

**APPENDIX 1**

**PROPOSED COMMENTS TO THE SECRETARY OF STATE'S RESPONSE TO THE DRAFT REGIONAL SPATIAL  
STRATEGY**

Proposed Change Reference no.	Policy/ Paragraph/ Diagram	Proposed HBC Response
R4.2	RDF1 (Spatial Priorities) and associated para 5.4	<p><b>Clarification required.</b> The policy contains six emboldened towns/ cities under the third priority for growth (Carlisle, Chester, Crewe, Lancaster, Preston and Warrington). Explanatory text at paragraph 5.4 explains that these towns have particular advantages and that unbridled growth is not proposed for these locations but that opportunities should be harnessed in sustainable ways.</p> <p>It is unclear whether these six towns are truly prioritised relative to others within the third priority for growth, effectively creating tiers 3a and 3b within the policy or whether the “priority” referred to by the Secretary of State in the reasons for changes merely means that the six towns need to be treated differently. As such, clarification is sought.</p>
R4.13	RDF4 (Green Belts) and associated para 5.26	<p><b>Clarification required.</b> The policy refers to “exceptional substantial strategic change” to Green Belt boundaries. No definition of this terminology is given, with the matter to be considered on a case by case basis. However, explanatory paragraph 5.26 refers to the different phrase “exceptional substantial change” which adds to confusion. Explanatory text to the policy should give a better explanation of how “exceptional substantial strategic change” would be assessed and, if necessary, how this differs to “exceptional substantial change”.</p>
R5.3 and R5.6	W3 (Supply of Employment Land) and Table 6.1 (Provision of Employment Land 2005-2021)	<p><b>Clarification required.</b> Whilst it may be interpreted that the employment land supply figures in Table 6.1 Provision of Employment Land 2005-2021 (hectares) represent ceilings for future provision this is not definitively stated in either the policy, table or explanatory text. Given changes made to regional housing</p>

		figures in that they are no longer to be regarded as ceilings and the clear link between housing and employment in order to achieve sustainable growth, clarification regarding whether the employment land figures represent a ceiling or not is therefore essential. An explanation of how “2005 Supply” in table 6.1 is defined and what it entails should be given.
R7.5	RT2 (Managing Travel Demand)	<b>Objection.</b> The second sentence of the policy should be changed to: ‘...including M6, M56, M60 and M62 and other strategic routes such as that provided by the Silver Jubilee Bridge’
Not referenced but changes made	RT6 (Ports and Waterways) Paragraph 8.24	<b>Objection.</b> The reference to the Manchester Ship Canal should include Weston Docks within Halton Borough. Accordingly, reference to the Port of Weston should be included in the final sentence of paragraph 8.24.
R5.11	Key Regional Spatial Diagram and Liverpool City Region Key Diagram in connection with Policy RT8 (Inter-Modal Freight Terminals)	<b>Objections.</b> 1) Key Regional Spatial Diagram. Albeit that it is acknowledged that this diagram is for illustrative schematic purposes it is of note that the rail freight location referred to in Policy RT8 (Inter-Modal Freight Terminals) as Widnes (with access to the West Coast Main Line (Liverpool Branch)) is shown on the diagram as adjoining Runcorn and not Widnes. This minor drafting error should be corrected.  2) Liverpool City Region Spatial Diagram. This diagram omits a rail freight location at Widnes (with access to the West Coast Main Line (Liverpool Branch)) in connection with Policy RT8 (Inter-Modal Freight Terminals). This drafting error should be corrected.
R7.11 and R12.1	RT10 (Priorities for Transport Management and Investment) and RSS Implementation Plan  LCR1 (Liverpool City Region	<b>Objection.</b> Table 10.2 which detailed Transport Investment Priorities and Schemes within the Regional Funding Allocation Programme, amongst others, has been deleted and is to be incorporated into an Implementation Plan in accordance with explanatory text at

	Priorities)	<p>paragraph 8.37 and Policy IM1 (Implementation). An up to date version of the Implementation Plan has not been made available with the Secretary of State's Proposed Changes. Notwithstanding the presence of paragraph 8.37, there is uncertainty regarding the detailed content of the Implementation Plan. This is unacceptable, as the Implementation Plan should have been published alongside the Secretary of State's Proposed Changes that recommended what would appear to be significant changes to an earlier draft of it. There are vitally important transport investment schemes that require a 'hook' from the development plan.</p> <p>Given that table 10.2 has been deleted, it is essential that the most important transport investment schemes for the sub-regions are referred to within the Sub Regional Strategies sections of RSS. It is of note with regards to the Liverpool City Region that paragraph 12.4 of the Panel Report states "We have omitted the site specific references to transport schemes which MPU propose (Mersey Gateway, light rapid transit); the Transport chapter of the draft RSS deals with lists of proposed schemes and priorities..." In our opinion, the Secretary of State's Proposed Changes means that this rationale for exclusion no longer applies.</p> <p>In Halton's case the Mersey Gateway (New Mersey Crossing) should be referred to within Policy LCR1. RSS should be read as a whole and, as such, this should be done in conjunction with a cross reference to Policy RT10. Reassurance is also required that major maintenance works to the Silver Jubilee Bridge and the reinstatement of Halton Curve would be included in the Implementation Plan.</p>
R5.10 and	W2 (Locations for Regionally Significant Economic Development)	<p><b>Objection.</b> Policy W2 has been amended to refer to Regionally significant economic development being located close to transport nodes within the urban areas of, amongst others, the Liverpool City</p>

R12.1	LCR1 (Liverpool City Region Priorities)	<p>Region. This varies the Panel's recommendation, which referred to "Merseyside (including Ellesmere Port and Halton)". Whilst this change is not objected to per se in Policy W2, it is considered that as emerging RSS is currently worded, insufficient locational direction is given regarding suitable locations for regionally significant economic development. This view is taken in full knowledge of W2 providing criteria against which locations for regionally significant economic development would need to accord.</p> <p>RSS should be read as a whole and, as such, reference to Halton as a suitable location for regionally significant economic development should be inserted into a bullet point of Policy LCR1 and cross referred to Policy W2. Policy LCR1 would then complement W2 in the appropriate manner.</p>
-------	---	--