

**Appendix B – Summary of Main Issues Raised and Changes Required
Halton Core Strategy Proposed Submission Document, November 2010**

General¹

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
17	0	2	2	0	0

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	A number of important evidence base documents were not published at the time the Council approved the Publication Core Strategy and some were not available over the consultation period. In the absence of these documents the Core Strategy is considered to have failed the test of soundness for being “justified”.	A number of evidence base documents referred to were available to the Council in draft form prior to consultation on the Proposed Submission Document and hence have been used to influence the policies. These documents were due to be finalised and available during the consultation period, however, due to unforeseen circumstances this failed to be the case. It has now been agreed to re-publish the Core Strategy Proposed Submission document, which will allow comments to be made in relation to these	The Core Strategy Proposed Submission document is to be re-published for a 6 week consultation period.

¹ It should be acknowledged that a number of general issues raised through the representations received are dealt with in specific policies.

No.	Comment Received	HBC Comment	Change Required
		evidence base documents.	
2	Unable to consider the Council's most up to date Strategic Housing Market Assessment (SHMA). Wish to reserve position in respect of Hale Village and the provision of a sufficient and balanced housing offer. The settlement of Hale is seen to play a significant role within the Borough and should not be prohibited from limited sensitive development and change that respects the rural character of the village.	<p>The SHMA was available to the Council in draft form prior to consultation on the Proposed Submission Document and hence has been used to influence the policies. The document was due to be finalised and available during the consultation period, however, due to unforeseen circumstances this failed to be the case.</p> <p>In accordance with the comment made regarding Hale Village and future sensitive development, Policy CS6: Green Belt states that infill development within Hale Village will be viewed as appropriate where it would enhance the character of the village.</p>	The Core Strategy Proposed Submission document is to be re-published for a 6 week consultation period to allow comments to be made in relation to the SHMA.

Introduction

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
2	0	0	0	0	0

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Status of the draft Liverpool City Region Spatial Priorities Plan is questioned.	Following the publication of the Core Strategy Proposed Submission Document the status of the LCR Spatial Priorities Plan has become uncertain and may not now be finalised.	Remove reference to the Liverpool City Region Spatial Priorities Plan.

Section 2 – Story of Place

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
3	0	2	0	1	0

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Recommend that 'Halton's Challenges' refer to the importance of maintaining and enhancing the Borough's green infrastructure network.	It is agreed that this section should refer to the importance of the Borough's green infrastructure network.	Additional bullet required concerning the need to protect, enhance and (where appropriate) expand the Borough's green infrastructure network.
2	Detailed environmental information data should be included to support the text in this section.	Agreed that this would be a beneficial addition, however, the number of designations and sites across the Borough would be too long for this overarching section.	Proposed that the text includes a link to Halton's State of the Borough annual report which includes up to date information of the Borough's designated sites, habitats and species. This report will be included as part of the evidence base for the Core Strategy.

Vision and Strategic Objectives

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
13	0	2	0	2	0

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Suggested amendment to Strategic Objective 3 so that it is not exclusively focused on the re-use of vacant and under-utilised employment areas, by adding "...and the selective release of key Greenfield sites in East Runcorn".	Strategic Objective 4 makes reference to science and business clusters which would include the East Runcorn employment areas of Daresbury Park and Daresbury Science and Innovation Campus. However, it is noted that Strategic Objective 3 could be improved by not exclusively referring to existing developed employment areas.	Amend Strategic Objective 3 to read "Create and sustain a competitive and diverse business environment offering a variety of quality sites and premises, with a particular emphasis on the revitalisation of existing vacant and underused employment areas"
2	Suggested amendment to Strategic Objective 10 to incorporate reference to designated sites and species.	It is felt that the Strategic Objective 10 could benefit from the suggested change to incorporate reference to designated sites and species to improve clarity.	Amend Strategic Objective 10 as per suggested change.

Policy CS1: Halton's Spatial Strategy

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
26	4	11	9	8	6

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	The recognition by the Publication Core Strategy that a Green Belt review may be necessary to meet development requirements of individual communities in the plan period up to 2016 is welcomed. However, it is considered that the Core Strategy should go further and commit itself to the review. It should also set out the broad locations where Green Belt changes are likely to be required and the likely type and quantum of land releases.	Although it is acknowledged that the policy should present more detailed information regarding the likely scale and trigger mechanisms for a potential Green Belt review it is not considered appropriate to set out the broad locations where green belt changes could occur. Where the strategic need for the release of Green Belt land is identified, then a full assessment of available and suitable Green Belt land will be undertaken as part of a Green Belt review and will be subject to public consultation.	Include further detail to policy CS6 and its justification regarding the likely scale and trigger mechanisms for a Green Belt review. This will include reference to the importance of a 5 year supply of land in Widnes/ Hale (and Runcorn) and the need to ensure that any review of potential release of Green Belt is comprehensive and would meet future housing circumstances and requirements across the Borough.
2	It is considered that the 2010 Strategic Housing Land Availability Assessment (SHLAA) significantly over-estimates the likely supply of deliverable and developable housing opportunities in	A comprehensive assessment of potential housing sites has been undertaken for the SHLAA process in accordance with Government guidance. This process assesses annually if sites are deliverable	No change required.

	<p>the period to 2016. This is particularly relevant for Sandymoor and the Daresbury Strategic Site given the past completion rate. It is also considered that the Council is being over-optimistic regarding the deliverability of the Runcorn Docks (Runcorn Waterfront) site and a number of other smaller sites. It is therefore considered that the exceptional circumstances required by PPG2 for alterations to approved Green Belt boundaries exist and land should be excluded from the Green Belt to meet the Borough's requirements in the plan period.</p>	<p>and developable. The trigger for Green Belt review would take into consideration the need to maintain a deliverable and developable supply of housing land in accordance with the SHLAA and current Government guidance.</p> <p>A stakeholder group oversees the production of the SHLAA each year and has agreed the inclusion of sites within the report. Therefore it is not felt that the tables need to be revised.</p>	
3	<p>The SHMA (draft) states that 43% of projected housing demand should be met north of the river. This proportion of the housing target to 2026 (8000 dwellings net) translates to 3440 dwellings. However the SHLAA only identifies sites for 3081 dwellings in the period up to 2026. With any reasonable level of discounting for lack of deliverability and developability, the shortfall increases from 319 dwellings to over 1200 dwellings. There is therefore an urgent need to review the Green Belt to meet the housing requirements of Widnes. Policy CS6 should be amended to require that the Green Belt should be revised to meet the</p>	<p>A supplementary housing paper has been developed for the Halton Core Strategy 'Determining a Housing Requirement for Halton' which considers the potential need for Green Belt review. This includes consideration of the SHMA (2010) analysis and the identified supply of potential land north of the Mersey through the SHLAA. This has shown the potential mismatch between demand and supply in the latter years of the core strategy.</p> <p>However, the analysis included in the paper shows that there is sufficient potential identified supply for Widnes/ Hale for in excess of 10 years with only modest deficit thereafter. It would therefore be premature for the Core Strategy to include</p>	<p>Publish housing paper 'Determining a Housing Requirement for Halton' to supplement the detail within CS1: Halton's Spatial Strategy and CS6: Green Belt during the additional consultation period alongside the Revised Proposed Submission Document.</p>

	development requirements of Widnes / Hale.	a full Green Belt review at this time. For this reason the Core Strategy raises the issue of potential future Green Belt review to ensure adequate flexibility exists to meet and address future housing circumstances and requirements throughout the plan period.	
4	Tables 1 and 2 in Policy CS1 are considered not be justified as the available evidence suggests that they are an overestimate of the deliverability and developability of potential housing sites. The tables should be revised to incorporate potential housing sites at North Widnes and a more accurate reflection of the deliverability/developability of other sites.	<p>The sites making up the housing figures in tables 1 and 2 are included within the SHLAA and have had their deliverability and developability tested through this process. A stakeholder group oversees the production of the SHLAA each year and has agreed the inclusion of sites within the report. Therefore it is not felt that the tables need to be revised.</p> <p>The potential of housing sites at North Widnes (taken to mean areas of land within the Green Belt) cannot be included in the potential housing supply tables as they are within the Green Belt, they do not benefit from a current allocation and are not proposed to be allocated in the Core Strategy.</p>	No change required.
5	North Widnes should be identified as an additional Key Area of Change in policy CS1 and there should be a separate North Widnes Key Area of Change as with those other area specific policies. There are a number of sites on the edge of the urban area at Widnes that are already included in the Council's Strategic Housing Land Availability Assessment. North Widnes	The inclusion of sites within the SHLAA at North Widnes does not mean that the Council is proposing major change in this area. The SHLAA process merely assesses those sites which have the potential to be developed for housing, but does not make allocations. This will be determined through the Site Allocations process and to a lesser extent through the designation of Strategic Sites in the Core Strategy.	No change required.

	is felt to be a sustainable location for further housing and employment development which can meet the Borough's future development needs.	<p>The designation of a Key Area of Change at North Widnes would be premature as it would occur before a full review of land within the Green Belt had taken place. Any Green Belt Review would include the thorough assessment of all Green Belt land across the Borough and would only take place if the trigger mechanisms indicated a need for development land.</p> <p>If such a Key Area of Change were to be designated, it would serve a limited purpose at this stage as any sites in the Green Belt would not be allocated for development until they were assessed through a Site Allocations DPD.</p>	
6	PPS3 (para 53 footnote 1) requires Core Strategy housing delivery policies to be expressed in terms of net additional dwellings. Policy CS1 does not do this, only referring to "additional new homes". Meanwhile, and inconsistent with Policy CS1, Policy CS3 refers to "new homes (net of demolitions)". However, demolitions are only one type of loss to the housing stock. There are other potential losses from changes of use etc.	Agree that clarification is required regarding how net homes is calculated, and that there are other ways dwellings can be lost besides demolitions.	Amend bullet one in policy CS1 to read 8000 <u>net</u> additional dwellings.
7	The housing target for CS1 is well below the likely housing need and demand in the area once the economic downturn ends. A target of	The target of 500 dwellings on average per annum will not constrain housing development in the future as this target is a minimum level that the Council wish to see	No change to the Core Strategy.

	500 dwellings per annum will constrain unnecessarily housing development in the future and a higher target is achievable.	achieved (see bullet one in policy CS3). Housing delivery above the levels set out in policy CS3 would therefore be acceptable. Although gross housing delivery in Halton has exceeded the 500dpa in six out of the last eight years, net housing delivery has generally fallen short of this level, with the only exceedance being in 2005/06. An allowance for demolitions of 34 dwellings per annum has been included in Halton's SHLAA 2010/11 for the period that the SHLAA covers.	
8	<p>Total housing provision for the plan period of 8000 dwellings has not been justified. The annual level of housing provision should be set at 400 dwellings and will provide modest growth for the Borough of 6400 new homes over the plan period. This would also avoid the need for Greenfield release, would improve the percentage of housing built on brownfield land and would lengthen the number of years of housing land supply.</p> <p>The provision of housing at this rate represents an over-provision of 34% above household growth rates, and does not represent a 'marginal increase'.</p>	<p>The Core Strategy housing target of an average of 500 dwellings per annum has been chosen with the view to stabilising the Borough's population after a number of years of decline and to provide a critical mass of residents to support community facilities etc.</p> <p>The target has been varied over the plan period to take into account the current period of economic downturn, with the belief that the economy will return to more buoyant times in the future. Whilst it is recognised that the level of 500 dwellings per annum is above the estimated level of household growth each year and cumulatively over the plan period, the intention as stated above is to stabilise the Borough's population and to provide the level of population needed to support the services and facilities that the current population desires.</p>	No change to the Core Strategy itself. The 'Determining a Housing Requirement for Halton' paper will be made available which provides a more detailed justification for the chosen housing target.

9	260ha of employment land is excessive and the 20% flexibility factor should be removed.	Comment noted, however it is felt that the inclusion of the flexibility factor will maintain choice through the availability of a range of employment sites in accordance with PPS4: Planning for Sustainable Economic Growth.	No change required.
10	It should be clearly established in the Core Strategy if a Green Belt Review is required because of the strategic nature of the issue. It is not felt that it would be appropriate to delay any Green Belt Review to a subsequent DPD.	Although it is acknowledged that the policy should present more detailed information regarding the likely scale and trigger mechanisms for a potential Green Belt review it is not considered appropriate to set out the broad locations where green belt changes could occur. Where the strategic need for the release of Green Belt land is identified, then a full assessment of available and suitable Green Belt land will be undertaken as part of a Green Belt review and will be subject to public consultation.	Include further detail to policy CS6 and its justification regarding the likely scale and trigger mechanisms for a Green Belt review. This will include reference to the importance of a 5 year supply of land in Widnes/ Hale (and Runcorn) and the need to ensure that any review of potential release of Green Belt is comprehensive and would meet future housing circumstances and requirements across the Borough.
11	Potential Areas of Search for Green Belt release should be indicated in the Core Strategy.	It is acknowledged that additional wording is required in the policy justification to set out the likely scale and trigger mechanisms for a Green Belt Review. However, it is not for the Core Strategy to identify Areas of Search on the Key Diagram. This would need to be fully considered through the review of Green Belt land only when the housing land supply across the Borough, and more specifically in Widnes/Hale, triggers such a review.	No change required.
12	Uncertainty over whether the preferred approach is compliant with national policy (PPG2: Green Belt).	The Council is aware of the need to comply with national policy, particularly PPG2: Green Belt in this instance. Exceptional circumstances are felt to exist	No change required.

		<p>as the need to remove land from the Green Belt stems from the need to ensure sufficient development land exists in Widnes to meet the future needs of the town, especially the demand for new housing. At present the housing land supply situation in the Borough indicates that there may be insufficient land in Widnes / Hale in the latter part of the Core Strategy plan period. As part of the SHLAA process, other potential development land within the Borough's urban areas has been considered for its suitability for housing and a Call for Sites exercise was incorporated into the Joint Employment Land and Premises Study to determine other sites which may be appropriate for employment uses in Halton.</p>	
13	<p>Concern that the proposal for Green Belt Release did not feature in previous stages of the Core Strategy such as in the Preferred Options document.</p>	<p>It is correct that the Green Belt policy was not included as part of the Preferred Options document. However, it is seen to be important to set out how future housing supply in the Borough may be met and the apparent mis-match of supply north and south of the Mersey. Through the proposed approach that the Council is putting forward in the Core Strategy, interested parties would have the opportunity to comment on any future potential Green Belt Review, and any potential sites proposed to be removed from the Green Belt, through an Allocations DPD.</p>	<p>No change required.</p>
14	<p>The mechanism that would trigger the release of sites in the Green Belt needs</p>	<p>Agree that the mechanism for Green Belt review needs to be included in the Core</p>	<p>Add further detail to policy CS6 regarding the mechanism for</p>

	<p>to be made explicit within the Core Strategy. In addition to this, Areas of Search should be shown on the Key Diagram. Any review of Green Belt boundaries should be completed by 2016 to allow any sites released to be available for development in line with when they are required to meet the Borough's development needs.</p> <p>Wording is suggested that could be added to policy CS1 in order to make clear when a Green Belt Review would be considered and detailing that it would be included within the Site Allocations and Development Management DPD.</p>	<p>Strategy. It is felt that detailed wording on the issue of Green Belt release should be added to policy CS6 but that the document needs to be consistent at other places which refer to securing a future housing land supply, such as CS1 and CS3.</p>	<p>triggering Green Belt release, in line with the suggestions under policy CS6. Ensure that policies CS1 and CS3 align with the amendments to CS6 by referring in broad terms to how and when a Green Belt Review would take place.</p>
15	<p>Clarity is needed in this policy on the exact time period that the plan covers.</p>	<p>The base date for the plan period is April 2010 (the monitoring year being 2010/11), with the plan extending until 2027/28 (extending to 15 years after the adoption of the plan which is currently programmed for late spring 2012). The extension of the Core Strategy plan period to 2027/28 is necessary as there is a requirement for the plan to cover a minimum period of 15 years from the date of adoption. The programmed adoption date for the Core Strategy was pushed back following delays to the production process of the document.</p>	<p>The plan period for the Core Strategy will be extended to end in April 2028 (the monitoring year 2027-28) to ensure compliance with PPS12 that the Core Strategy will extend for a minimum period of 15 years from the plan's adoption.</p>
16	<p>Clarity is needed on the net level of housing provision required for the period 2010-2016 including shortfalls.</p>	<p>Net level of housing provision from 2010-2016 would be 2600 homes (2010/11-2015/16). However, it is not felt that this</p>	<p>No change required.</p> <p>Publish housing paper 'Determining a</p>

		would be a necessary addition to CS1. With regard to shortfalls against the RSS targets, as it is the Government's intention to abolish RSS, the Council has decided to use a base date of April 2010 for the Core Strategy and therefore eradicating the shortfall built up between 2003-2010. An explanation to this is provided in the Determining a Housing Requirement for Halton paper which will be available alongside the Core Strategy.	Housing Requirement for Halton' to supplement the detail within CS1 during the additional consultation period alongside the Revised Proposed Submission Document.
17	Clarity is needed in this policy regarding the gross level of new homes to be provided in the period 2010-2016.	The gross level of housing provision for the period (2010/11-2015/16) would be 2804 homes (net number of new homes plus losses through demolitions at a rate of 34 homes per annum in accordance with the SHLAA). However it is not felt that this needs to be detailed in the Core Strategy.	No change required.
18	Clarity is needed in the policy regarding the impact of Growth Point on the housing provision requirements 2010-2015.	A 20% uplift on housing requirements for the period 2008/17 has not been applied to the housing requirement in the Core Strategy. The advice Halton Borough Council has received on this matter, from CLG (via Government Office) is that: "It is for growth locations to determine the level of growth they wish to pursue based on the local communities needs and aspirations - the RSS figures and associated 20% uplift for growth points are no longer a requirement." Confirmation has also been received from CLG that Growth Point funding will end, therefore there will be no funding available to local authorities to support the delivery of these additional	No change required.

		homes. It is now for local authorities to decide whether they wish to continue with the allowance for Growth Point of housing delivery at a level 20% above RSS targets and Halton has decided not to continue with the enhanced housing requirement.	
19	Paragraph 4.22 states that the rural character of the Borough's villages will be maintained through limits on development. It is suggested that this be amended as new sensitive and high quality development may be needed in villages to secure their long term future.	It is felt that the statement in para 4.22 is accurate as the Borough's villages within the Green Belt will have their character maintained through restrictions on development. Even though Hale village is inset within the Green Belt, development will need to reflect the character of the village.	No change required.
20	There is a requirement for Core Strategies to plan for a minimum period of 15 years from the date of adoption of the plan. This is set out in PPS3 in terms of housing provision. Currently the Core Strategy plan period extends to 2026, and if the plan is not adopted until January 2012 (as indicated in the current production timetable) then the plan would not have a plan period of at least 15 years. It is therefore considered that the end date of the plan should be 2031.	The base date for the plan period is April 2010 (the monitoring year being 2010/11). It is noted that the plan period as proposed does not extend to cover the required minimum period of 15 years from the adoption of the plan. Due to delays to the production of the plan, it is now anticipated that the plan will be adopted in April 2012 (in the monitoring year 20, meaning that in order to be in line with national policy the plan period must extend to April 2027 as a minimum. However we do not agree that the plan period should be extended to 2031, as much of the evidence base underpinning the Core Strategy does not extend to this time.	Amend Core Strategy plan period from ending in 2025/26 to finishing in 2026/27, to reflect the likely adoption date of April 2012.
21	Land at Manor Park IV (between Moore village and the urban area) is shown on the Key Diagram as	Agree that the key diagram, even though it is designed to be indicative only and not to be used in the same way as the UDP	Amend the Key Diagram to depict only strategic greenspaces (such as Victoria Park, Widnes and Town Park,

	<p>greenspace. The land in question at Manor Park IV does not play a strategic role and therefore it is wrong to identify it as greenspace.</p>	<p>Proposals Map, is misleading by depicting certain areas as greenspace. It is agreed that the area of land between the Green Belt and the urban area in Runcorn, south of the Manchester Ship Canal does not perform a strategic role as greenspace in the Borough.</p>	<p>Runcorn) which fulfil a multi-functional role in the Borough. Land in question at Manor Park IV to be shown as part of the urban extents.</p>
<p>22</p>	<p>Addition of wording regarding working with the Highways Agency, particularly with regard to the Key Areas of Change, to safeguard the performance of the Strategic Road Network.</p>	<p>Comments and suggested wording noted with regard to the identification and assessment of potential impacts from development proposals on the Strategic Road Network. However, it is not felt that CS1 is the appropriate policy to include such detailed wording, as it deals with the strategy for development across the Borough for the entire plan period.</p> <p>The Highways Agency has requested that similar wording be added to a number of policies within the plan, and it is not felt that it is necessary to include the same wording at several points through the plan. This approach has been discussed informally with the Highways Agency and they are content that the suggested wording only be included at one point in the document.</p>	<p>No change to policy CS1. Additional wording regarding continuous engagement with the Highways Agency to discern the impact of development on the Strategic Road Network ahead of allocating sites to be added to CS7: Infrastructure Provision.</p>

Policy CS2: Sustainable Development Principles

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
6	0	1	1	1	1

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Question if the Core Strategy vision for development to 'contribute towards the delivery of mixed and balanced communities' is contradictory when considered against the Borough's aim to considerably restrict development in smaller rural villages.	The delivery of 'mixed and balanced communities' is supported throughout the document. In particular Policy CS6: Green Belt, states that small scale development amounting to minor infilling within 'washed over' Green Belt rural settlements will be permitted where shown to be necessary to meet identified local needs. Infill development within Hale village, which is inset within the Green Belt, will also be viewed as appropriate where it would enhance the character of the village.	No change required.
2	Question if the policy could be practically monitored.	Please refer to Halton's Core Strategy Proposed Submission Document, Appendix 3: Monitoring Framework, which sets out how the policy will be monitored over the Core Strategy plan period.	No change required.
3	The policy should specifically identify	Agreed that reference to the	Add additional criteria to policy

No.	Comment Received	HBC Comment	Change Required
	that the Council will seek to encourage recycling as a means of meeting its sustainability objectives. As a result the Sustainable Development Principles should include an additional bullet encouraging recycling and sustainable waste management.	encouragement of recycling and sustainable waste management should be clearer through the sustainable development principles.	concerning the need to minimise energy and water use and make efficient use of natural resources including through sustainable waste management and maximising the re-use of recycled products.
4	Principles should make more overt reference to sustainable construction practices being used in new development.	Agreed that a bullet point which refers to sustainable construction practices would be an appropriate addition to the Sustainable Development Principles.	Add additional criteria to policy concerning the need to minimise energy and water use and make efficient use of natural resources including through sustainable waste management and maximising the re-use of recycled products.

Policy CS3: Housing Supply and Locational Priorities

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
22	0	13	12	11	7

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Policy figure should continue with 2003 base date from RSS (as this was date of evidence base).	Continuation of RSS figures which were based upon certain economic assumptions that have not materialised is not considered appropriate. Requirement to address current policy 'backlog' makes maintenance of rolling 5 year supply untenable. The proposed policy figure is based on the latest evidence base for the Borough.	No change required. The background paper 'Determining a Housing Requirement for Halton' sets out the current evidence and reasoning for the chosen policy figure.
2	Policy target should be 400 units per annum as 8,000 units is 34% above household projections of 5,952 households (16 x 372) and is not justified.	ONS Household Projections whilst providing useful background to inform policy formulation are not intended to determine policy. The proposed policy figure is felt to strike the right balance between growth and environmental constraints.	No change required. The background paper 'Determining a Housing Requirement for Halton' sets out the current evidence and reasoning for the chosen policy figure.
3	Any phasing should be for 600 units per annum during the Growth Point Period.	The advice Halton Borough Council has received on this matter, from CLG (via Government Office) is that: "It is for growth	No change required.

No.	Comment Received	HBC Comment	Change Required
		<p>locations to determine the level of growth they wish to pursue based on the local communities needs and aspirations - the RSS figures and associated 20% uplift for growth points are no longer a requirement." Confirmation has also been received from CLG that Growth Point funding will end, therefore there will be no funding available to local authorities to support the delivery of these additional homes. It is now for local authorities to decide whether they wish to continue with the allowance for Growth Point of housing delivery at a level 20% above RSS targets and Halton has decided not to continue with the enhanced housing requirement. Therefore the delivery of 600 units per annum is felt to be undeliverable in the short term.</p>	
4	<p>There is a lack of published/ available evidence to support the proposed phasing detailed in the policy.</p>	<p>Housing policy targets are not set by a defined formula and there is a degree of judgement involved. The proposed policy figure and phasing are felt to strike the right balance between growth and environmental constraints.</p>	<p>No change required.</p> <p>The background paper 'Determining a Housing Requirement for Halton' will set out the current evidence and reasoning for the chosen policy figure.</p>
5	<p>Is setting the housing target above the baseline projections justified given outstanding demand resulting from recent under supply?</p>	<p>The policy figure detailed in the policy is considered to be the most appropriate and deliverable.</p>	<p>No change required.</p>
6	<p>Tables 1 and 2 (and supporting evidence base) over estimate the deliverable housing supply and should</p>	<p>The figures are drawn from the Strategic Housing Land Availability Assessment (SHLAA) which is produced in consultation</p>	<p>No change required</p>

No.	Comment Received	HBC Comment	Change Required
	be revised to include a North Widnes Key Area of Change.	with an independent stakeholder group and are considered a robust assessment of potential supply.	
7	The policy should recognise the possible contribution of rural brownfield sites to future housing supply.	The policy precedence for brownfield development is contained in CS1. This does not differentiate between urban and rural sites.	No change required
8	Policy justification should recognise development potential of Widnes Golf Course dependant upon suitable replacement. It is, however, recognised that this would be determined in an Allocations DPD.	Widnes Golf Course is considered to form part of the Borough's strategic greenspace. Issues of site specific housing allocations (outside of Strategic Sites) are not appropriate for the Core Strategy. The development potential of the Golf Course to meet future housing needs would only be considered and determined through evidence base documents including the Strategic Housing Land Availability Assessment (SHLAA), the potential future Green Belt review and a review of greenspace in the Borough. These evidence base documents would then inform a Site Allocations DPD or equivalent.	No change required
9	In terms of Green Belt release there is a lack of clarity as to the quantum; timing or trigger mechanisms.	It is acknowledged that additional wording is required in the policy to set out the likely scale and trigger mechanisms for a Green Belt Review.	Include further detail to policy CS6 and its justification regarding the likely scale and trigger mechanisms for a Green Belt review. This will include reference to the importance of maintaining a 5 year supply of land in Widnes/ Hale (and Runcorn) and the need to ensure that any review of potential release of Green Belt is comprehensive and would meet

No.	Comment Received	HBC Comment	Change Required
			future housing circumstances and requirements across the Borough.
10	Concern that the release of Green Belt land at an early stage of the plan period could potentially harm St Helen's ability to meet its own housing needs and the Council's aim of delivering urban regeneration.	Comment noted. The background paper 'Determining a Housing Requirement for Halton' will consider further the scale and effect of a potential future Green Belt review.	Publish housing paper 'Determining a Housing Requirement for Halton' to supplement the detail within CS6: Green Belt during the additional consultation period alongside the Revised Proposed Submission Document.
11	It is not clear what consideration has been taken for a sub-regional approach and the need to avoid cumulative impact of Green Belt release, in line with PPG2. Would prefer the agreement of LCR and neighbouring authorities through a joint review or specific consultation, to discuss any proposed release of land from the Green Belt.	Agree that further consideration should be given to a sub-regional approach to add clarity to the policy.	Add further policy justification to clarify the approach and ensure a coordinated and strategic approach is taken when necessary.
12	No evidence of consideration of cross-boundary effects of revised policy base date.	Comment noted. Detail of level and justification of potential requirement set out in background paper.	No change required. Background paper will set out potential level and effect of proposed approach.
13	Brownfield target should be 50% in line with government priorities; to avoid oversupply of greenfield sites; stimulate urban regeneration and avoid triggering greenbelt review.	Comment noted. Current evidence suggests 60% brownfield target is unachievable (at proposed policy level). 40% target is considered to be challenging but deliverable.	No change required.
14	Policy makes reference to UDP allocations but Daresbury SIC expansion will impinge on previously	Policy CS11 does seek to incorporate detailed amendments to previously allocated (UDP) uses. Comments within	References to UDP housing allocations to be amended.

No.	Comment Received	HBC Comment	Change Required
	identified housing allocation and therefore the reference inaccurate.	CS3 potentially misleading.	
15	Policy is not consistent with PPS3 with regard to actions where an ongoing 5 year supply cannot be identified.	Comment noted. Policy seeks to set out 'proactive' actions LPA will take where 5 year land supply not demonstrated, rather than repeat 'reactive' Development Management consequences.	Policy and justification wording to be amended.
16	5 year supply definition lacks clarity.	Comment noted.	Policy to be amended to read under Maintaining s 5 year supply: "In accordance with the relevant annual targets..." to add clarity to the policy.

Policy CS4: Employment Land Supply and Locational Priorities

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
14	0	3	3	1	1

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	20% flexibility factor applied to long term average take-up rates to maintain a range and choice of sites should be removed.	Comment noted, however it is felt that the inclusion of the flexibility factor will maintain choice through the availability of a range of employment sites in accordance with PPS4: Planning for Sustainable Economic Growth.	No change required.
2	Employment land requirement of 260ha for the plan period is too low and should be increased to that referred to in the Joint Employment Land and Premises Study (JELPS) (a total requirement of 326.56ha). The employment land requirement should be increased further if the plan period were to be extended to 2031 as requested in representations on CS1.	Disagree with the suggestion that the employment land requirement is too low for plan period. The draft Liverpool City Region Housing and Economic Development Evidence Base Overview Study suggests that given that Halton's employment land requirement within the Joint Employment Land and Premises Study has been calculated based on rolling forward historic trends, this may potentially represent an over-representation of need.	No change required.

No.	Comment Received	HBC Comment	Change Required
		<p>The employment land requirement stated within the evidence base has been slightly adapted to be more realistic and also to take into account the employment completions since the base date of the study in April 2008.</p>	
3	<p>The economy is not currently in a period of recession and was only ever in a recession for one quarter. No robust evidence is provided to suggest that the economic downturn will continue until 2015, and the employment land requirement should not be reduced by 20% to reflect economic downturn as there may be increased levels of employment land take up when the economy begins to grow again through pent-up demand.</p>	<p>With regard to the references to the current economic recession, it is noted that the UK is no longer in a period of recession but the country is undoubtedly in a period of economic downturn as noted. The evidence regarding the recession lasting until 2015 has been taken from the Regional Economic Forecasting Panel's report State of the Northwest Economy (March 2010). Applying a reduced requirement for employment land for the initial part of the plan period is also in line with the reduced housing target of 400 units per annum for the first part of the plan period.</p> <p>Whilst the comments regarding the existence of pent up need when the economy recovers from the downturn are noted, it is felt that the inclusion of the 20% flexibility factor allows for fluctuations in demand between years. It is felt that the right balance between the current poor economic situation and planning for the future upturn has been struck.</p>	<p>Add footnote at para 7.4 to Regional Economic Forecasting Panel's report State of the Northwest Economy (March 2010) regarding the predicted length of the economic downturn.</p>
4	<p>Current UDP allocations should not be</p>	<p>With regard to the identification of current</p>	<p>Include footnote under Table 3 and</p>

No.	Comment Received	HBC Comment	Change Required
	included within the supply figures for employment land for the Core Strategy.	UDP allocations as contributing towards employment land supply, it is agreed that the suitability of existing allocations will ultimately be assessed as part of the Site Allocations DPD. However, existing employment allocations which have not been taken-up were reassessed as part of the Joint Employment Land and Premises Study and those included within Table 3 (outstanding employment land allocations at April 2010) are only those deemed suitable for future employment land use. It is agreed that this should be footnoted under Table 3 and where reference is made to currently allocated sites in policy CS4.	under policy CS4 stating that this only includes current UDP allocations which have been reassessed as being suitable for employment uses through the JELPS.
5	Policy requires the retention of all sites currently in employment use except in exceptional circumstances, however, Table 3 shows a potential surplus of employment land (if all regeneration and remodelling opportunities are taken forward). The final sentence of Paragraph 7.6 states that there are no issues with employment land supply in the Borough.	Apparent contradiction within policy noted. However, in reality it is extremely unlikely that all of the potential remodelling and regeneration opportunities will come forward and therefore it is unlikely that there will be an actual oversupply of employment land in the Borough. Table 3 does not state that there is an oversupply of employment land, merely a potential surplus, which is caveated below the table.	Amend final sentence of para 7.6 to state that if all of the remodelling and regeneration opportunities are taken forward, there could be a potential oversupply of employment land in the Borough.

Policy CS5: A Network of Centres

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
20	0	6	0	3	3

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Policy should define small scale retail as 280 Sqm <u>net</u> in line with Sunday Trading Act 1994.	Agree policy should be amended to add clarity and to be consistent with Sunday Trading Act.	Policy wording to be amended to include "net".
2	Policy should state whether the figures are Net or Gross to avoid confusion (suggest Gross).	Figures are drawn from Halton Retail and Leisure Study (2009) and are indeed 'Gross'.	Amend policy to clarify floorspace capacities are 'gross'.
3	The term "Bulky Goods" has no specific meaning in planning terms.	Comment noted. Split taken from Halton Retail and Leisure Study (2009) which seeks to differentiate between 'high street' and 'retail warehouse' floorspace requirements, which is difficult given overlap.	Additional clarification regarding "Bulky Goods" to be added to the policy justification.
4	The Core Strategy should state clearly those sites which are committed for retail development such as East Lane (Halton Lea) extant foodstore consent.	Comment noted.	Reference to significant extant retail proposals to be included within the policy justification as background.
5	Core Strategy should support delivery of East Lane (Halton Lea) site for the	Comment noted, however, the Core Strategy makes reference to floorspace	No change required.

No.	Comment Received	HBC Comment	Change Required
	development of this foodstore to assist in the regeneration of Halton Lea town centre as a whole.	capacity in and around Halton Lea but does not seek to prejudge the subsequent Site Allocations and Development Management DPD that will identify specific sites.	
6	Policy and justification (Para 8.5) should make specific reference to need for large format convenience retail on the edge of Widnes Town Centre (especially Tanhouse Yard site).	Site is allocated in currently adopted UDP, and subject to current redevelopment proposals. The Core Strategy makes reference to floorspace capacity in and around Widnes Town Centre but does not seek to prejudge the subsequent Site Allocations and Development Management DPD which will identify specific sites.	No change required.
7	Policy should be amended in line with PPS4 Policy EC 14 to require sequential assessments of all retail proposals in excess of 200 sqm gross not within a defined town centre or allocated in the LDF.	Comment noted, however amendment would simply repeat national policy.	No change required.
8	The Council should identify a Primary Shopping Area for Widnes, which should include the site of the proposed Tesco store.	Definition of Primary and Secondary shopping frontages are considered more appropriate to the Site Allocations and Development Management DPD as boundaries will be periodically reviewed over the life of the Core Strategy.	No change required.
9	Downgrading of Runcorn Old Town centre to a District Centre may create a negative impact.	Classification as a District Centre is most appropriate given the centre's size and function and is intended to support and protect the centre rather than downgrade it. This is a technical issue and does not affect the name or branding of the centre.	No change required.

No.	Comment Received	HBC Comment	Change Required
10	Importance of independent retailers to Runcorn Old Town is not properly recognised.	Comment noted. The role of Runcorn Old Town as a focus for local independent shops, niche retailers and service providers is referred to within paragraph 13.5 of policy CS10: West Runcorn. Further detail would be included in the Runcorn Old Town SPD.	No change required.
11	All existing retail and service provision including those within rural areas, should be supported and recognised as important sources of employment.	It is not considered appropriate to place a blanket presumption in favour of the retention of all retail and service facilities, regardless of location or viability. However recognition should be given to the role that individual shops can play in supporting small neighbourhoods and rural communities. It is anticipated that further detail on the scale of retail uses that may be appropriate in out-of-centre locations will be included in the Development Management and Site Allocations DPD.	Additional clause in policy to recognise role of other small scale retail and service provision serving a purely local catchment outside of defined centres.
12	Capacity figures table should include split between convenience and comparison goods floorspace allocations as set out in this policy.	Comment noted.	Amend policy to include differentiation between convenience and comparison goods.
13	Policy should make clear whether floorspace capacity figures quoted include outstanding commitments.	Floorspace capacity figures exclude current commitments.	Make minor amendments to policy and justification wording to add clarity.
14	The floorspace capacity table should be omitted and reference simply be made to the 'Retail and Leisure Study (GVA Grimley 2009) or subsequent updates' as the retail market and therefore the development of new	It is noted that the capacity figures quoted represent a snap-shot in time and the policy contains reference that these may be revisited within the Core Strategy period, however, it is felt important to quantify the levels of floorspace that	No change required.

No.	Comment Received	HBC Comment	Change Required
	retail floorspace is dynamic, and the policy could quickly become out of date.	subsequent DPDs should be making provision for.	

Policy CS6: Green Belt

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
22	0	9	8	8	5

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	The recognition by the Publication Core Strategy that a Green Belt review may be necessary to meet development requirements of individual communities in the plan period up to 2016 is welcomed. However, it is considered that the Core Strategy should go further and commit itself to the review. It should also set out the broad locations where Green Belt changes are likely to be required and the likely type and quantum of land releases.	Although it is acknowledged that the policy should present more detailed information regarding the likely scale and trigger mechanisms for a potential Green Belt review it is not considered appropriate to set out the broad locations where Green belt changes could occur. Where the strategic need for the release of Green Belt land is identified, then a full assessment of available and suitable Green Belt land will be undertaken as part of a Green Belt review and will be subject to public consultation.	Include further detail to policy CS6 and its justification regarding the likely scale and trigger mechanisms for a Green Belt review. This will include reference to the importance of maintaining a 5 year supply of land in Widnes/ Hale (and Runcorn) based on the level of need for the individual towns and the need to ensure that any review of potential release of Green Belt is comprehensive and would meet future housing circumstances and requirements across the Borough.
2	It is considered that the 2010 Strategic Housing Land Availability Assessment (SHLAA) significantly over-estimates the likely supply of deliverable and	A comprehensive assessment of potential housing sites has been undertaken for the SHLAA process in accordance with Government guidance. This process	No change required.

No.	Comment Received	HBC Comment	Change Required
	<p>developable housing opportunities in the period to 2016. This is particularly relevant for Sandymoor and the Daresbury Strategic Site given the past completion rates. It is also considered that the Council is being over-optimistic regarding the deliverability of the Runcorn Docks (Runcorn Waterfront) site and a number of other smaller sites. It is therefore considered that the exceptional circumstances required by PPG2 for alterations to approved Green Belt boundaries exist and land should be excluded from the Green Belt to meet the Borough's requirements in the plan period.</p>	<p>assesses annually if sites are deliverable and developable. The trigger for Green Belt review would take into consideration the need to maintain a deliverable and developable supply of housing land in accordance with the SHLAA and current Government guidance.</p> <p>A stakeholder group oversees the production of the SHLAA each year and has agreed the inclusion of sites within the report. Therefore it is not felt that the tables need to be revised.</p>	
3	<p>The draft Strategic Housing Market Assessment (SHMA) states that 43% of projected housing demand should be met north of the river. This proportion of the housing target to 2026 (8000 dwellings net) translates to 3440 dwellings. However the SHLAA only identifies sites for 3081 dwellings in Widnes in the period up to 2026. With any reasonable level of discounting for lack of deliverability and developability, the shortfall increases from 319 dwellings to over 1200 dwellings. There is therefore an urgent need to review the Green Belt to</p>	<p>A supplementary housing paper has been developed for the Halton Core Strategy 'Determining a Housing Requirement for Halton' which considers the potential need for Green Belt review. This includes consideration of the SHMA (2010) analysis and the identified supply of potential land north of the Mersey through the SHLAA. This has shown the potential mismatch between demand and supply in the latter years of the Core Strategy.</p> <p>However, the analysis included in the paper shows that there is sufficient potential identified supply for Widnes/ Hale</p>	<p>Add to the justification to the Green Belt policy regarding the existing housing land supply situation in Widnes, which can be used to broadly indicate when a review of Green Belt boundaries may be needed in order to maintain a sufficient level of supply.</p> <p>Publish housing paper 'Determining a Housing Requirement for Halton' to supplement the detail within CS6: Green Belt during the additional consultation period alongside the Revised Proposed Submission Document.</p>

No.	Comment Received	HBC Comment	Change Required
	meet the housing requirements of Widnes. Policy CS6 should be amended to require that the Green Belt should be revised to meet the development requirements of Widnes / Hale.	for in excess of 10 years with only modest deficit thereafter. It would therefore be premature for the Core Strategy to include a full Green Belt review at this time. For this reason the Core Strategy raises the issue of potential future Green Belt review to ensure adequate flexibility exists to meet and address future housing circumstances and requirements throughout the plan period.	
4	If such a need exists for a Green Belt review to be required this should be clearly established within the Core Strategy as a strategic issue. There is a need to set out the detailed approaches and mechanisms associated with a Green Belt review and a more accurate indication of potential areas of search considered suitable for release during the plan period.	Comment agreed and acknowledged.	Include further detail to policy CS6 and its justification regarding the likely scale and trigger mechanisms for a Green Belt review. This will include reference to the importance of maintaining a 5 year supply of land in Widnes/ Hale (and Runcorn) and the need to ensure that any review of potential release of Green Belt is comprehensive and would meet future housing circumstances and requirements across the Borough.
5	Since the supporting document 'Determining a Housing Target for Halton' and the Overview Study have not been published alongside the Core Strategy Proposed Submission version there appears to be a gap in the available evidence against which to consider the soundness of this policy approach.	The supporting / evidence base documents referred to were available to the Council in draft format prior to consultation of the Proposed Submission Document and hence have been used to influence the approach taken for policy CS6: Green Belt. These documents were due to be finalised and available during the consultation period; however, due to unforeseen circumstances this failed to be the case. It has now been agreed to re-	The Core Strategy Proposed Submission document alongside its supporting documentation and evidence base is to be re-published for a 6 week consultation period.

No.	Comment Received	HBC Comment	Change Required
		publish the Core Strategy Proposed Submission document, which will allow comments to be made in relation to these documents.	
6	There is concern that this proposal (Green Belt review) did not feature in the Halton Core Strategy Preferred Options Report and therefore this Proposed Submission document represents the first opportunity for stakeholders to comment on this issue.	It is correct that the Green Belt policy was not included as part of the Preferred Options document. However, it is seen to be important to set out how future housing supply in the Borough may be met and the apparent mis-match of supply north and south of the Mersey. Through the proposed approach that the Council is putting forward in the Core Strategy, interested parties would have the opportunity to comment on any future potential Green Belt Review, and any potential sites proposed to be removed from the Green Belt, through an Allocations DPD.	No change required.
7	There is currently insufficient explanation as to how and when such review would take place.	Comment agreed and acknowledged.	Include further detail to policy CS6 and its justification regarding the likely scale and trigger mechanisms for a Green Belt review.
8	The policy needs to clearly set out the steps necessary to give effect to the Green Belt Review including defining the Areas of Search on the Key Diagram and identifying potential housing sites within these areas in the Site Allocations and Development Management DPD.	It is acknowledged that additional wording is required in the policy justification to set out the likely scale and trigger mechanisms for a Green Belt Review. However, it is not for the Core Strategy to identify Areas of Search on the Key Diagram. This would need to be fully considered through the review of Green Belt land only when the housing land supply across the Borough, and more specifically in Widnes/Hale	No change required.

No.	Comment Received	HBC Comment	Change Required
		triggers, such a review.	
9	There is no reference relating to Green Belt in terms of proximity to Knowsley Metropolitan Borough Council.	Comment noted. This is a detailed matter and would be considered further as part of a potential future Green Belt review. It should be acknowledged that further details concerning the sub-regional approach to a future review of Green Belt will be included within the policy justification and the housing paper 'Determining a Housing Requirement for Halton'.	No change required.
10	Suggest that the needs and requirements of rural communities are not overlooked as part of the Green Belt review to ensure that any land release further supports the long term viability of these settlements.	The needs and requirements of the Borough's rural communities would be considered fully through a potential future Green Belt review.	No change required.
11	Consider that to restrict development to "minor infilling" within the washed over Green Belt settlements of Daresbury, Moore and Preston in the Hill is too narrow. A small group of affordable housing units would not extend to such a narrow definition. The settlement of Daresbury should be inset, rather than washed over Green Belt.	It is considered appropriate to restrict development in the Borough's rural villages to "minor infilling". This has taken into consideration the character, context and infrastructure of the villages referred to in the representation. It should however be acknowledged that paragraph 9.7 of policy CS6: Green Belt does identify that the provision for affordable housing may be necessary to maintain or enhance the sustainability of rural communities, in accordance with the principles in PPG2: Green Belt. Any proposals for such development within Halton's Green Belt villages would need to demonstrate	No change required to policy CS6: Green Belt. In line with representations made to policy CS13: Affordable Housing, include additional paragraph referring to meeting the affordable housing needs of rural communities in the justification to CS13 after paragraph 16.9.

No.	Comment Received	HBC Comment	Change Required
		specific local need. Further reference to affordable housing in rural communities is also to be included as part of CS13: Affordable Housing.	
12	Concern that the release of Green Belt land at an early stage of the plan period could potentially harm St Helen's ability to meet its own housing needs and the Council's aim of delivering urban regeneration.	Comment noted. The background paper 'Determining a Housing Requirement for Halton' will consider further the scale and effect of a potential future Green Belt review.	Publish housing paper 'Determining a Housing Requirement for Halton' to supplement the detail within CS6: Green Belt during the additional consultation period alongside the Revised Proposed Submission Document.
13	It is not clear what consideration has been taken for a sub-regional approach advocated by RSS, the LCR Overview Study, the LCR Spatial Development Plan and the need to avoid cumulative impact of Green Belt release, in line with PPG2. Would prefer the agreement of LCR and neighbouring authorities through a joint review or specific consultation, to discuss any proposed release of land from the Green Belt.	Agree that further consideration should be given to a sub-regional approach to add clarity to the policy.	Add further policy justification to clarify the approach and ensure a coordinated and strategic approach is taken when necessary.
14	The scope of any future Green Belt review should not be restricted at this stage and flexibility in both the delivery of developable land and Green Belt review is important.	It is noted that the scope of any future Green Belt review is not currently indicated in the Core Strategy. Through the addition of wording regarding the scale of Green Belt review that may be required in the future. It is considered that this will provide further detail as to the scope of any such review. However any review of Green Belt land will be undertaken as part of the	No change required.

No.	Comment Received	HBC Comment	Change Required
		evidence supporting a subsequent Site Allocations DPD (or equivalent). The delivery of developable land would be considered as part of the Green Belt to inform the Site Allocations DPD.	
15	The exception of an area to the east of LJLA from the general extent of the Green Belt is inconsistent with the reference to Hale Village in the Vision and Strategic Objectives.	Although the vision states that the Borough's Green Belt continues to provide a vital resource for current and future residents and keeping important spaces between settlements, it also refers to protecting the character of Hale Village and ensuring that any negative impacts associated with the expansion at LJLA are minimised.	Development of a Liverpool John Lennon Airport Topic Paper to supplement the policy approach being taken for the future of Liverpool John Lennon Airport.

Policy CS7: Infrastructure Provision

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
6	0	1	0	1	0

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Clarity is sought on the general approach to the Community Infrastructure Levy (CIL) being proposed by the Council. Any CIL Charging Schedule must be prepared as a separate document (and not as part of another DPD) if the Council wishes to adopt a tariff based approach.	Comment noted. It is acknowledged that the policy should be clearer on its intended future approach with regards to CIL. It is noted that if a Charging Schedule is to be produced, this must be a separate document to any DPD. The Council has not made a firm decision on this matter and hence the policy was intended to incorporate flexibility for the ultimate future approach.	Make additions to the policy regarding the range of policy documents that could be used to secure planning obligations, these being Site Allocations and Development Management DPD, CIL Charging Schedule or Developer Contributions SPD.
2	Addition of wording regarding working with the Highways Agency, particularly with regard to the Key Areas of Change, to safeguard the performance of the Strategic Road Network.	Comments and suggested wording noted with regard to the identification and assessment of potential impacts from development proposals on the Strategic Road Network. The Highways Agency has requested that similar wording be added to a number of	Add additional wording to policy summarising the essence of the suggested wording change regarding continuing to work with stakeholders and infrastructure providers to ensure adequate provision of infrastructure in the future. Also add further detail to the Infrastructure Plan regarding the

No.	Comment Received	HBC Comment	Change Required
		<p>policies within the plan, and it is not felt that it is necessary to include the same wording at several points through the plan. This approach has been discussed informally with the Highways Agency and they are content that the suggested wording only be included at one point in the document. It is proposed that the additional wording would be best placed within this policy (Infrastructure Provision) as this considers infrastructure needs over the plan period.</p>	<p>need to safeguard the performance of the Strategic Road Network in response to increased traffic from new developments.</p>
3	<p>Expand wording to refer to linking housing delivery to delivery of necessary infrastructure (especially water treatment infrastructure) to avoid adverse effects on European sites.</p>	<p>Suggest that this detailed reference to new water treatment infrastructure does not need to be in the infrastructure policy in the Core Strategy, and that instead it can be included within the Infrastructure Plan with suitable cross-referencing.</p> <p>It is noted that this comment replicates one of the recommendations made in the Habitats Regulations Assessment of the Proposed Submission Core Strategy.</p>	<p>No change to the Core Strategy. Add reference to the need for water treatment works to support new development and avoid adverse effects on European sites to the Infrastructure Plan supporting the Core Strategy.</p>

Policy CS8: 3MG

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
3	0	1	0	1	0

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Strengthen wording with regard to the protection of the Mersey Estuary SPA/Ramsar beyond simply "conserving" to "avoid adverse effects on the integrity..." to be in accordance with Habitats Regulations Assessment.	<p>Comment and suggested wording change noted.</p> <p>It is noted that this comment replicates one of the recommendations made in the Habitats Regulations Assessment of the Proposed Submission Core Strategy.</p>	Amend the second principle of development in policy CS8 as per suggested change.

Policy CS9: South Widnes

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
6	0	5	4	5	2

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	To ensure compliance with the Habitats Directive the policy should include text that identifies the need to ensure that development in this area does not result in a net reduction in supporting habitat for SPA/Ramsar waterfowl.	In order to be in compliance with the Habitats Regulations, it is agreed that Policy CS9: South Widnes should be amended to ensure that development does not result in a net reduction in supporting habitat SPA/Ramsar waterfowl. It is noted that this comment replicates one of the recommendations made in the Habitats Regulations Assessment of the Proposed Submission Core Strategy.	Amend additional criteria to 'Principles of Development' section to avoid potential adverse effects on the integrity of the Mersey Estuary SPA and/or Ramsar site.
2	The site at Tanhouse Yard, Widnes, should be identified on the South Widnes diagram.	The site referred to is part of the Widnes Town Centre area shown in Figure 9: South Widnes Diagram. More detailed matters will be dealt with as part of the Development Management process or the Site Allocations and Development Management DPD.	No change required.

No.	Comment Received	HBC Comment	Change Required
3	It is considered that CS9 does not recognise the constraints of Widnes Town Centre to accommodate retail development needs and that attention should be drawn to the strategic role which the site at Tanhouse Yard can fulfil as an edge of centre location.	The policy aims to focus retail provision in Widnes Town Centre with additional provision across the South Widnes area where appropriate. The Site Allocations and Development Management DPD will identify sites for future retail development in line with the capacity identified and in accordance with CS5: A Network of Centres for Halton.	Policy CS9 should make reference to policy CS5: Network of Centres for Halton to ensure that the Town Centre Boundary is prioritised for retail development throughout the plan period.
4	Supporting text should recognise the wider regeneration opportunities for Albert Square Shopping Centre.	Agreed that reference to the redevelopment of Albert Square Shopping Centre is potentially misleading and should be amended to include opportunities to regenerate the centre.	Amend justification to refer to potential regeneration opportunities for the Albert Square Shopping Centre.
5	Considered that new retail provision in Widnes Town Centre should be prioritised towards the Albert Square Shopping Centre.	It is agreed that Albert Square Shopping Centre occupies a key, strategic, location within Widnes Town Centre, and as part of the wider town centre boundary is one of the priority locations for retail investment. Its inclusion within the Town Centre boundary will ensure that retail investment is directed towards the Centre.	Amend policy CS9 to clarify the role of the Widnes Town Centre Boundary (as set out through policy CS5: A Network of Centres) to ensure that the area within the Widnes Town Centre Boundary is prioritised for retail development.

Policy CS10: West Runcorn

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
9	0	2	1	2	1

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Greater commitment should be given to managing the potential impacts of pollution on the Mersey Estuary SPA / Ramsar in regard to the development of the Mersey Gateway Port. Future development of the Mersey Gateway Port and any associated channel construction or dredging activities should only be permitted subject to the completion of an environmental assessment to avoid potentially significant effects on the Mersey Estuary SPA/Ramsar.	<p>Agreed that the policy wording for West Runcorn, and more specifically the future development of the Mersey Gateway Port, needs to include a greater commitment to avoiding potentially significant effects on the Mersey Estuary SPA/ Ramsar.</p> <p>It is noted that this comment replicates one of the recommendations made in the Habitats Regulations Assessment of the Proposed Submission Core Strategy.</p>	Add additional bullet to the 'Principles of Development' and corresponding justification to ensure the avoidance of potential significant effects caused by the development of the Mersey Gateway Port, including associated channel construction or dredging activity.
2	To ensure compliance with the Habitats Directive the policy should include text that identifies the need to ensure that development in this area does not result in a net reduction in	In order to be in compliance with the Habitats Regulations, it is agreed that Policy CS10: West Runcorn should be amended to ensure that development does not result in a net reduction in	Add additional bullet to 'Principles of Development' to avoid potential adverse impacts on the integrity of the Mersey Estuary SPA and/or Ramsar site.

No.	Comment Received	HBC Comment	Change Required
	supporting habitat for SPA/Ramsar waterfowl.	supporting habitat SPA/Ramsar waterfowl. It is noted that this comment replicates one of the recommendations made in the Habitats Regulations Assessment of the Proposed Submission Core Strategy.	
3	Additional wording requested to emphasise that the impact of new housing and employment sites (individually and cumulatively) on the operation of the Strategic Road Network (SRN) in partnership with the Highways Agency.	It is agreed that further reference to the SRN could be made in the Core Strategy, this would be most appropriate in CS7: Infrastructure Provision.	No change required to this policy. Additional wording regarding the need to continue to work with the Highways Agency to assess the impact of development on the Strategic Road Network.
4	The policy would be enhanced through reference to the Bridgewater Way Initiative and the need for works which may affect the integrity of the Canal or linkages to the towpath to be approved by the Canal owner.	Reference to the Bridgewater Way initiative would be appropriate within the Core Strategy. However, the need to consult the Canal owner for any works that might affect the integrity of the canal or linkages to the towpath should be set out within the Site Allocations and Development Management DPD.	Add reference to the Bridgewater Way Initiative in the justification.
5	The policy should include reference to alternatives to the reinstatement of the Runcorn Lock. In the event that reinstatement should proceed Peel and the Manchester Ship Canal would need to be satisfied that a number of criteria is met.	Such a reference is not considered appropriate within the policy as only the potential of reinstatement is referred to. Adding such a reference would undermine the protection of the alignment through the Site Allocations and Development Management DPD. However, it is acknowledged that more detailed wording and criteria regarding the reinstatement of the Locks should be set out within the Site Allocations and	No change required.

No.	Comment Received	HBC Comment	Change Required
		Development Management DPD.	
6	Reference should be made to the operational issues of recreational navigation on the Manchester Ship Canal.	Although the policy makes reference to recreational opportunities where commercially appropriate, it is thought that this could be made clearer through the justification.	Add additional text to the justification referring to the operational issues of navigation on the Manchester Ship Canal.
7	Concern is raised with regard to the justification in that it implies that a series of further policy documents will be required for Runcorn Waterfront. The role of the SPD in the short term and the Site Allocations and Development Management DPD in the longer term should be clarified.	<p>The Council does not see that it is necessary to distinguish the roles of the SPD and DPD in the Core Strategy. The justification to the policy is considered adequate and does not imply that a series of future policy documents will need to be produced. Any development scheme will be subject to the Development Management process and should accord with adopted planning policy documents.</p> <p>It should be noted that sites should not be allocated for development in a SPD.</p>	No change required.

Policy CS11: East Runcorn

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
41	2	11	7	9	3

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Tables 6 and 7 (Transport Infrastructure Requirements) within this policy refers to "Delivery of spine road to link the A56 at Delph Lane with Keckwick Lane, including bridge over Bridgewater Canal and potential bus link to Daresbury Park" within Phase 2. This should be moved to Phase 1 as this piece of infrastructure is integral to the Daresbury Regional Growth Fund (RGF) bid.	The phasing of infrastructure within the Proposed Submission Core Strategy was based on the best information available to officers at the time of drafting. The RGF bid was not produced at this time. We welcome the clarification received from the private sector partner on this matter.	Amend phasing of spine road and Keckwick Lane canal bridge from Phase 2 to Phase 1 in Tables 6 and 7 under policy CS11.
2	Route of the spine road through the site and bridging points as shown in Figure 12 (Daresbury Strategic Site) are too prescriptive and will be resolved through further masterplanning, development briefs and planning applications.	It is noted that further work will be required to discern the best route for the spine road and the Council is in ongoing discussions with those parties likely to be responsible for the delivery of such strategic infrastructure. Whilst the Council do not disagree with the principle of stipulating that the route of the	Revise route of spine road on Figure 12 (Daresbury Strategic Site) within the policy following discussions and the receipt of further information from likely developers of the site. Alter the notation in the key to stipulate the new vehicular link is indicative and

No.	Comment Received	HBC Comment	Change Required
		spine road is indicative, the Council feels that the final route of the spine road cannot be left to planning application stage and detail as to the preferred location for the spine road should be included in the Core Strategy.	add further detail to the policy justification regarding the requirements for the spine road (i.e. linking A56 to A558, crossing the Bridgewater Canal south of existing Delph Lane bridge, providing the potential to link to Daresbury Park).
3	Table 7 - Quantum of employment floorspace anticipated at Daresbury SIC in Phase 1 is too low and could restrict the effective development of the area.	It is not intended that the quantum of development referred to in each phase in Table 7 will limit the amount of development that can take place. The table indicates when specific pieces of infrastructure are required in relation to the completion of development. Nonetheless, the quantum of development anticipated to come forward in Phase 1 at the SIC can be increased.	Amend total employment floorspace referred to in Table 7 to 25,000sqm to be completed in Phase 1 at Daresbury SIC.
4	<p>Disagreement with Figure 12 which depicts land currently allocated as housing land in the UDP (Reference 8045, Delph Lane East) being proposed for employment use. Additionally, the level of housing referred to within the Central Housing Area cannot be achieved without the inclusion this land.</p> <p>A supplementary plan was also submitted detailing a suggested additional area of land as a potential new housing allocation to the north of Daresbury Business Park and to the</p>	<p>Whilst it is noted there is not agreement with the proposed allocation of land to the west of the Bridgewater Canal for SIC employment purposes as set out in Figure 12, this land has been included for employment purposes in the masterplanning work undertaken through work on the Daresbury Framework dating back to 2008. It has also been indicated in previous versions of the Core Strategy that this land would now be allocated for employment purposes.</p> <p>Turning to the area proposed for housing to the south of Delph Lane, as the potential</p>	No change to Figure 12 in respect of the current UDP housing allocation site 8045 being proposed for employment use. Figure 12 to be amended to include further land to be allocated for housing to the south of Delph Lane to achieve the proposed level of housing across the Central Housing Area.

No.	Comment Received	HBC Comment	Change Required
	south of Delph Lane to facilitate the delivery of housing numbers in line with the policy.	developers do not believe it will be possible to deliver 600 homes in the Central Housing Area as proposed, it is felt that extending the housing area would help to achieve this and therefore contribute to meeting the housing requirement for the Borough.	
4	Disagreement with the proposed transport interchange at the intersection of the two railway lines in the site. The practicality and feasibility of the station in this location is not proven. A bus only interchange may be more feasible.	<p>Comment noted regarding the uncertainty of the railway station in this location. A Governance for Railway Investment Projects (GRIP) study is underway and is currently at Stage 3 (Option selection) to investigate the potential for a railway station at this location. It is hoped that the outcome of the GRIP study will soon be known.</p> <p>It is acknowledged that it will take a number of years to secure a station at this location, but it would be premature to allocate the land for another purpose. It is therefore the Council's intention to continue to safeguard this land so that the opportunity to deliver a station in the future is not lost.</p>	No change required.
5	Include reference to contributions towards improvements to the Bridgewater Canal towpath due to increased usage. This could take the form of a warden or contributions towards the ongoing maintenance cost of the towpath.	Policy CS7: Infrastructure Provision includes a broad definition of infrastructure and para 10.2 is intended to include canals and towpaths. More specific guidance on the type and mechanism for securing planning obligations will be provided in a supplementary document and in specific relation to the East Runcorn area, through	Add reference to the Bridgewater Way Initiative in the Infrastructure section of the justification to the policy. Also ensure references are included within the Infrastructure Plan supporting document to the Bridgewater Way Initiative as the appropriate vehicle for securing

No.	Comment Received	HBC Comment	Change Required
	<p>Reference should also be made to the Bridgewater Way Initiative as an appropriate vehicle to enhance the canal corridor.</p> <p>Reference should be made to the fact that any works to the canal would need to be approved by the canal owner.</p>	<p>the Daresbury SPD.</p> <p>It is agreed that the policy would be improved by including reference to the Bridgewater Way Initiative.</p> <p>However, the need to consult the canal owner for any works that might affect the integrity of the canal or linkages to the towpath are too detailed to be included in the Core Strategy and should be set out within the Site Allocations and Development Management DPD.</p>	<p>enhancements to the canal corridor.</p>
6	<p>Include reference to the appropriate scale of the marina proposed within the Central Housing Area. In order to be commercially sustainable, the marina should be the same size as the facility at Preston Brook (250 berths). Reference should also be made to appropriate complementary uses which could include a public house, Chandlery and appropriate leisure facilities.</p>	<p>Whilst the Council support the inclusion of a small marina facility for the short term mooring of inland waterways craft, it is felt that a 250 berth marina would be excessive at this location and would not serve the purpose of creating a focal point at the heart of the area's mixed use centre. Whilst it is noted that it is felt that a smaller marina facility may not be commercially sustainable, no information has been provided as to the need for an increase in berths of this scale in this area, nor that a smaller facility would not be viable.</p> <p>The marina is proposed to be in close proximity to the mixed use local centre and this would be the preferred location for any associated facilities including retail and leisure.</p>	<p>No change to the Core Strategy. Further detail on the scale of the marina and associate facilities would be provided in the Daresbury SPD.</p>

No.	Comment Received	HBC Comment	Change Required
		<p>In terms of the appropriate scale of the Marina, it is intended that this level of detail would be contained within the Daresbury SPD.</p>	
7	<p>Request for an area figure for the amount of greenspace to be delivered to be included within the policy in the same way as area figures have been quoted for proposed development.</p>	<p>It is not felt that the addition of a figure quantifying the amount of greenspace to be delivered is a necessary addition to the policy. This level of detail will be included within the Daresbury SPD.</p>	<p>No change required.</p>
8	<p>Results of the East Runcorn Sustainable Transport Study (ERSTS), particularly in relation to the operation of the Strategic Road Network and the expected traffic increase need to be included within the Infrastructure section of the policy.</p> <p>Additionally, wording should be added to para 14.11 to deal with the potential impact of developments outside of this study area that have not been considered by the ERSTS. This refers to the need to continue to work in partnership with the Highways Agency during the development of the Site Allocations DPD.</p>	<p>It is agreed that the addition of further detail from the East Runcorn Transport Study would improve the policy.</p> <p>The Highways Agency has requested that similar wording regarding assessing the potential impact of future development on the Strategic Road Network be added to a number of policies within the plan, and it is not felt that it is necessary to include the same wording at several points through the plan. This approach has been discussed informally with the Highways Agency and they are content that the suggested wording only be included at one point in the document.</p>	<p>Add a summary of the findings from the ERSTS to the Infrastructure section of the policy justification.</p> <p>No change in respect of continuing to work with the Highways Agency to policy CS11. This wording will be added to policy CS7: Infrastructure Provision.</p>
9	<p>Questions raised over the delivery of the Strategic Site, given the large amount of infrastructure required and the associated high costs. It is also felt</p>	<p>Whilst it is acknowledged that the infrastructure costs are high, masterplanning work on this site has now been ongoing for a number of years and</p>	<p>No change required.</p>

No.	Comment Received	HBC Comment	Change Required
	<p>that the policy falls short in terms of setting out essential infrastructure requirements. There is a need for commitment in the Core Strategy, stating that the developers are aware of their infrastructure obligations. All of these elements combined means there is a high probability that the plan could fail.</p>	<p>those involved are aware of the necessary infrastructure requirements needed to unlock certain sites within the area. CS11 does include requirements for essential facilities including shops and community facilities within the mixed use neighbourhood centre. Evidence that major parties are committed to the delivery of development at Daresbury can be evidenced by their support for the Core Strategy policy which contains the infrastructure requirements they will need to contribute towards.</p> <p>The purpose of including the infrastructure requirements within the policy is so that they form part of the policy framework to guide future expansion at Daresbury. Once adopted, the Core Strategy and the policies therein will be the framework against which planning applications are judged. This is the purpose of a plan led system to avoid the failure of the site at the planning application/implementation stages.</p> <p>The development of the Daresbury area is expected to extend over a number of decades and as such the Core Strategy policy will be supported by a Daresbury Supplementary Planning Document plus ongoing engagement with stakeholders</p>	

No.	Comment Received	HBC Comment	Change Required
		and the public.	
10	<p>The proposed level of housing at East Runcorn is out of proportion with the rest of the Borough. This is a particular issue because the area is so poorly served by infrastructure at present.</p> <p>There are brownfield sites in Widnes which have not been included in the Strategic Housing Land Availability Assessment (SHLAA).</p> <p>The villages surrounding the East Runcorn Key Area of Change will be overwhelmed by and be significantly affected by the proposed development.</p> <p>Stronger phasing is needed in the East Runcorn Key Area of Change as Sandymoor should be developed out first, before favoured sites at Daresbury such as that at Delph Lane West.</p>	<p>Whilst the comments regarding the large amounts of development in the East Runcorn area are acknowledged, the policy is clear on the required level of infrastructure needed to support the development.</p> <p>A comprehensive assessment of potential housing sites was undertaken at the start of the SHLAA process and additional sites are considered each year. Without the details and locations of the substantial sites in Widnes which the respondent refers to, we cannot comment on whether they should have been included in the SHLAA. The respondent will be contacted to ascertain which sites they are referring to and whether the sites have already been considered for housing development but excluded for some reason.</p> <p>With regard to the impact of the development on the existing villages, it is not felt that they will be unduly affected. With the provision of necessary infrastructure it is felt that the new development area will be self sufficient.</p> <p>Whilst there may be benefits to completing the development at Sandymoor before bringing forward sites at Daresbury, given</p>	No change required.

No.	Comment Received	HBC Comment	Change Required
		<p>that the development is being brought forward by the Homes and Communities Agency there are constraints on their ability to bring forward sites unlike the manner in which private house builders operate. The site at Delph Lane West between the two railway lines is allocated for housing in the Halton UDP and therefore is able to be developed at this time without the need for the allocation in the Core Strategy.</p>	
11	<p>The Core Strategy needs to identify the expected social demographic of the occupants of the 2,864 new homes and then justify why it feels that new schools are not required in the East Runcorn Key Area of Change. The Core Strategy needs to be realistic and outline where the substantial number of children from these new homes will be educated as part of its assessment of the CS11 'infrastructure' requirements.</p>	<p>Consultation has been undertaken with Halton's Provision of School Places team regarding the need for new schools or expansion of existing facilities in light of the planned development proposed in the Core Strategy. According to their forecasting, there is no need for additional school provision in the East Runcorn area. It should also be noted that although 8000 new homes are planned to be built over the plan period across the Borough, it is estimated that the population is projected to increase by 4,900 persons for the same period. New homes do not translate into an increase in population as the occupants of the new homes may already be residents in the Borough. Nonetheless, it is acknowledged that further detail could be provided within the Infrastructure Plan as to how the need for new school places is calculated and the current situation in Halton.</p>	<p>No change to the Core Strategy. Addition of detail to the Infrastructure Plan regarding how the need for school places is calculated, with specific reference to the East Runcorn area.</p>

No.	Comment Received	HBC Comment	Change Required
		<p>In addition to this, there is a reserved site for a school in the Sandymoor area which has been secured through a Section 106 agreement. This allows the Council to exercise the right to use the site to build a school when the need arises for an additional school in the area. At present, there is no such need and hence the site remains undeveloped.</p>	
12	<p>Community facilities/shops at Daresbury should be included as part of the required infrastructure to support the site.</p>	<p>Shops and community facilities are included within the policy through the requirement for a mixed use neighbourhood centre at the heart of the residential area in the development area. It is likely that the developer of the Central Housing Area will provide the retail units. It is agreed that further clarity could be provided on this matter in the Infrastructure section of the justification and additionally in the Infrastructure Plan.</p> <p>It is anticipated that further detail on the precise nature of the neighbourhood centre in terms of mix and scale of units will be provided in the Daresbury SPD.</p>	<p>Further detail to be added to the Infrastructure section of the policy (paragraphs 14.11-14.13) detailing that the developer of the Central Housing Area will be required to provide the retail and leisure units that form the centre. Also add further detail to the Infrastructure Plan regarding how the delivery of the mixed use neighbourhood centre will be secured.</p>
13	<p>Give consideration to the need for an additional junction on the M56 in the form of Junction 11A at the southern end of the East Runcorn Key Area of Change. The creation of a new junction would take some traffic load</p>	<p>Whilst the Council supports the principle of an additional junction on the M56 and it is recognised that its creation could alleviate some of the congestion and transport issues in the wider area, the Highways Agency have no plans at present to build a</p>	<p>No change to the Core Strategy required. Refer to the long term potential for Junction 11A in the Infrastructure Plan document which supports the Core Strategy.</p>

No.	Comment Received	HBC Comment	Change Required
	off Junction 11 by diverting Heavy Goods Vehicles which use the junction to access Whitehouse Industrial Estate.	Junction 11A. Funding and delivery for a potential new junction have not been secured. Only infrastructure that is deliverable should be included within the Core Strategy.	

Policy CS12: Housing Mix

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
4	0	2	1	2	2

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	The Lifetime Homes standard should be a requirement not an option for housing developers.	Comment noted. It is felt that to require all homes to meet the Lifetime Homes standard would be too onerous, particularly as the standards relate to internal specifications which are outside of the control of the Development Management process. The encouragement in the Core Strategy policy will be supplemented by the inclusion of further detail on this matter in the Site Allocations and Development Management DPD and the Design of New Residential Development SPD. In addition to this, it should be noted that Lifetime Homes are a mandatory requirement of achieving Level 6 of the Code for Sustainable Homes which is proposed to be a requirement for all residential	No change required.

No.	Comment Received	HBC Comment	Change Required
		development in Halton from 2016 (as per policy CS19: Sustainable Development and Climate Change).	
2	The policy does not identify the specialist need for wheelchair adapted housing in the Borough.	Whilst it is noted that there is a need for adaptable housing and wheelchair accessible housing in the Borough, it is not felt that the Core Strategy is the appropriate place to refer to this requirement. The Council is in the process of finalising a Design of New Residential Development SPD which will include a section on Adaptable and Accessible Design. Further detail will also be provided in the Site Allocations and Development Management DPD. The SPD will supplement policy CS18: High Quality Design.	No change required.

Policy CS13: Affordable Housing

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
6	0	2	2	2	2

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Questioned whether the policy will be easy to understand and implement, given the technical challenges associated with calculating a percentage of an overall scheme's residential floorspace.	The scheme proportion of affordable housing provision will be based on total residential floorspace to ensure a more precise calculation of affordable housing provision. This will also ensure that where schemes include larger market residential units the appropriate amount of affordable housing provision is delivered. Calculating 35% of the total residential floorspace is not seen to present a technical challenge for housing developers.	No change required.
2	The policy should make explicit reference to meeting affordable housing needs in the rural areas.	The affordable housing policy will be applied across the Borough including rural areas. Reference is made in paragraph 9.7 (CS6: Green Belt) to small scale development, including affordable housing, being necessary in certain instances in rural communities to meet a	Include additional paragraph referring to meeting the affordable housing needs of rural communities in the justification to CS13 after paragraph 16.9.

No.	Comment Received	HBC Comment	Change Required
		specific local need. It is acknowledged that further reference to meeting affordable housing needs in rural communities could be included in the justification to CS13.	
3	The SHMA had not been reported to the Council by the time the Publication Core Strategy had been approved and it is still not in the public arena during the public consultation period on the Core Strategy. As a result the policy and its targets cannot be said to be justified in terms of its evidence base.	The SHMA was available to the Council in draft format prior to consultation of the Proposed Submission Document and hence has been used to influence the Affordable Housing policy. The document was due to be finalised and available during the consultation period; however, due to unforeseen circumstances this failed to be the case.	The Core Strategy Proposed Submission document is to be re-published for a 6 week consultation period to allow comments to be made in relation to the SHMA.
4	If the Council wishes to deliver a single affordable housing percentage across the whole Borough, this should be set at a target of 25% with a maximum of 50% Social Rented in accordance with the Mid Market Scenario from the Economic Viability Assessment. The outcome of affordable housing provision being sought as up to 35% of the total residential floorspace, based upon the Council's own evidence-based report, is that most housing schemes in the Borough would be unviable and would not proceed.	<p>The SHMA and the Economic Viability Assessment have both recommended policy targets for the delivery of affordable housing across the Borough. Both of these studies have therefore been used to inform the Affordable Housing policy and to set a realistic requirement that can be delivered over the Core Strategy plan period.</p> <p>The policy and justification refers to circumstances where the provision of affordable housing in line with the desired level may not be viable, and how such occurrences would be dealt with by the Council.</p>	No change required.
5	The policy puts the onus entirely on the developer to prove his or her case	Proving the viability of a scheme for a developer is not seen to result in the	No change required

No.	Comment Received	HBC Comment	Change Required
	with regard to scheme viability and would result in incursion of very substantial costs in the production of evidence for almost all larger housing schemes seeking permission in the Borough. Such an outcome would be disproportionate and unnecessary.	incursion of very substantial costs. The balance between costs and revenue would be central to any development scheme, which any developer would have a clear understanding of to ensure a scheme is profitable.	

Policy CS14: Meeting the Needs of Gypsies, Travellers and Travelling Showpeople

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
2	0	1	0	1	0

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	The criteria set out within the policy may exclude all potential sites and put the provision of such sites at odds with developable land within the Borough. The consideration of only uncontaminated sites is particularly restrictive; such sites can be successfully remediated.	The policy criteria have been developed to ensure that potential sites identified are appropriate and suitable to the needs of Gypsies, Travellers and Travelling Showpeople. With regard to the consideration of only uncontaminated sites being restrictive, the policy states that future provision would have to prove that this would not result in unacceptable living conditions. This would include successfully remediated sites.	No change required.
2	To ensure compliance with the Habitats Directive additional text should be included to ensure that sites which may lead to adverse effects on the integrity of the SPA/Ramsar site are not taken forward.	In order to be in compliance with the Habitats Regulations, it is agreed that Policy CS14 should be amended to ensure that sites which may lead to adverse effects on the integrity of the SPA/ Ramsar site are not taken forward.	Add additional bullet to ensure development would not lead to adverse effects on the integrity of the Mersey Estuary SPA and/or Ramsar site.

		It is noted that this comment replicates one of the recommendations made in the Habitats Regulations Assessment of the Proposed Submission Core Strategy.	
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Policy CS15: Sustainable Transport

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
3	0	1	1	1	1

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	The policy needs to take a holistic approach to development in the Borough. The policy should make exceptions for employment sites and waste facility sites which do not meet the criteria of the policy but which are necessary to meet the Borough's other objectives.	Although the general sentiments of the comment are agreed with, it is for individual development proposals to take a holistic approach and balance positive and negative factors which may present themselves to come to the most appropriate conclusion. Such an approach would be determined through the Development Management process.	No change required.

Policy CS16: The Mersey Gateway Project

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
4	0	1	0	0	1

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Policy wrongly assumes that the negative impacts come first. PPS9: Biodiversity and Geological Conservation promotes a hierarchical approach that seeks to firstly avoid harm, then to mitigate, then to compensate.	<p>It is agreed that the policy should be strengthened to ensure that it does not contravene government advice in PPS9 and the Habitats Directive.</p> <p>It is noted that this comment replicates one of the recommendations made in the Habitats Regulations Assessment of the Proposed Submission Core Strategy.</p>	Amend policy section d), Environmental Impacts, to include reference to measures needing to be sufficiently extensive for internationally important sites to enable a conclusion of no adverse effect on integrity, unless it can be demonstrated that there are both no alternatives and Imperative Reasons of Over-riding Public Interest.

Policy CS17: Liverpool John Lennon Airport

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
14	0	7	6	2	4

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Eastern Access Transport Corridor (EATC) is considered an eyesore which would lack funding to appropriately conceal it. It is also considered to be contrary to national Green Belt policy.	The Core Strategy supports in principle the future development of the EATC subject to appropriately addressing environmental and social impacts. The LJLA Masterplan (2007) states that the EATC would be integrated into the wider landscape and any features lost would be replaced by new landscape components. Any impacts of the junction works with Speke Boulevard on the ancient woodland, Mill Wood, would be appropriately mitigated. The landscape treatment and appropriate mitigation associated with the EATC would be determined through the Development Management process and would be subject to environmental assessments.	No change required. Development of a Liverpool John Lennon Airport Topic Paper to supplement the policy.
2	As a result of this policy the Public Safety Risk and noise levels would be	Matters relating to the Public Safety Zone, noise levels and air pollution would be	No change required.

No.	Comment Received	HBC Comment	Change Required
	significantly increased. The increased number of flights (however improved the aircraft) would mean significantly greater air pollution over Hale Village and beyond.	dealt with in accordance with national and local policy. However, it is acknowledged that further details and consideration of these impacts should be given through the Core Strategy. It is therefore proposed that a Topic Paper will be developed to support policy CS17: Liverpool John Lennon Airport and to provide further information of the future development and expansion impacts for residents of Hale Village.	Development of a Liverpool John Lennon Airport Topic Paper to supplement the policy.
3	The policy fails to adopt an integrated approach to sustainable development, in particular it is written on the basis that a runway and access road should be accommodated whatever the extent of their environmental impacts.	Although the policy is intended to adopt an integrated approach to sustainable development and states that future development and expansion of LJLA should demonstrate that it is in accordance with Halton's Sustainable Development Principles, it is agreed that this should be given more emphasis.	Move text to be included in the section entitled environmental and social impacts to the beginning of the policy and give more emphasis to future development and expansion of LJLA demonstrating that it is in accordance with Halton's Sustainable Development Principles.
4	The policy is unclear on what the noise and air pollution implications would be.	The LJLA Masterplan includes an in depth analysis of the implications of the future development and expansion of the airport would be. However, it is acknowledged that further details and consideration of these impacts should be given through the Core Strategy. It is therefore proposed that a Topic Paper will be developed to support policy CS17: Liverpool John Lennon Airport.	Development of a Liverpool John Lennon Airport Topic Paper to supplement the policy.
5	Considered that appropriate environmental assessments of the proposed infrastructure need to be undertaken prior to commitments	It is agreed that appropriate environmental assessments need to be undertaken for the future development and expansion of the airport.	Re-order and amend policy to give a greater emphasis to ensuring that measures to enhance positive, and mitigate and alleviate negative

No.	Comment Received	HBC Comment	Change Required
	being made to support them.		environmental and social impacts are demonstrated.
6	Reference to public safety risk, and particularly that of Hale residents, is given low priority through the policy.	The Council disagrees with the comment that low priority is given to Hale residents, the bullet points expressed in the policy are to be read as a whole with all being of equal importance in their own right. However, the Council has considered this and other relevant representations received and has re-drafted the policy to emphasise the importance of ensuring that negative social (and environmental) impacts associated with the potential future development and expansion of LJLA are appropriately addressed.	Re-order and amend policy to give a greater emphasis to ensuring that negative social and environmental impacts associated with the potential future development and expansion of LJLA are appropriately addressed.
7	If the predictions of passenger numbers (as expressed in the policy) are not realised for reasons out of the airport owner's control, the result would be that the Mersey Estuary shore being unnecessarily spoiled.	The Core Strategy policy sets out the policy framework should the special circumstances, including the commercial circumstances, for the Airports expansion be realised. Ultimately, whether the airport company decides to implement the runway extension will be a commercial matter and investment would not take place if it would not be required or result in an acceptable level of return.	No change required.
8	The Airport Company requests the inclusion of a policy within the LDF aimed at preventing development of off-airport car parks which would undermine the Airport Surface Access	Comment acknowledged. The consideration of a policy relating to off-airport car parks will be more appropriate for inclusion within the Site Allocations and Development Management DPD and / or	No change required.

No.	Comment Received	HBC Comment	Change Required
	Strategy.	the Transport and Accessibility SPD.	
9	There is no evidence to support the fact that the UK economy would benefit significantly from low cost holiday travel or evidence to show how the development of businesses in new and existing sectors throughout the UK would be stimulated by it.	The Future of Air Transport White Paper (referred to in the policy justification) acknowledges the importance of the future growth of air travel for national and regional economic prosperity and to deliver economic and social benefits throughout the UK. The Airport Operators Association report (referred to in the policy justification) have also recognised the significance of aviation's role in the UK economy and stimulating the development of businesses in new and existing sectors throughout the UK. The report states that aviation is an important sector, representing 1.5% of the UK economy. It earned the UK £18.4 billion in 2007 and provided employment for 234,000 people.	No change required.
10	Policy wording should be strengthened to make clear the high standards required to be achieved in order for mitigation to be deemed acceptable, 'reduce or alleviate' effects may not be sufficiently stringent to meet the requirements of the Habitats Directive.	To ensure that the adverse effects on Natura 2000 sites are avoided, it is agreed to strengthen the policy wording. It is noted that this comment replicates one of the recommendations made in the Habitats Regulations Assessment of the Proposed Submission Core Strategy.	Add additional paragraph to the policy with respect to internationally important habitats and ensuring measures needing to be sufficiently extensive to enable a conclusion of no adverse effect on integrity unless it can be demonstrated that there are both no alternatives and Imperative Reasons of Over-riding Public Interest.
11	It is considered that the risk to public safety in Hale village posed by the policy is too high.	Matters relating to the Public Safety Zone will be dealt with in accordance with national and local policy. However, it is acknowledged that further details and	Development of a Liverpool John Lennon Airport Topic Paper to supplement the policy.

No.	Comment Received	HBC Comment	Change Required
		<p>consideration of these impacts should be given through the Core Strategy. It is therefore proposed that a Topic Paper will be developed to support policy CS17: Liverpool John Lennon Airport and to provide further information of the future development and expansion impacts for residents of Hale Village.</p>	
12	<p>The policy is considered contrary to its Vision and Strategic Objectives with regard to the Green Belt enabling an important space between settlements and protecting the character of Hale Village.</p>	<p>Although the Vision states that the Borough's Green Belt continues to provide a vital resource for current and future residents and keeping important spaces between settlements, it also refers to protecting the character of Hale Village and ensuring that any negative impacts associated with the expansion at LJLA are minimised.</p>	<p>Development of a Liverpool John Lennon Airport Topic Paper to supplement the policy.</p>
13	<p>Area to the south of Bailey's Lane is seen to merit designation as an Area of Significant Landscape Value. This resource would be lost if the policy were adopted.</p>	<p>It is acknowledged through the LJLA Masterplan (2007) that the character of this area would be preserved through the proposed extension to the Coastal Reserve (Plan 5 of the Masterplan). Throughout the Coastal Reserve, a long term habitat creation and landscape management scheme would preserve habitat and biodiversity, and incorporate management measures to ensure the long term sustainability of the landscape and ecological mitigation works.</p> <p>It is acknowledged and agreed that further details and consideration of the landscape</p>	<p>Inclusion of reference to the landscape value of the land south of Bailey's Lane and the proposed Coastal Reserve extension in the policy justification.</p> <p>Development of a Liverpool John Lennon Airport Topic Paper to supplement the policy.</p>

No.	Comment Received	HBC Comment	Change Required
		value of this area should be given through the Core Strategy.	
14	While the Masterplan process has been endorsed by the DfT, and the DfT were sent a copy of the published version of the Master Plan, the document was never officially endorsed by the DfT.	Comment acknowledged.	Delete final sentence of paragraph 20.1.
15	The Liverpool John Lennon Airport diagram should be amended to show the spur road from the EATC to the Oglet ('World Cargo Centre') as shown in the LJLA Master Plan.	Figure 14: Liverpool John Lennon Airport Diagram supports the potential delivery of the Eastern Access Transport Corridor (EATC), however, the 'spur' road as referred to in the representation is not a strategic issue for the Core Strategy. This constitutes part of the Area of Search for Green Belt release and would therefore be considered through a Site Allocations DPD (or equivalent) and the Development Management process. It should be acknowledged that planning new transport links requires careful consideration in accordance with DfT Circular 01/2010: Control of Development in Airport Public Safety Zones.	No change required.

Policy CS18: High Quality Design

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
4	0	1	0	1	1

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Criteria for Lifetime Homes and Wheelchair Accessible Housing should be a requirement in the policy.	Agree with the importance of the Lifetime Homes standard and wheelchair accessible housing in meeting the current and future needs of the Borough. However, a requirement for residential development to achieve these standards would be more appropriate within the Site Allocations and Development Management DPD, with additional guidance set out through the Design of New Residential Development SPD. In addition to this, it should be noted that Lifetime Homes are a mandatory requirement of achieving Level 6 of the Code for Sustainable Homes which is proposed to be a requirement for all residential development in Halton from 2016 (as per policy CS19: Sustainable Development and Climate Change).	No change required.

2	Link should be made in this policy to the Halton Landscape Character Assessment.	It is agreed that a link should be made through the justification to the Landscape Character Assessment.	Add link to the Landscape Character Assessment to the justification.
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Policy CS19: Sustainable Development and Climate Change

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
4	0	0	0	0	0

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Recommend that the policy adopts assessment criteria to standalone renewable energy projects in order to be consistent with advice in PPS22: Renewable Energy and to enable proper consideration of impacts.	Whilst the Companion Guide to PPS22 sets out that it would be likely that there are two different policy areas in the plan to cover standalone renewable energy schemes and the integration of renewable energy into new development, it goes on to state that this would most probably be contained in an energy development policy document within the LDF. The role of the Core Strategy is therefore to provide an overarching policy which clarifies the importance of these two policy areas in addressing the objectives of the local planning authority. In order to be consistent with PPS22 and its Companion Guide, the Halton Core Strategy Proposed Submission Document, policy CS19: Sustainable Development and Climate Change, sets	No change required.

No.	Comment Received	HBC Comment	Change Required
		<p>out the strategic principles which will be used to guide future development across the Borough including for standalone renewable energy schemes. Detailed criteria-based policy relating to standalone renewable energy schemes and the integration of renewable energy into new development will be set out within the Site Allocations and Development Management DPD, and supported by a Sustainable Development and Climate Change SPD.</p>	
2	<p>The Core Strategy should also recognise that the Mersey Tidal Power project would have economic benefits for Halton, the rest of Merseyside, West Cheshire and the Northwest Region as a whole.</p>	<p>The economic benefits of the Mersey Tidal Power Project are considered to be a detailed matter that would not be necessary for inclusion within CS19: Sustainable Development and Climate Change. It is also acknowledged that further evidence based work is still ongoing to detail and quantify the economic benefits for the Liverpool City Region of the Mersey Tidal Power project. As the representation acknowledges, Halton Borough Council has expressed its support for sub-regional developments which contribute to the production of renewable energy, including the Power from the Mersey project subject to the management and mitigation of any identified environmental impacts.</p>	No change required.
3	<p>Additional consideration should be given to the economic viability of</p>	<p>The subject of economic viability is considered to be appropriately addressed</p>	No change required.

No.	Comment Received	HBC Comment	Change Required
	sustainable design, alongside the other pressures on new development, for example affordable housing and/or infrastructure charges.	<p>in the policy justification. It is for the developer to prove if a development scheme is unviable when considered alongside other requirements. Further consideration of the economic viability of developments will be included in the Developer Contributions DPD (or equivalent).</p> <p>The requirement for Code for Sustainable Homes Levels 3 and 4 was incorporated in to the Halton Economic Viability Assessment as a requirement for new homes in the Borough.</p>	
4	Reference should be made in the policy to the Local Brownfield Strategy.	It is agreed that reference should be made to the Local Brownfield Strategy and its findings, however, this would be more appropriate within CS23: Managing Pollution and Risk.	Inclusion of reference to the Local Brownfield Strategy within CS23: Managing Pollution and Risk.

Policy CS20: Natural and Historic Environment

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
4	0	1	1	1	1

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	The policy should identify that a balance needs to be achieved between the conservation of the Borough's natural and historic assets and the Borough's other strategic objectives.	The representation received relates more to issues that may occur on a specific site and not a general principle. This would therefore be dealt with through the Development Management process.	No change required.
2	The policy should conserve and enhance the strength of landscape character unless doing so conflicts with other key objectives of the Core Strategy.	The strength of landscape character and condition as informed through the Landscape Character Assessment will be conserved and enhanced in accordance with the approach set out in CS20: Natural and Historic Environment. Site specific issues should be determined through the Development Management process, in accordance with the Halton Core Strategy (once adopted) and the wider LDF.	No change required.

Policy CS21: Green Infrastructure

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
4	0	1	1	1	1

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Suggested that the Council recognises the potential of Widnes Golf Course for residential development. The site is seen to be developable and sustainable provided that the loss of green infrastructure is mitigated. However, it is recognised that the Core Strategy may not be the appropriate place for the final decision on the future of the existing Golf Course. The decision should be taken as part of the Site Allocations DPD.	As the representation has concluded the Core Strategy is not the appropriate vehicle to determine the likely future of the Golf Course. The development potential of the Golf Course to meet future housing needs would only be considered and determined through evidence base documents including the Strategic Housing Land Availability Assessment (SHLAA), the potential future Green Belt review and a review of greenspace in the Borough. These evidence base documents would then inform a Site Allocations DPD or equivalent.	No change required.
2	The policy should include a target hectareage total for delivery of provision for green infrastructure in replacement of the standards for	The justification for CS21 acknowledges that the standards for Provision for greenspace/ green infrastructure shown in Table 10 were developed through Halton's	No change required.

No.	Comment Received	HBC Comment	Change Required
	provision for greenspace/ green infrastructure.	Open Space Study which did not take account of the changing approach from open space to the wider green infrastructure network. As such the standards will be updated through the forthcoming Green Infrastructure Strategy for Halton. This Strategy would be the most appropriate place for the development of a target hectarage total for the delivery of provision for greenspace/ green infrastructure.	
3	The provision of green infrastructure is fundamental to changing the perceptions of the Borough as a whole, especially in key areas located within the existing urban centres. However, funding for such infrastructure is considered to be potentially problematic. Exchanging Greenfield for Brownfield land may be one way to achieve this. The Core Strategy should include reference to the exchange concept (HCA study).	Comment acknowledged. It is considered that reference to the Greenfield/ Brownfield exchange concept would be appropriate for inclusion in the Infrastructure Plan.	Inclusion of the Greenfield/ Brownfield exchange concept in the Infrastructure Plan.

Policy CS22: Health and Well-Being

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
1	0	0	0	0	0

Summary of Key Issues:

- No issues of note.

Policy CS23: Managing Pollution and Risk

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
4	2	1	1	1	1

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Soft-end or green uses for contaminated sites should be a last resort as contaminated land will not be remediated otherwise	It is recognised that some sites may be too contaminated to provide usable and safe soft end uses. Soft-end / green uses are already referred to in the policy only where it is not possible to achieve the full remediation of a site and therefore it would be a last resort.	No change required.
2	The policy is not consistent with Planning Policy Statement 23: Planning and Pollution Control, which states: "A failure to allocate commercially viable end uses to contaminated sites will result in the sites not being remediated."	Allocation of sites is a matter for the Site Allocations DPD, not the Core Strategy. It is acknowledged that not allocating contaminated sites for alternative uses may result in them not being remediated, however the sites being allocated for new uses must also be deliverable. Contamination issues may limit a site's ability to be allocated for an alternative use within another Development Plan Document.	No change required.

No.	Comment Received	HBC Comment	Change Required
3	The Core Strategy should include a separate policy on contaminated land as it did at the Preferred Options stage.	It is not felt that a separate policy on the issue of contaminated land is needed within the Core Strategy. Whilst it is acknowledged that a separate policy on the issue was included within the Preferred Options Core Strategy, in hindsight it was felt that much of this policy repeated national guidance and was not needed within Halton's Core Strategy. The priority of the policy as drafted is to remediate sites. It should be acknowledged that further consideration of the remediation of contaminated land will be addressed through the wider LDF and in particular the Site Allocations and Development Management DPD.	No change required.

Policy CS24: Waste

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
3	0	1	1	1	1

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	In addition to the specific provisions in this policy, reference should be made to encouraging the use of waste to produce renewable energy.	Comment acknowledged. The encouragement of waste to produce renewable energy is being dealt with through the Merseyside and Halton Joint Waste DPD.	No change required.
2	Considered that the policy should balance the needs of development against the strategic benefits of providing waste facilities.	Balancing the impacts of development against the strategic benefits of providing waste facilities should be determined through the Development Management process and in accordance with the Joint Merseyside and Halton Waste DPD (Joint Waste DPD) and the Halton Core Strategy. In any event, waste management facilities are required to minimise the impacts on the environment and the communities of the Borough.	No change required.
3	Object to inclusion of safeguarding waste facilities, this should be	The inclusion of the word 'safeguard' in point one of the policy is aligned with the	No change required.

No.	Comment Received	HBC Comment	Change Required
	removed from the policy. The decision on whether waste sites should be safeguarded from other development uses is being considered through the Joint Waste DPD, the Core Strategy should not include a policy which pre-determines the policy approach of this DPD. In any event, object to the safeguarding of sites, as this approach is inflexible, and where there are changes in the wider economic and policy conditions this can result in sites becoming undevelopable.	Joint Waste DPD and will maintain flexibility through ensuring that this is delivered 'where appropriate' which would, if justified, include the implications of wider economic and policy conditions.	
4	Recommended that the policy states that recycling facilities that feature methods of treatment higher up the waste hierarchy should be supported over less sustainable methods and facilities such as landfill and incineration.	The Council through promoting sustainable waste management supports methods which are higher up the waste hierarchy. This is determined through the Joint Waste DPD.	No change required.

Policy CS25: Minerals

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
1	0	0	0	0	0

Summary of Key Issues:

- No issues of note.

Supporting Document A - Infrastructure Plan

Summary of Representations Received:

Number of individual comments received on policy	Not Legally Compliant	Unsound	Unsound because it is not...		
			Justified	Effective	Consistent with National Policy
2	0	0	0	0	0

Summary of Key Issues:

No.	Comment Received	HBC Comment	Change Required
1	Wording should be added to para. 4.6 (Highway Network) regarding the need for further consideration of the impacts of new development on the existing and proposed networks and the requirements for further infrastructure to support new development, during the production of the Site Allocations DPD. This is with particular regard to the M56 and the M62.	Comment noted.	Wording to be added as suggested to the Infrastructure Plan.