

APPENDIX A

STATEMENT OF REPRESENTATIONS

Received at Proposed Submission Draft consultation (ending 19th September 2019)

This 'Statement of Representations' sets out the number of comments, objections, and supportive representations received on each local plan policy (or supporting document) together with a summary of the main points raised during the last consultation between August-September 2019.

	Comment	Object	Support	Summary of key issues
DALP Introductory sections	2	6	2	<p>The Vision had not been adapted from that set out within the adopted Core Strategy. The Vision as drafted fails to recognise that (a) the emerging Plan period will extend 9 years beyond that of the adopted Core Strategy, and (b) that the level of growth now planned for (and its distribution) is different.</p> <p>The vision for Halton should include reference to the historic environment.</p> <p>Please remove hyphen from Trans Pennine Trail</p> <p>Concerns over the deletion of policy CS2</p>
Policy: CSR1 Spatial Strategy	2	24	6	<p>Spatial Strategy is not aspirational.</p> <p>The Spatial Strategy should use the existing evidence base and increase the number of dwellings and employment over the plan period.</p> <p>Development located in the Key Urban Regeneration Areas of Hale and Ditton Corridor and North Widnes and East Runcorn have the potential to give rise to traffic impacts at the SRN due to the close proximity of these locations.</p> <p>Support for the Key Areas of Regeneration</p> <p>Agreement that not all future development can be delivered on Brownfield Land.</p>
Policy: CS2 Presumption in Favour of Sustainable Development	1	0	0	No comments.
Policy: CSR3 Housing Supply	1	65	9	<p>Aim for development on Brownfield land at 60%</p> <p>350 dpa is higher than the standard housing methodology needs to be lowered to 285.</p> <p>Housing figure of 350 dpa too low needs to be derived from the housing needs assessment and either 466 or the higher 565 figure.</p>

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				Clear confirmation required that you are intending to meet all housing needs arising in Halton over the plan period and how it's derived.
<u>Policy: CSR4</u> Employment Land Supply	1	8	6	The employment figure of 180ha needs to be justified. Amend policy wording for Natural England to take into account the potential impacts on designated sites. Employment figure should be increased. Welcomed reduction in employment land at Moore. Why aren't other areas within the LCR looked at for delivering more employment land?
<u>Policy: CSR5</u> Network of [Retail] Centres	1	1	1	Town centre allocations, i.e. residential allocations etc. are not shown on the inserts for the Town Centres.
<u>Policy: CSR6</u> Green Belt	1	62	9	Lack of exceptional circumstances for removal of Greenbelt. Need to retain the Greenbelt to stop urban sprawl. Removal of GB Temp Loss of Greenbelt around Moore. Impact of Peel's Port Warrington on the Greenbelt/Moore. Loss of Daresbury in the Greenbelt. Support for the exceptional circumstances justifying the release of Greenbelt. Removal of Greenbelt in the vicinity of LJLA. No justification for removal of Greenbelt in Runcorn.
<u>Policy: CSR7</u> Infrastructure Provision	4	5	2	The policy should recognise International and Nationally or local sites and wording should suggest providing infrastructure to enhance water quality, existing habitats and creation of new habitats. It is important that infrastructure is provided within the Borough to accommodate the impacts of development at both an individual and cumulative level. CIL and pooling of limited contributions. 'Flood defence infrastructure' to be inserted thereby highlighting the importance of this key infrastructure which protects lives. Current lack of social infrastructure, i.e. schools, health care etc. EATC Applicants should be required to prepare an infrastructure phasing and delivery strategy where sites are to be built out will be delivered by different developers or in separate phases.

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Policy: CS9 South Widnes KAoC	1	1	0	Wording in Policies CS9 and CS10 are amended so that the development principles seek to deliver environmental enhancement (and/or net gain) wherever possible and that development proposals will be subject to a HRA at the project level to ensure that impacts are assessed and that a conclusion of no adverse effect on site integrity for Mersey Estuary SPA/Ramsar.
Policy: CS10 West Runcorn KAoC	1	1	0	Amend so that the development principles seek to deliver environmental enhancement.
Policy: CS11 East Runcorn KAoC	1	0	0	No comments.
Policy: CSR12 Housing Mix	2	11	3	Mix of housing will need to have regard to site specific viability considerations. Requirements for Lifetime homes can impact on viability. References to families with access needs. Policy needs to reference changing markets.
Policy: CSR13 Affordable and Starter Homes	1	17	0	Requesting clarity over which % of affordable housing is required for each of the rates. Uneven balance of affordable housing requirements. Clarity over the 10% affordable home ownership. Lack of evidence for affordable housing requirement.
Policy: CSR14 Gypsy & Traveller Accommodation	0	3	1	Weight to the historic environment needs to be noted.
Policy: CSR15 Sustainable Transport	2	4	0	Horse riding should be referenced in policy CSR15 Travel Plans
Policy: CS16 Mersey Gateway Project	1	1	0	Wording in this policy should be amended to ensure 'no net loss in supporting habitat for the Mersey Estuary SPA and Ramsar'.
Policy: CSR17 Liverpool John Lennon Airport	1	57	0	Removal of Greenbelt / Loss of agricultural land Dungeon Lane Closing and Reopening of Baileys Lane TRO Loss of wildlife Air Quality/ Noise Lack of information on EATC proposals submitted by Liverpool City Council, Peel and LILA

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Policy: CSR18 High Quality Design	1	2	3	Design policy is too aspirational. Design of new development should face watercourses.
Policy: CSR19 Sustainable Development and Climate Change	0	8	2	The only additional technical requirements exceeding the minimum standards required by Building Regulations that can be sought are the optional technical standards as detailed in the PPG. Strengthen BREEAM requirement from encourage to require.
Policy: CSR20 Natural and Historic Environment	0	8	1	Lack of Consideration for the Daresbury Conservation Area Wording changes in order to meet the requirements as set out in the PPG guidance with reference to non-designated heritage assets.
Policy: CSR21 Green Infrastructure	0	6	5	Support for Green Infrastructure Recreational Pressures Evidence base in relation to open space is out of date
Policy: CSR22 Health & Wellbeing	0	1	0	Natural and semi-natural spaces contribute to a healthy population and could be included for a health and well-being policy.
Policy: CS23 Pollution and Risk	1	0	0	No comments.
Policy: CS24 Waste	1	0	0	No comments.
Policy: CSR25 Minerals	1	0	0	No comments.
Policy: CSN26 Unallocated Land in Urban Areas	0	0	1	The policy allows for existing uses to continue and any redevelopment of such sites to be subject to other policies within the Development Plan
Policy: ED1 Employment Allocations	0	85	14	Employment Renewal Areas, which should be counted towards the total needed. Impacts on the Strategic Route Network. Employment allocations around Moore ecological network conflict.
Policy: ED2 Employment Development	1	5	0	It is not reasonable to require that extensions to existing properties are served by public transport and provide pedestrian and cycle links to adjacent residential areas. Omits any reference to protecting wildlife sites.
Policy: ED3 Complementary Services within Emp Areas	0	0	2	No comments.

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Policy: RD1 Residential Development Allocations	9	362	23	<p>Several allocations are cited as being former schools or colleges with associated playing field. As there is no up to date Playing Pitch Strategy in place there is currently no clear evidence that these sites are surplus to requirement for community sport.</p> <p>Objections to sites: D1, M8, R1, R17, R20, R22, R25, R26, R28, R30, R32, R33, R35, R36, R37, R38, R35, R67, R40, R41, R46, R49, R5, R50, R52, R60, R69, R7, R70, R71, R72, R73, R74, R77, R78, R79, R8, R80, R83, W10, W11, W17, W24, W28, W34, W4, W40, W43, W45, W47, W49, W5, W50, W9.</p> <p>Support for sites: H1, P1, P2, R29, R30, R31, R37, R38, R39, R67, R49, R50, R79, W11, W49</p>
Policy: RD2 Gypsy and Traveller Allocations	0	5	0	<p>GT1 - Our client objected to the application for the Travellers site on the adjacent land which has recently been developed, and forms part of the allocation.</p> <p>Concerns over some parts of the GT allocated falling within FZ2 or FZ3.</p>
Policy: RD3 Dwelling Alterations and Extensions	0	1	0	<p>For any dwelling alterations, extensions, conversions and replacement dwellings may be subject to the requirements to undertake a site specific Flood Risk Assessment during the planning process.</p>
Policy: RD4 Greenspace Provision	1	9	0	<p>Concerns over all residential developments of 10 or more dwellings which "increase the demand" for greenspace will be expected to make an appropriate contribution towards meeting this additional demand (on or off-site).</p> <p>Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court/pitch ranges from two people if a tennis court to 30 people if a full sized adult rugby pitch.</p> <p>It is not clear whether the delivery of this quantum of open space is compatible with the notional capacities identified on the allocated sites, or whether it has been fully factored in to the Council's viability assessment.</p>
Policy: RD5 Primarily Residential Areas	1	1	0	<p>Village settlement boundaries for areas such as Daresbury/ Moore and washed over with Greenbelt.</p>
Policy: RD6 Custom & Self Build Housing	1	13	0	<p>Evidence base that has been used to derive the requirements set out under this Policy the Policy seems to be based on the findings of the Mid-Mersey Strategic Housing Market Assessment (SHMA, 2016), and the Strategic Housing and Employment Land Market Assessment (SHELMA, 2017). Accordingly, there is nothing to suggest that this Policy has been prepared in line with guidance.</p>

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				A robust evidence base setting out the demand within Halton is required.
<u>Policy: C1</u> Transport Network & Accessibility	2	9	3	<p>Summary of key issues</p> <p>Insufficient documentation relating to a transport evidence base has been produced to unpin the Local Plan and the documentation does not contain an assessment of the baseline performance and likely traffic impacts of the proposed development site allocations at the Strategic Road Network. The Local Plan should set how a Major Road Network is likely to impact the Borough and their approach with regards to the management of a Major Road Network with Highways England and the wider Liverpool City Region. Reference should also be made to the Liverpool City Region Key Route Network. There is limited detail regarding the assessment of development proposals at an individual and cumulative level and required infrastructure to deliver growth in the Borough up to 2037.</p> <p>Reference should be made to the Liverpool City Region Key Route Network and the potential interaction with the proposed development site allocations within the Borough. The Local Plan should set how a Major Road Network is likely to impact the Borough and their approach with regards to the management of a Major Road Network with Highways England and the wider Liverpool City Region.</p> <p>Lack of reference to Waterways within the policy.</p> <p>Failure to support the EATC for freight and logistics.</p> <p>Support for the reopening of Ditton Station.</p>
<u>Policy: C2</u> Parking Standards	1	5	1	<p>Concerns over how a car club can be delivered, and the variance of +/- 10% car parking standards which will be assessed on a case by case basis, however this was seen as a concern by one developer yet supported fully by numerous developers.</p> <p>Cycle storage provision is too descriptive.</p> <p>Inclusion of electric car charging points and disable parking standards is welcomed. However, it was raised that there is lack of clarity in how this will be achieved i.e., how many car charging points will be required and it be built into the viability study.</p>
<u>Policy: C3</u> Telecommunications Infrastructure	1	1	0	There is no evidence to require the developer to provide the necessary infrastructure as part of new development.
<u>Policy: C4</u>	1	1	0	LJLAL are concerned that the draft Policy does not present the most appropriate strategy and would ultimately be ineffective LJLAL welcomes the Policy's reference to the Runway End Safety Area (RESA) It is requested that Part 3 of the Policy be improved so that all airport

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Operation of Liverpool John Lennon Airport				<p>safety issues are supported by the Council, rather than 'where appropriate', as is currently drafted.</p> <p>Airport parking the Policy would be more effective if the word 'generally' was removed.</p> <p>10.35 to be altered to list the types of development which could potentially effect aviation such as but are not limited to Wind Turbines, Solar PV, Lighting and Crane Operations. Mobile phone mast extensions which fall under General Permitted Development are notified to Liverpool Airport as per Appendix A of 'Code of Best Practice on Mobile Network Development in England.'</p>
<u>Policy: HC1</u> Vital and Viable Centres	1	0	0	No comments.
<u>Policy: HC2</u> Retail and TC Allocations	0	2	2	No robust assessment of the historic environment.
<u>Policy: HC3</u> Primarily Shopping Area	0	0	0	No comments.
<u>Policy: HC4</u> Shopfronts, Signage and Advertising	1	1	1	<p>Signage and Advertising are the same thing.</p> <p>Conflict with needs to be replaced with "planning applications affecting a heritage asset should not harm its significance.</p>
<u>Policy: HC5</u> Community Facilities and Infrastructure	3	3	1	<p>The inclusion of "or the use has already ceased" within part b is considered to be unnecessary and risks undermining the rest of the policy.</p> <p>Lack of schools.</p>
<u>Policy: HC7</u> Visitor Attractions	1	1	1	Add 'The Bridgewater Canal' to the list of visitor attractions at Appendix F of the DALP and identify on the Proposals Map
<u>Policy: HC8</u> Food and Drink	1	1	1	No comments.
<u>Policy: HC9</u> Mixed Use Areas	1	12	2	<p>Mixed use sites are vague on what they should deliver.</p> <p>Lacking robust assessment of the historic environment.</p> <p>Mersey Edge</p> <p>HSE Concerns over some allocations.</p>
<u>Policy: HC10</u> Education	2	3	1	<p>Homes England wish to have an amendment to the policy to state that alternative uses of the sites within the plan period will be acceptable.</p> <p>No mention of secondary school provision.</p>

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<u>Policy: HE1</u> Natural Environment & Nature Conservation	0	7	3	<p>The spatial data relating to Sites of Local Importance (LWS) is over 10 years out of date.</p> <p>No policy incentive to restore/enhance habitats to help the recovery of priority species or secure net gains for biodiversity.</p> <p>'Nature Improvement Area' (referred to in HE1) covers a significant amount of land within the Halton urban area, including land which is allocated for development.</p> <p>Natural Environment and Nature Conservation needs to reflect an on-going commitment to a Liverpool City Region approach to managing visitor pressure on internationally important sites across the City Region</p>
<u>Policy: HE2</u> Heritage Assets and Historic Environment	1	1	0	<p>The use of the word 'must' should be changed to 'should' throughout the policy</p>
<u>Policy: HE3</u> Waterways and Waterfronts	1	1	0	<p>The policy should go further by requiring appropriate contributions from developments in the vicinity that could put greater recreational pressure on the Canal.</p>
<u>Policy: HE4</u> Green Infrastructure	1	9	5	<p>Concerns over the robustness of the evidence base upon which the Council is relying to justify its policy position.</p> <p>Conflict with employment allocations.</p> <p>It is not clear how development is expected to "address climate change"</p> <p>The Policy as drafted appears to contradict Policy CS(R) 21 which seeks to resist the loss of green infrastructure where there is an identified deficiency in provision</p>
<u>Policy: HE5</u> Trees and Landscaping	1	2	0	<p>It is unclear how the Council considers conserving and where appropriate enhancing the character and quality of local landscape.</p>
<u>Policy: HE6</u> Greenspace & Sports Provision	1	4	6	<p>Surplus to requirement should be assessed against current supply/and demand for each pitch sport type and not by a purely quantitative standard</p> <p>The evidence base in relation to open space does not support the areas of Greenspace shown on the proposals map, and in any event is significantly out-of-date.</p> <p>HE6 does not leave sufficient scope, or give sufficient weight to, the need for mixed-use development including housing in and around sites allocated for Green space and Outdoor Sports Provision so as to sustain such facilities and services</p>
<u>Policy: HE7</u>	0	1	1	<p>The policy needs to include wording on in-combination impacts on national and international designated sites.</p>

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Pollution and Nuisance				
<u>Policy: HE8</u> Land Contamination	0	1	1	No comments.
<u>Policy: HE9</u> Water Management and Flood Risk	0	3	0	<p>Concerns regarding Part 17 of the Policy which states that "new development will need to ensure there is adequate water supply, surface water, foul drainage and sewerage or waste water treatment capacity to serve the development neither the policy or explanatory text provides a definition as to what quantifies as an adequate water supply.</p> <p>FRAs should take account of wave and storm adjustments</p> <p>Developers will be required to produce drainage strategies for each phase of development in agreement with the Council, Lead Local Flood Authority, United Utilities and the Environment Agency. For any development proposal which is part of a wider development site, it will be necessary to ensure the foul and surface water drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction.</p> <p>Any development proposal should ensure unfettered rights to discharge between the various development parcels and demonstrate how the site delivers sustainable drainage as part of interconnecting phases. It will be necessary to ensure drainage infrastructure is delivered in a holistic and co-ordinated manner as part of an overall strategy between phases of development and between developers. Ground Water Protection Zones (GWPZs) United Utilities welcomes</p> <p>The policy does not make reference to the areas in Halton identified by the Environment Agency (EA) as Source Protection Zones (SPZs). It is felt that there is an opportunity to highlight the location of such SPZs within the Local Plan.</p>
<u>Policy: HE10</u> Minerals Safeguarding Areas	1	0	1	No comments.
<u>Policy: HE11</u> Minerals	1	1	1	Such proposals have the potential to affect the historic environment.
<u>Policy: GR1</u> Design and Development	1	4	0	<p>Flexibility required on a site by site basis.</p> <p>Need references to Active Design Guide (Sport England)</p>
<u>Policy: GR2</u> Amenity	2	3	1	UU request that reference to consulting them in inserted into the policy.

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				Concerns over – “preclude the development of adjoining land with longer-term potential”.
Policy: GR3 Boundary Fences and Walls	1	0	0	No comments.
Policy: GR4 Temporary Buildings	1	0	0	No comments.
Policy: GR5 Renewable and Low Carbon Energy	1	2	0	The retrofitting of renewable energy outlined in bullet 5 has the potential to impact on the significance of heritage assets. There must be a positive policy approach which makes is clear that planning applications will be considered favourably, particularly in the absence of site allocations.
Policy: GB1 Control of Development in the Green Belt	1	0	1	No comments.
Policy: GB2 Safeguarded Land	2	148	2	No justification for quantum of safeguarded land, or what purpose it is for. Loss of grade 1 agricultural land. Concerns over Daresbury Village and the impact of safeguarded land on the historic environment.
HIA Health Impact Assessment	0	6	0	The John Lennon Airport master will seriously impact residents due to a mass increase in air pollution and noise.
HRA Habitats Regulations Assessment	0	3	0	Further explanation is also required in order to demonstrate how the mitigation measure for recreational pressure through the Visitor Management Strategy will be addressed through the plan. The list of qualifying SPA features is incorrect in Appendix B, Redshank is now treated as a 'non-breeding feature' of the Mersey Estuary SPA despite previously being described as separate 'wintering and passage' features - please refer to the Mersey Estuary SPA Conservation Advice for the full list of features. Loss of Functionally Linked Land (FLL) It is unclear whether a thorough assessment of the allocations and policies has been undertaken and we recommend further engagement with Natural England on the HRA to ensure adequate assessment. We advise the wording in Policy CS7 should be strengthened to ensure appropriate measures are in place to mitigate potential impacts to

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				water quality at the plan level. We advise the inclusion of green infrastructure approaches such as the inclusion of SuDS and reference to other relevant policies i.e. Policy CS21 Green Infrastructure should be made. We strongly advise consultation with United Utilities is carried out as soon as possible to inform and strengthen the policy.
IDP Infrastructure Development Plan	1	1	0	There is limited detail regarding the assessment of development proposals and required infrastructure to deliver growth in the Borough up to 2037. The IP does not comprehensively provide detail of how all the infrastructure schemes would be funded, providing some uncertainty around deliverability. It is also stated that a further piece of work is required to divide up the contributions for external Highways and Transport improvements which have not been funded.
Policies Map	0	2	0	Overlaying of the previous legend from the Publication Version of the DALP in relation to CSR17.
SA Sustainability Appraisal	0	21	0	English Heritage disagree with the SA score (0) that the Policy will have no or negligible effect on the SA objective on Cultural Heritage and Landscape.
SCI Statement of Community Involvement	0	5	0	Issues raised over the closure of Baileys Lane.
SFRA Strategic Flood Risk Assessment	0	1	0	There appears to be a number of proposed allocations located within FZ2 and 3 not supported by a level 2 Strategic Flood Risk Assessment (SFRA).
SoCG Statement of Common Ground	1	0	0	Warrington and Halton to enter into an agreement on strategic issues.