suffers from accessibility problems.	<p><b>Comment noted.</b></p> <p>The dislocation of Runcorn Old Town centre from its residential hinterland is a longstanding issue. This is identified in the Mersey Gateway Regeneration Strategy and is a consideration in the proposed delinking of the Silver Jubilee Bridge. The Core Strategy seeks to facilitate mitigation measures where possible with the aim of improving connectivity and access.</p>
<b>CS12 Affordable Housing</b>	Concern that the policy is too restrictive and that the proposed threshold and percentage of affordable housing to be sought need to be justified in terms of development viability.	<p><b>Additional evidential work undertaken.</b></p> <p>Following Preferred Options a Strategic Housing Market Assessment (SHMA) was undertaken in 2010 which enabled a Borough-wide target to be justified in terms of development viability, as illustrated in Policy <b>CS12: Affordable Housing</b></p>
	The level and nature of affordable housing being sought should relate to a Strategic Housing Market Assessment.	<p><b>Suggestion noted. Strategic Housing Market Assessment has been undertaken.</b></p> <p>The Preferred Options policy clearly stated that the policy will need to be supported by an up to date Strategic Housing Market Assessment (SHMA) before adoption. This was completed in 2010 and forms the evidence upon which the level and nature of affordable housing in Policy <b>CS12: Affordable Housing</b> is being sought</p>
<b>CS14 Design of New Residential Development</b>	This policy should include a requirement for residential development to achieve Lifetime Homes standards.	<p><b>Suggestion not incorporated</b></p> <p>The use of Lifetime Homes Standard was considered for Preferred Options but discounted due to issues of implementation and monitoring. Subsequently Policy CS 11 seeks to encourage the delivery of homes which meet the Lifetime Homes Standard. A general review of Policy CS14 Design for new residential development has resulted in the amalgamation of this policy with other design policies within the Core Strategy at Preferred Options stage resulting in Policy CS17 High Quality Design.</p> <p>The policy reference in the proposed submission document is now CS17</p>
<b>CS17 A Network of Centres</b>	Concern over the detrimental impact of designating Runcorn Old Town as a district centre	<p><b>Suggestion noted but not incorporated</b></p> <p>This is largely a technical matter. This approach has been substantiated by the Halton Retail Study and Policy CS5 A Network of Centres for Halton. The hierarchy of centres will ensure protection from inappropriate development.</p> <p>The policy reference in the proposed submission document is now CS 5</p>

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<b>CS24 Sustainable, Low Carbon and Adaptable Development</b>	The Code for Sustainable Homes and BREEAM standards for commercial development duplicate the requirements of Building Regulations.	<p><b>Suggestion noted but not incorporated</b></p> <p>It is important that the Core Strategy sets out the need for all development in the Borough to achieve high standards of sustainability and highlight the Council's commitment to contribute to carbon emission reductions and respond to existing and anticipated climate change risks. The Liverpool City Region Renewable Energy Capacity Study ensures that the requirements as set out in this policy are achievable and compliment the requirements of Building Regulations as opposed to duplicating them.</p> <p>See Policy CS18 in the proposed submission document.</p>
<b>CS26 Green Infrastructure</b>	<p>The proposed 'green lung' at Widnes Golf Course should be deleted as the green spaces within this area have little or no functional relationship and poor public access.</p> <p>The results of the ongoing Greenfield: Brownfield Exchange Concept study and the Brownfield Strategy should be incorporated into this policy.</p>	<p><b>Suggestion incorporated</b></p> <p>The proposed 'green lung' at Widnes Golf Course has been deleted.</p> <p><b>Suggestion not incorporated</b></p> <p>The Greenfield: Brownfield Exchange Concept study concluded that further evidence would be required to pursue an alternative policy approach. Therefore due to insufficient evidence no change to the policy is proposed.</p>
<b>CS28 Encouraging Sustainable Transport</b>	Clearer links need to be made between the sustainable transport proposals in this policy and planned development as set out in the Spatial Strategy.	<p><b>Suggestion partially incorporated</b></p> <p>Full consideration should be given to future transport demands, the impact on Halton's Strategic Road Network and how more sustainable modes of transport can be encouraged. This will be especially important for the Key Areas of Change and in particular East Runcorn. Amendments to policy <b>CS 14 Sustainable Transport</b> also incorporates a reference to transport modelling undertaken.</p>
<b>CS29 Tackling Congestion, Pollution and Emissions</b>	A better understanding of existing and potential future congestion hotspots needs to inform the Core Strategy to ensure that the highways network can continue to operate safely and efficiently.	<p><b>Suggestion noted and additional evidential work undertaken</b></p> <p>It is the Council's intention to expand understanding of existing and potential future congestion hotspots through transport modelling. This policy has been deleted. Elements of this policy have been incorporated into policy CS23 Managing Pollution and Risk.</p>

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<b>CS32 Liverpool John Lennon Airport</b>	A policy within the Core Strategy or wider LDF is needed which will clearly set out how the expansion of Liverpool John Lennon Airport can be achieved through a change to the Green Belt boundary.	<p><b>Suggestion incorporated</b></p> <p>The precise extent of the change (<i>to the Green Belt boundary</i>), and detailed criterion to be met in its implementation, will be set out in a Site Allocations and Development Management DPD.</p> <p>Detailed commentary on this issue is provided under policy CS1.</p> <p>The policy reference in the proposed submission document is now CS16</p>
<b>CS33 Infrastructure Provision</b>	<p>The introduction of a blanket tariff approach to infrastructure provision is contrary to Circular 05/2005.</p> <p>The detail surrounding how such an approach would be implemented should not be delegated to a Supplementary Planning Document.</p>	<p><b>Suggestion not incorporated</b></p> <p>The approach to securing developer contributions towards the cost of infrastructure will be provided in a subsequent Developer Contributions DPD.</p> <p>Circular 05/2005 sets out requirements for planning obligations using S.106 agreements including the requirement that obligations must relate directly to the development proposed.</p> <p>The introduction of a tariff based approach is not necessarily contrary to Circular 05/2005. The Government is introducing the requirement for LPAs to prepare Infrastructure Plans and has introduced the Community Infrastructure Levy (CIL) as a means to securing contributions.</p> <p>The policy reference in the proposed submission document is now CS6</p> <p><b>Suggestion accepted.</b></p> <p>The detail surrounding this approach and detailed criterion to be met in its implementation will be set out in a separate Developer Contributions DPD.</p>
<b>General</b> -	The Core Strategy should include a policy which supports renewable energy projects.	<p><b>Suggestion incorporated</b></p> <p>Renewable energy projects are encouraged in Policy CS 18; Sustainable Development and Climate change</p>