



The countryside charity
Lancashire, Liverpool City Region
and Greater Manchester



The countryside charity
Cheshire

Steve Rotherham, Mayor
Liverpool City Region Combined Authority
No 1 Mann Island,
Liverpool,
L3 1BP

Acres Brook, Sabden Road
Higham, Lancashire, BB12 9BL

Telephone: 07718070750
jackie.copley@cprelancashire.org.uk
www.cprelancashire.org.uk

By Email:

Patron
Her Majesty the Queen
President
Emma Bridgewater
Chair
Debra McConnell

1st February 2021

Dear Steve Rotherham,

CPRE Comments: The Liverpool City Region Spatial Development Strategy, Our Places Consultation

Introduction

CPRE the countryside charity welcomes the opportunity to contribute to LCRCA's first draft SDS as set out at <https://lcrsds.commonplace.is/>.

We work with communities, businesses and government to ensure that all our countryside and green spaces can thrive.

CPRE wants the Liverpool City Region SDS to best protect and enhance important rural areas and urban greenspace. We want new jobs and homes to be planned on sustainable development principles, making the most of existing brownfield land in our towns and cities and relying on walking and cycling at the neighbourhood level. The Green Belt has a vital role to play in keeping our land permanently open. It stops unwanted urban sprawl; it stops the merging of distinct places; it stops countryside encroachment; it protects the setting of our historic towns; and it promotes urban regeneration. Land in the Green Belt should remain in the Green Belt.

Environmental capacity and value should be a priority in the future

CPRE says that the Combined Authority cannot simply push for unrestricted growth in places that lack the environmental capacity as this fuels greenhouse gas emissions and the climate emergency, causing flooding, as has been experienced in recent storm events, which have become more intense and frequent. Exceedance of air pollution limits with associated poor health from respiratory disease and loss of amenity should be a thing of the past. We must plan for people and wildlife not just for profit.

It is imperative that we nurture our natural capital, including a connected patchwork of trees, shrubs and hedgerows in which wildlife may thrive. We must contribute to ending the global ecologic crisis which is afflicting the UK and the rest of the world.

Maintain future food security

Future generations need the ability to grow their own food and be supported by policies that safeguard our fertile farm land. Our rural economy is important for our food and drink sector that has been harshly impacted during the Covid pandemic. People enjoy quality natural environments as well as the cultural attractions of towns and cities.

Health and well-being

Everyone has increasingly relied on local greenspace for health and well-being benefits during the pandemic. It is important that local people take up the opportunity to genuinely influence local decision-making by responding to this consultation.

Summary

CPRE urges the SDS positively shapes the future planning of investment and development across the Liverpool City Region, with championing of countryside and urban greenspace at its heart.

Yours sincerely

Jackie Copley MRTPI MA BA(Hons) PgCERT

Planning Manager



Appendix 1.0: What CPRE said in its response to Our Places consultation:

Below are CPRE's track change comments .

A Vision for the Spatial Development Strategy

We propose the following draft vision:

In 15 years we want to be a City Region where:

- A proactive, collaborative Spatial Development Strategy has been instrumental in delivering the goal of inclusive growth prioritising environmental responsibility;
- Effective action to tackle Climate Change has been, and is being, increasingly taken; with measures put in place to increase our resilience to its effects;
- Our health and wellbeing is fundamental in deciding how we shape the places we live, work and meet;
- Opportunities for Building Back Better have been taken, creating a genuinely inclusive economy that is more competitive, connected, resilient, sustainable and greener; providing quality jobs, prospects and prosperity;
- Our town centres, creatively re-purposed and reimagined, provide opportunities for businesses and communities to thrive and develop;
- Homes are provided to meet all our needs, are well designed and fit for the future, forming safer and well-connected communities;
- The value of new development looks beyond simple economic returns to deliver wider and lasting social and community benefits, including in our rural areas and urban greenspace.

We propose the following draft objective for the Spatial Development Strategy to achieve and deliver.

Strategic Objective 1 - Tackling Climate Change and creating a greener City Region

This will be achieved by:

- Driving down demand for more energy while driving up standards and securing opportunities to reduce greenhouse gas emissions, helping to meet and monitor the City Region's target of net zero carbon by 2040.
- Prohibiting peat loss and ensuring for conservation of important peat and low lying areas that act as a carbon store.
- Increasing resilience to the effects of Climate Change, ensuring its impacts do not lead to social and economic inequalities.
- Ensuring the most effective and strategic use of land, maximising the potential to utilise brownfield land, reducing the need to travel and securing environmental improvements from new development.
- Protecting and improving our valued rural and urban green spaces (including within urban areas) and natural environment for the long-term benefit of all.

- Facilitating a transition to integrated greener transport and promoting active travel and public transport.
- Managing and utilising resources in a sustainable and responsible way as part of a circular economy.
- Facilitating clean and renewable energy generation and greater energy efficiency in buildings.

Key reasons behind CPRE comments

The Metro Mayor and Combined Authority have reiterated climate emergency commitments, yet we still keep seeing development being approved in areas across the Liverpool City Region that impact land in the Green Belt, reducing the extent of our 'green lung' and causing more greenhouse gas emissions with knock on air quality and other adverse effects. For example, last week's Storm Christoph flooded Maghull. This is after new development was recently allowed on land in the Green Belt, despite local community opposition. More frequent and intense storms will occur due to the climate crisis, and it cannot just be business as usual. Strategic and local planning policies and allocations need to be revisited. We have repeatedly encouraged policies at the national, sub-regional and local level to be more effective at promoting sustainable development and prohibiting that which is not. 'Building Back Better', should be exactly this, taking opportunities to progress a greener recovery built on a sustainable and low carbon economy.

Strategic Objective 2: Addressing health inequalities and creating a healthier City Region

This will be achieved by:

- Improving the environmental conditions in which people and our future generations are born, live, work and age.
- Ensuring that development contributes to reducing inequalities in health and wellbeing.
- Shaping the environment to enable healthy and active lifestyles.
- Protecting and supporting the delivery of facilities that promote health, wellbeing and social cohesion.
- Tackling poor air quality by reducing the need for the dirtiest air and road based travel, raising standards and improving air quality by planting more trees, especially in densely populated areas, including city centres.

Key reasons behind CPRE comments

The Metro Mayor and Combined Authority have reiterated Liverpool City Region must address health and health inequalities as part of its legal framework, but when considering individual local authority areas air quality indicator performance it is possible to see that air quality has deteriorated in the past few years. Growth in sectors such as road based logistics is fuelling pollution from diesel HGVs on our roads and a modal shift to rail and water must be planned into the sub-region. There is a Planning Inquiry currently looking at an application for 1,000,000 sq ft of B8 sheds and a new Parkside Link Road on the former Parkside Colliery. CPRE encourages reuse of brownfield land, and

we support the local plan policy for a strategic multi-modal rail freight development. We are disappointed that the applications are road, and not rail focused set out in the adopted Local Plan Core Strategy Policy CAS 3.2 Development of a Strategic Rail Freight Interchange (SRFI) at the Former Parkside Colliery. The proposals are contrary to local plan policy, which stemmed from years of background planning work from the North West Regional Spatial Strategy in recognition of the site's rarity due to connection by two rail lines, east-west, and north-south and proximity to two M6 and M62 motorways. A multimodal solution for the Liverpool City Region is required if the Liverpool Port is to embed sustainable development principles. As it stands it the Liverpool Port is an unsustainable development, especially if Highway England's preferred option to build a road through the Rimrose Valley County Park, in Green Belt is allowed. It will remove the only local greenspace from a deprived part of the Sefton area, after years of public investment to provide an area for local recreation and wildlife, and in effect it would be a betrayal of public trust in the planning system to yield sound decisions, and completely against stated aims of the Liverpool City Region Combined Authority as expressed in the SDS Vision.

Strategic Objective 3: Delivering an Inclusive Economy

This will be achieved by:

- Transforming the City Region economy so that it promotes 'SMART growth' is responsibly competitive, environmentally clean, well connected, socially inclusive and future ready.
- Supporting the success of innovative, sustainable and socially responsible enterprises of all sizes and types.
- Redefining economic success so that it values and involves the prosperity of all people and places.
- Connecting businesses, visitors and communities through enhanced access to digital networks.
- Revitalising town centres so that they are renewed focal points for communities and businesses.

Key reasons behind CPRE comments

The Government's yearly records of English Indices of Deprivation show that almost a third of the City Region's neighbourhoods are within the top 10% most deprived in England, and the trend is downward. Consequently, the City Region should not promote low value economic sectors, such as road based logistics, that is greenfield land hungry and yields low job density, increasingly so with future automation. Liverpool 2 Port expansion must be embedded by investment in increased rail freight capacity to ensure imports and exports are transported in a more sustainable way than via the sub-regions motorway and strategic road networks, which are already frequently congested with associated adverse impacts of high greenhouse gas emissions and poor air quality. The economy should be more diverse in the future and lock in higher skilled and higher value jobs, that add real value to the economy of the Liverpool City Region and nationally.

Smart Growth is a sustainable approach to planning that emphasises compact and accessible urban communities and which opposes urban sprawl and car dependency. It seeks traditional ways of

planning towns based around local services, ease of walking and cycling and good public transport, especially rail-based. It looks for ways to rebuild our lost sense of community. For more information please visit: <http://www.smartgrowthuk.org/>.

Strategic Objective 4: Creating high quality buildings and places that allow our communities to flourish

This will be achieved by:

- Facilitating the provision of the right homes, prioritising brownfield land, to accommodate our needs, creating new and revitalised communities.
- Ensuring high design standards to deliver beautiful buildings and places that are future ready, safe, sustainable, energy efficient and enable healthier and happier lives.
- Positively shaping development so that it responds to and respects the City Region's unique characteristics, creating high quality and attractive places where people want to live, work, visit and meet.
- Protecting and utilising our built heritage and cultural assets for the benefit of current and future generations.
- Ensuring our natural environment experiences a net gain to biodiversity through sympathetic design, and retention and increased planting of trees and hedgerows that promote good habitats.

Key reasons behind CPRE comments

The heritage of the Liverpool City Region rural and urban built and natural environments should be protected and enhanced for the benefit of future generations.. CPRE supports good place making and the achievement of good quality design.

Strategic Objective 5: Maximising Social Value from all aspects of development

This will be achieved by:

- Requiring those who propose development to measure the social and environmental change they cause in accordance with refreshed local plan policy monitoring frameworks in order to maximise an increase in social value.
- Ensuring that social value generated by development benefits the users, occupiers and surrounding communities, particularly those that are most deprived and excluded.
- Creating a performance monitoring framework that enables the scope and consideration given to the social dimension of sustainable development to be fully realised.

Key reasons behind CPRE comments

The health and well-being benefits of greenspace should be considered in the context of social value as new development is planned across the Liverpool City Region.